

Botworx.ai Privacy Policy

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This Privacy Policy explains the practices of Truverse Inc. (“Botworx”, “we”, “us” or “our”) regarding the collection, use and disclosure of information that we receive when you use with respect to your access and use of our services, whether through our website located at <http://www.botworx.ai> or other websites we may own or control (the “Site”), bot services, bot applications, messaging services, messaging applications or SDK (the “Services” and with the Site, collectively, “Botworx Offerings”) This Privacy Policy applies only to the Botworx Offerings and doesn’t apply to any third-party websites, services or applications, even if they are accessible through the Botworx Offerings or the Services appear within them.

By using or accessing the Botworx Offerings, you give us your consent to collect and process your personal data in accordance with this privacy policy. If you do not wish to allow us to do so, please do not use the Botworx Offerings. If you wish us to stop collecting and processing your personal data, please contact us via e-mail at privacy@botworx.ai, let us know how you access Botworx Offerings and we will respond to you with specific instructions to follow.

BOTWORX SERVICES, BOTWORX CUSTOMERS, AND YOUR RIGHTS

Botworx Services allow the automation of individual users’ chat or messenger application or service interactions with Botworx’ customers, using third party services such as Facebook Messenger, WeChat, Android Messages, Twitter, Apple’s iMessage, and (“Surrounding Services”). The majority of the personal data that Botworx collects and processes belongs to Botworx’ customers, and they are the data controllers with respect to that personal data. However, Botworx does retain and process some personal data collected through the Services on its own behalf, and is the controller for that personal data.

Botworx Customers and Your Rights.

Botworx emphasizes that this privacy Policy does not address the practices or policies of its Services customers (“Botworx Customers”), nor of any Surrounding Services, website, mobile app, or other property that uses the Services. Botworx Customers use the Services to collect and process personal data for the legitimate interest of communicating with individuals regarding their businesses and of marketing to individuals.

Botworx Customers own the data that they provide to and collect through the Platform Services. The collection, retention, processing and other uses of data by Botworx Customers, whether or not in connection with the Platform Services, is governed by their own privacy policies and applicable laws, rules, or regulations. Botworx does not control those Botworx Customer activities.

Each Botworx Customer is the data controller with respect to all such data, and the applicable data protection officer (if any) will be someone appointed by the Botworx Customer.

Botworx’ Own Activities

Botworx collects and processes personal data for the legitimate interest of providing the Services to Botworx Customers. Botworx is the data controller with respect to that personal data, and this privacy policy describes Botworx’ activities with respect to that personal data.

Your Rights

Under the applicable laws of various countries, you may have certain rights concerning your personal data, such as under EU law, the right to access to, rectification or erasure of, and/or restriction of processing or objection to processing of your personal data. If you believe that a Botworx Customer has collected or processed your personal data, and you have any questions or want to exercise any of your rights with respect to your personal data, you should contact them directly. If you have trouble reaching the relevant Botworx Customer directly or if you wish to exercise your rights with respect to personal data collected or processed by Botworx on its own

behalf, please contact Botworx via e-mail at privacy@botworx.ai, let us know how you access Botworx Offerings and we will respond to you with specific instructions to follow

If you are a resident in the European Union, you also have the right to at no cost to lodge a complaint with EU data protection authorities. This right may also exist in other countries. If you have questions please ask the relevant Botworx Customer (if your questions apply to their activities), or Botworx (if your questions apply to our activities) or the data protection authority in your country.

WHAT INFORMATION DO WE COLLECT?

Information we collect on behalf of Botworx Customers

Service Users. We collect personal data that you, as an authorized user of our Service may provide to us when you use or access the Services, including when you or your employer create a Services account (“Account”). We may collect personal data that can be used to identify you, such as your name, email address, and phone number. This personal data is used to provide the Service to the relevant Botworx Customer. Please note that information regarding *Account-holding Service users* is handled differently from the information collected from the *end users who interact with our Service* as provided on behalf of Botworx Customers.

End Users. When provided to us, we collect the following personal data from end users of the Service (i.e., people who interact with our conversational services, chat services or chatbots) on behalf of Botworx Customers: (a) first and last name, gender, unique ID or Customer-specific ID for the Surrounding Service, the Botworx Customer or Customers with which the end user interacts, gender, registration locale (not current location), language used, the conversation that the end user has with our Service, (b) information regarding the end users’ interests or sentiments derived from the information in (a). and (c) IP address if and when the user interacts with content presented inside a web-view displayed within the Surrounding Service.

Information we collect on our own behalf

End User Interactions. When provided to us, we collect the following personal data from end users of the Service (i.e., people who interact with our conversational services, chat services or chatbots) on our own behalf: (a) first and last name, gender, unique ID or Botworx Customer-specific ID for the Surrounding Service, the Botworx Customer or Customers with which the end user interacts, gender, registration locale (not current location), language used, (b) information regarding the end users’ interests or sentiments derived from the information in (a) and the conversations that the end user has with chatbots using the Service and (c) IP address if and when the user interacts with content presented inside a web-view displayed within the Surrounding Service. Please note that Botworx does not retain any chatbot conversations for its own use.

Direct Inquiries. If you contact us by email or using a contact form through the Site, we may keep a record of your contact information and correspondence, and may use your email address, and any information that you provide to us in your message, to respond to you.

Analytic Data. We automatically collect the following information concerning the use of the Botworx Offerings (“Analytic Data”).

- *Site.* Our servers automatically record certain information about how a person uses and interacts with the Site (“Log Data”), including both Account holders and non-Account holders who interact with our Site (including as to Account holders, the administrative interface to our Services). Log Data may include information such as a Internet Protocol (IP) address and network status, application identifier, browser type, operating system, the pages or features of our Site or the administrative interface to our Services to which an individual browsed and the time spent on those pages or features, frequency with which the Services are used by an individual, search terms, the links on our Services that an individual has clicked on, Surrounding Services information (as described below) and other statistics.

- *Cookies and Tracking Pixels.* On our website or activities related to marketing our services, we enable the collection certain information through the use of “cookies,” which are small text files that are saved by your browser when you access our Services and tracking pixels, which are small graphic images embedded in web pages or e-mails or messages, to track views, actions and other performance statistics. These may include both session cookies (deleted when you log off from the Services and close your browser) and persistent cookies. Although most browsers automatically accept cookies, you can change your browser options to stop automatically accepting cookies (either all cookies, or only “third party cookies” from a web domain other than the one currently in your browser) or to prompt you before accepting cookies. Please note, however, that if you don’t accept cookies, you may not be able to access all portions or features of the Services. If you choose not to receive tracking pixels in your emails, you will need to disable HTML images in your email program, but that may affect images in other emails you receive.
- *Third Party Analytics.* We may also use analytics technologies from third parties such as Google Analytics. (For Google’s privacy practices see www.google.com/analytics/learn/privacy.html and to opt out of data recording and analysis by Google Analytics on our Sites, see <https://tools.google.com/dlpage/gaoptout>.)

HOW DO WE USE YOUR INFORMATION?

We use the information collected through our Services to provide, improve, and promote our Services.

Uses include the following.

- To monitor, research, analyze and report on the usage of the Services, including with respect to user experiences and sentiment;
- To personalize and enhance the Services by (among other things) expanding and customizing content, advertisements, features and functionality to users’ needs and interests;
- To administer and operate the Services and our business, including providing any Services you have requested, and to process transactions relating to the use of the Services;
- To provide the Services on behalf of our customers;
- To respond to your communications, provide customer service, and otherwise to contact you with administrative communications, newsletters, marketing or promotional materials and other information that may be of interest to you. If you decide at any time that you no longer wish to receive certain communications from us, please follow the opt-out procedure described below; and
- To enforce or exercise any rights in our terms and conditions and enforce compliance with laws and law enforcement.

WHAT INFORMATION DO WE SHARE WITH THIRD PARTIES?

We will not share any personal data that we have collected from you except as described below:

Information collected on behalf of our customers

As part of the Service delivered to the Botworx Customers, we collect certain personal data described above, including, without limitation, personal data regarding the identity of each Botworx Customer’s end users (such as name, address, phone number, email and IP address) as well as other personal data identifiable to such users (such as online activity, purchases made, or services used). We may also collect and process Surrounding Services information as part of the Services, as described below.

All information is made available to and shared with the Botworx Customer for which we are providing the Services. Such information may also be shared with third parties, if and as we are directed to do so from time to time by the relevant Botworx Customer. We may also share Analytic Data and non-identifiable information with Botworx Customers more generally, or with third parties if and as directed by the relevant Botworx Customer.

Information provided to Surrounding Services

Our Services operate within third-party messenger and social networking services such as Facebook, WeChat, Twitter, Android Messages or Apple's iMessage ("Surrounding Services"), and we typically interact with Botworx Customers' users as identified by the account identifiers they use for the relevant Surrounding Service. This means that we automatically access certain personal data, such as user name and gender and other personal data that user privacy settings on the Surrounding Service account permit us to access. We don't receive or store passwords for any Surrounding Services accounts.

Further, you should be aware that any information shared during an interaction with our Services is visible to, and may be collected by, the relevant Surrounding Service(s). This privacy policy does not apply to any information collected by the Surrounding Services, so we recommend that users refer to the Surrounding Services' privacy policies with respect to any information collected by or visible to the Surrounding Service. We are not responsible for the privacy policies or actions of the Surrounding Services.

Information shared in connection with advertising

We may share certain personal data with our advertising partners and contractors as described below under "What information do we collect, use and disclose for advertising?"

Information shared with our service providers

We may engage third party service providers to work with us to administer and provide the Services. These third-party services providers have access to your personal data only for the purpose of performing services on our behalf and are expressly obligated not to disclose or use your personal data for any other purpose.

Information shared with other third parties

We may share aggregated information and non-identifiable information with third parties for industry analysis, demographic profiling and other similar purposes.

Information disclosed in connection with our business transactions

Information that we collect from our users, including personal data, is considered to be a business asset. As a result, if we go out of business or enter bankruptcy or if we are acquired as a result of a transaction such as a merger, acquisition or asset sale, your personal data may be disclosed or transferred to the third-party acquirer in connection with the transaction.

Information disclosed for our protection and the protection of others

It is our policy to protect you from having your privacy violated through abuse of the legal systems, whether by individuals, entities or government, and to contest claims that we believe to be invalid under applicable law. However, it is also our policy to cooperate with government and law enforcement officials and private parties. Accordingly, we reserve the right to disclose any information about you to government or law enforcement officials or private parties as we believe necessary: (i) to satisfy or comply with any applicable law, regulation or legal process or to respond to lawful requests, including subpoenas, warrants or court orders; (ii) to enforce our agreements with you or third parties, to protect our property, rights and safety and the rights, property and safety of third parties or the public in general; and (iii) to prevent or stop activity we consider to be illegal or unethical.

Information we disclose with your consent or at your request

We will share your personal data with third-party sites or platforms, such as social networking sites, if you have expressly requested that we do so.

WHAT INFORMATION DO WE COLLECT, USE AND DISCLOSE FOR ADVERTISING?

We may use and disclose collected personal data as described above for purposes of providing services such as advertising, either directly or through our partners and contractors.

We may employ third party ad serving technologies that use certain methods to collect information as a result of ad serving through Services.

Botworx or third parties operating the Botworx Offerings may use the personal data, including unique IDs for Surrounding Services, demographic and geolocation information (as described above), information concerning your interests and sentiments derived from your interactions with the Service as well as information logged from your device to ensure that relevant and personalized content is presented within the Service.

The foregoing personal data may be used and disclosed in accordance with this Privacy Policy and the privacy policy of the company providing the ad serving technology.

Though the use of services enabled by Botworx, you may see behaviorally targeted advertising. If you wish to do not wish to have your personal data used to provide you with targeted advertising, you have several choices:

- Reset your mobile device's advertising identifier or set it to opt out of targeted advertising.
 - Android: You can reset your advertising ID at any time, right from the Ads section of the Google Settings app on your device. From the same app, you can also opt-out of targeted advertising based on the advertising ID by setting the appropriate ad tracking preference.
 - iOS: You may opt-out by electing Limit Ad Tracking in your device's settings menu (as of the date of this Privacy Policy, located at Settings > Privacy > Advertising).

Also, you should be aware that if you stop the use of your personal data to show you targeted advertising it does not mean that you will no longer receive advertising. It just means that the advertising you see displayed will not be customized to you and your interests and may be less relevant to you.

Finally, please note that Botworx Customers may serve you advertising within our Services or request that we serve you advertising within our Services. Similarly, you may see advertising delivered by Surrounding Services, or by third party applications or websites in which the Services appear, or to which content in the Services may link As indicated above, we do not control the use of personal data or other information that anyone except us may collect when you use our Services to interact with them. Botworx Customers, Surrounding Services, and other third parties may use personal data you share with them or collect elsewhere for advertising purposes, and the procedures above may not be effective with respect to advertising served within our Service by or on behalf of Botworx Customers, Surrounding Services, or those other third parties.

DO NOT TRACK

Our Site honors the Do Not Track setting in your browser, and where the Surrounding Service permits our Services to honor the Do Not Track setting in your browser, we will do so. Where the Surrounding Service does not permit our Services to honor the Do Not Track setting in your browser, we will not do so. However, third party service providers we have engaged may use cookies to collect your personal information or online activities over time and across different web sites, and we are not always informed about their policy toward Do Not Track mechanisms. For more information regarding Do Not Track mechanisms, see <http://allaboutdnt.com/>.

THE SECURITY OF YOUR INFORMATION

We take reasonable measures to protect the information that we collect from or about you (including your personal data) from unauthorized access, corruption, use or disclosure. Please be aware, however, that no method of transmitting information over the Internet or storing information is completely secure. Accordingly, we cannot guarantee the absolute security of any information.

OTHER PARTIES

The Botworx Offerings may contain links to other websites and services, or allow you to communicate with third parties directly. Any information that you provide on or to a third party website or service or otherwise to a third party is provided directly to the relevant third party and is subject to that party's privacy policy. Our privacy policy does not apply to such websites or services and we are not responsible for the content, privacy or security practices and policies of those websites or services. To protect your information, we recommend that you carefully review the privacy policies of other websites and services that you access, and make careful choices with respect to third parties with whom you communicate.

MODIFYING YOUR INFORMATION

Changing or updating account-holder information

Account holders can access or change their Services Account information or delete their Account through their Service account settings page or by contacting us at remove@botworx.ai. We'll take reasonable steps to provide, modify or delete your information as soon as is practicable, but some information may remain in archived/backup copies for our records or as otherwise required by law or (if you are using the Services on behalf of one of our customers, as required by our agreement with that customer). [We may limit or reject your request, or charge a reasonable administrative fee in certain cases, as permitted or required by law.]

Changing, correcting or deleting personal data

If you seek to exercise your right to access, correct, amend, or delete personal data collected or processed by us on behalf of a Botworx Customer, you should direct your query to that Botworx Customer. If the relevant Botworx Customer requests that we remove or modify the relevant information, we will respond to their request as soon as is practicable. If the relevant Botworx Customer does not respond to you, please contact us at privacy@botworx.ai.

If you seek to exercise your right to access, correct, amend, or delete personal data collected or processed by us on our own behalf, contact us at privacy@botworx.ai.

When you contact us, we will need to know your first and last name, where you live, and on what Surrounding Service you interact with the Botworx Service, and whether you want to exercise your rights with respect to personal data associated with specific Botworx Customers, or with all of them.

OPTING OUT FOR ACCOUNT HOLDERS

If Account holders do not wish to receive promotional emails, newsletter notifications, or other communications from us, please follow the unsubscribe instructions provided in any of the communications from us or the messaging settings in the Surrounding Services you use. Please note that you will not be able to opt-out from receiving administrative communications regarding the Services unless you cease using the Services entirely and/or delete your account.

INTERNATIONAL TRANSFER

Your personal data may be transferred to, and maintained on, computers located outside of your state, province, country or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you are located outside the United States and choose to provide your personal data to us, we may transfer your personal data to the United States and process it there. Your consent to this Privacy Policy followed by your submission of any personal data represents your agreement to that transfer.

PRIVACY SHIELD

Botworx is actively working on attaining EU-U.S. and Swiss-U.S. Privacy Shield certification with respect to the personal data we receive and process through our services and we will update this document once we've received that certification. Botworx certifies that it adheres to the Privacy Shield principles of notice, choice, onward transfer, security, data integrity, access, and enforcement for the personal data of individuals in participating European countries.

OUR POLICY TOWARD CHILDREN

Our Services are not directed to children under 13 (16 in the EU) and we do not knowingly collect PII from children under 13 (16 in the EU). If we learn that we have collected PII of a child under 13 (16 in the EU) we will take steps to delete such information from our files as soon as possible.

CHANGES TO PRIVACY POLICY

Any information that we collect is subject to the privacy policy in effect at the time such information is collected. We may, however, modify and revise this Privacy Policy from time to time. If we make any material changes to this Privacy Policy, we'll notify you of such changes by posting them on the Botworx Offerings or by sending you an email or other notification, and we'll indicate when such changes will become effective. Your continued use of the Botworx Offerings after notice of such changes indicates your consent to be bound by them. Information will continue to be governed by the Privacy Policy in effect at the time such information was collected.

Questions?

Please contact us at privacy@botworx.ai if you have any questions about this Privacy Policy.