

Privacy Policy

Effective as of August 15th, 2025

Coupr Inc. and its subsidiaries and affiliates ("**Coupr**," "**we**", "**us**" or "**our**") provides an AI assistant designed to bridge the gap between physical retail and online services. This Privacy Policy describes how Coupr processes personal information that we collect through our digital or online properties or services that link to this Privacy Policy (including as applicable, our website, and social media pages) as well as our in-store shopping application and devices, marketing activities and other activities described in this Privacy Policy (collectively, the "**Service**").

This Privacy Policy does not apply to information that we process on behalf of our business customers (such as stores or retail environments that use our platform) while providing the Coupr platform to them. Our use of information that we process on behalf of our business customers may be governed by our agreements with such customers. If you have concerns regarding your personal information that we process on behalf of a business customer, please refer to that enterprise customer's privacy policy or direct your concerns to that enterprise customer.

Personal information we collect

Information you provide to us. Personal information you may provide to us through the Service or otherwise includes:

- **Contact data**, such as your first and last name, email address, and phone number.
- **Demographic data**, such as your city, state, country of residence, gender, and age.
- **Profile data**, such as the username and password that you may set to establish an online account on the Service, interests, preferences, information about your participation in our promotions or surveys, retailer rewards program participation information, and any other information that you add to your account profile.
- **Communications data** based on our exchanges with you, including when you contact us through the Service, social media, or otherwise.
- **Promotion data**, including information you share when you enter a promotion or complete a survey. Please note that if you participate in a sweepstakes, contest or giveaway through the Service, we may ask you for your Contact Data to notify you if you win or not, to verify your identity, determine your eligibility, or to send you prizes. In some situations, we may need additional information as a part of the entry process, such as a prize selection choice. These sweepstakes and contests are voluntary. We recommend that you read the rules and other relevant information for each sweepstakes and contest that you enter.
- **Other data** not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

Third-party data. Personal information about you that we receive from third parties may also include:

- **Transactional data**, such as information relating your in-store transactions with retailers with whom we partner, including basket value, prices, discounts, and transaction history.

Automatic data collection. We, our service providers, and our business partners may automatically log information about you and your interaction over time with the Service, including your interaction with in-store devices and related software, our communications and other services, such as:

- **Precise geolocation data**, such as data we collect using Bluetooth beacons, Wi-Fi, inertial sensors, and other sensors to understand in-store navigation, shopping activity and behavior.

For more information concerning our automatic collection of data, please see the [Tracking technologies](#) section below.

Data about others. We may offer features that help users invite their friends or contacts to use the Service, and we may collect contact details about these invitees so we can deliver their invitations. Please do not refer someone to us or share their contact details with us unless you have their permission to do so.

Tracking & Other Technologies

Automatic data collection technologies. Some of the automatic collection described above is facilitated by the following technologies:

- **Software Development Kits**, or SDKs, that enable us gather analytics on users of our in-store app. SDKs operate only while you are interacting with the in-store application. The analytics collected by SDKs include which links you click, searches, taps, items viewed, and forms you complete.

For information concerning your choices with respect to the use of tracking technologies, see the [Your choices](#) section, below.

How we use your personal information

We may use your personal information for the following purposes or as otherwise described at the time of collection:

Service delivery and operations. We may use your personal information to:

- provide the Service and operate our business;
- enable security features of the Service;
- establish and maintain your user profile on the Service;
- facilitate your invitations to friends who you want to invite to join the Service;
- communicate with you about the Service, including by sending Service-related announcements, updates, security alerts, and support and administrative messages;

- communicate with you about events or contests in which you participate; and
- provide support for the Service, and respond to your requests, questions and feedback.

Service personalization, which may include using your personal information to:

- understand your needs and interests;
- personalize your experience with the Service and our Service-related communications; and
- remember your selections and preferences as you navigate our platform.

Service improvement and analytics. We may use your personal information to analyze your usage of the Service, improve the Service, improve the rest of our business, help us understand user activity on the Service, including which pages are most and least visited and how visitors move around the Service, as well as user interactions with our emails, and to develop new products and services.

Interest-based advertising. We, our service providers, and third-party advertising partners may use certain technologies to collect information about your interaction (including the data described in the automatic data collection section above) with the Service, our communications and other online services over time, and use that information to serve online ads that we or they think will interest you, including on our in-store devices. This is called interest-based advertising. We may also share information about our users with these companies to facilitate interest-based advertising to those or similar users on other online platforms. You can learn more about your choices for limiting interest-based advertising in the [Your choices](#) section below.

Promotions. We may use your personal information to administer promotions.

Compliance and protection. We may use your personal information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas, investigations or requests from government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements or our internal policies;
- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

Data sharing in the context of corporate events, we may share certain personal information in the context of actual or prospective corporate events – for more information, see [How we share your personal information](#), below.

To create aggregated, de-identified or anonymized data. We may create aggregated, de-identified or anonymized data from your personal information and other individuals whose personal information we collect. We make personal

information into de-identified or anonymized data by removing information that makes the data identifiable to you. We may use this aggregated, de-identified or anonymized data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business, and to train our AI models and for other machine learning purposes.

How we share your personal information

We may share your personal information with the following parties (or as otherwise described in this Privacy Policy, in other applicable notices, or at the time of collection).

Affiliates. Our corporate parent, subsidiaries, and affiliates.

Service providers. Third parties that provide services on our behalf or help us operate the Service or our business (such as hosting, information technology, customer support, email delivery, marketing, consumer research and website analytics).

Advertising partners. Third-party advertising companies for the [interest-based advertising purposes](#) described above.

Third parties designated by you. We may share your personal information with third parties where you have instructed us or provided your consent to do so.

Business and marketing partners. Third parties with whom we partner, including parties with whom we co-sponsor promotions, with whom we jointly offer products or services, or whose products or services may be of interest to you.

Professional advisors. Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

Authorities and others. Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the [Compliance and protection purposes](#) described above.

Business transferees. We may disclose personal information in the context of actual or prospective business transactions (e.g., investments in us, financing of us, public stock offerings, or the sale, transfer or merger of all or part of our business, assets or shares). For example, we may need to share certain personal information with prospective counterparties and their advisers. We may also disclose your personal information to an acquirer, successor, or assignee of us as part of any merger, acquisition, sale of assets, or similar transaction, or in the event of an insolvency, bankruptcy, or receivership in which personal information is transferred to one or more third parties as one of our business assets.

Your choices

In this section, we describe the rights and choices available to all users.

Access or update your information. If you have registered for an account with us through the Service, you may review and update certain account information by logging into the account.

Declining to provide information. We need to collect personal information to provide

certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

Close your account. If you wish to request to close your account, please [contact us](#).

Other sites and services

The Service may contain links to websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions. We encourage you to read the privacy policies of the other websites, mobile applications and online services you use.

Security

We employ technical, organizational and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies, and we cannot guarantee the security of your personal information.

International data transfer

We are headquartered in the United States and may use service providers that operate in other countries. Your personal information may be transferred to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country.

Children

The Service is not intended for use by anyone under 18 years of age. If you are a parent or guardian of a child from whom you believe we have collected personal information in a manner prohibited by law, please [contact us](#). If we learn that we have collected personal information through the Service from a child without the consent of the child's parent or guardian as required by law, we will comply with applicable legal requirements to delete the information.

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service or other appropriate means. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Service after the effective date of any modified Privacy Policy indicates your acknowledging that the modified Privacy Policy applies to your interactions with the Service and our business.

Additional information for California residents

Shine the light law. To the extent it applies to us and the Services, under California's Shine the Light law (California Civil Code Section 1798.83), California residents may ask companies with whom they have formed a business relationship primarily for personal, family or household purposes to provide the names of third parties to which the company has disclosed certain personal information (as defined under the Shine the Light law) during the preceding calendar year for the third party's own direct marketing purposes, and the categories of personal information disclosed. Alternatively, you have the right to opt-out of our disclosure of your personal information to third parties for their direct marketing purposes. You may send us requests under this law to **privacy@coupr.io**. In your request, you must include the statement "Shine the Light Request," and provide your first and last name and mailing address and certify that you are a California resident. We reserve the right to require additional information to confirm your identity and California residency. Please note that we will not accept requests via telephone, mail, or facsimile, and we are not responsible for notices that are not labeled or sent properly, or that do not have complete information.

How to contact us

- **Email:** privacy@coupr.io