Solutions by Text, LLC d/b/a SBT Privacy Policy
Updated November 4, 2026

SBT is a trade name (DBA) of Solutions by Text, LLC. This amended Privacy Policy replaces the Solutions by Text, LLC d/b/a SBT ("SBT") Privacy Policy in effect before November 4, 2026. By beginning or continuing to use SBT's products and services, Customer consents to be bound by this Privacy Policy unless otherwise expressly agreed to in writing by the parties.

This Privacy Policy ("**Privacy Policy**") describes how SBT, our Service Providers, and our affiliates ("**SBT**", "**we**", "**us**", or "**our**") may collect, use, store, disclose, process, and transfer your personal information through your access to or use of SBT products and services, including those at https://sbt.io/ and the FinText® Platform as well as any subdomains, website of ours that links to this Privacy Policy, related websites, and other offerings (collectively, the "**Services**"). By using the Services or, if required by laws applicable to you, opting into this Privacy Policy, you signify your acceptance of this Privacy Policy. If you do not agree to this Privacy Policy, please do not use the Services. SBT may change this Privacy Policy from time to time by posting changes at https://sbt.io/privacy-policy/ and may send notification emails regarding such changes. Your continued use of the Services following the posting of such changes will be deemed your acceptance of those changes, unless applicable law requires additional consent.

Processing Info on behalf of Customers: To the extent SBT processes Personal Information on behalf of SBT's Customers that want to engage with individual consumers ("Customer's Subscribers") through the Service, SBT acts a data processor or service provider on behalf of these Customers. Our processing of Customer's Subscribers' Personal Information is governed by this Privacy Policy and governed by SBT's agreements with those Customers. Customer Subscribers who wish to exercise any privacy rights in connection with their Personal Information that has been submitted to SBT by a Customer should inquire with that Customer directly. Because we only process Customer Subscribers' data upon instruction from that Customer, Customer Subscribers who make a request directly to SBT should provide to us the name of the Customer who submitted their Personal Information to us. If we can verify the Customer, we will refer the request to that Customer and support them as needed in responding to the request within a reasonable timeframe.

Summary

SBT encourages you to read this Privacy Policy in its entirety, but here are a few key points:

1. **Privacy Policy Applicability**:

This Privacy Policy applies when you access the Services or share information with SBT. SBT may revise this Privacy Policy at any time. More

2. Information We Collect from You

We collect all information that you provide directly to us; information you provide via the Services, your devices (*e.g.*, computers, smartphones, and tablets), telephone and email; and information we receive from partners and through the use of cookies and similar technologies. More

3. How We Use Your Information

We process your personal information only with your consent or as needed to provide you the Services. We may also use your personal information to comply with legal obligations, operate our business, protect the vital interests of you, our customers, or the public, or for other legitimate interests of SBT. More

4. How We Share Your Information

We may share your information with our partners, service providers, contractors, agents, and third-party vendors as they need it to help us provide the Services, for other requests you make of SBT, or in furtherance of our other reasons discussed in this Privacy Policy. We may also share your information to comply with law or for other legitimate interests. More

5. How We Store and Secure Your Information

We will retain your information as long as necessary for the purposes outlined in this Privacy Policy or for so long as permitted by law, whichever is shorter. SBT takes technological and organizational measures designed to protect your personal information against loss, theft, and unauthorized access, use, disclosure, or modification. More

6. Accessing and Updating Your Information

You can access, get copies of, request deletion of, change, or correct your personal information, or request changes to our use of your personal information by using the contact information below. More

7. Additional Privacy Information

SBT's databases are located in the United States, and you consent to the transfer of your personal information from your location to the United States. The Services are not for use by children under the age of 18 or the lowest age permitted by applicable law. To our knowledge, we do not collect or process the personal information of any children under the age of 18 or the lowest age permitted by applicable law. If you are under the age of 18, you may not use the Services or provide your information to us. If you have any questions about this Privacy Policy, please contact us via the contact information below. More

8. Rights under State Law

If you are a California, Colorado, Connecticut, Delaware, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, or Virginia resident, you may have additional rights under the applicable privacy laws and regulations. More

9. Data Processing

SBT will process data in accordance with its Data Processing Agreement ("DPA"). More

Privacy Policy Applicability

This Privacy Policy applies when you use or access the Services or share information with SBT. By accessing or using the Services and/or opting into this Privacy Policy (as applicable in your jurisdiction), you consent to this Privacy Policy.

Please note that this Privacy Policy applies only to the Services and not to any other third-party website linked to or from it, or any third-party website in which SBT's content or functionality is embedded, including any product or service of a SBT Customer. We do not control the privacy policies or practices of others.

Information We Collect from You

Information We Collect from Customers, Customers' Representatives and Website Visitors.

In general, we receive and collect all information you provide via the Services, including through website input fields, phone, email, forums, or other such ways. The following does not include any personal information provided to SBT by a SBT Customer. This includes personal information collected by us that can identify or relate to you, including, but not limited to:

Category of Personal Information	Examples of Personal Information We Collect	Categories of Sources from which such Personal Information is Collected	Categories of Third Parties or Services Providers with whom we share such Personal Information
Profile or Contact Data	Examples may include: • Full name • Telephone number • Email address	• You	• SBT Customers • Service providers • Partners you authorize, access, or authenticate

	• Information or other similar identifiers		
Device/IP Data	Examples may include: • IP address • Device ID • Domain server • Browser type • Type of device • Information regarding your interaction with the Services or any advertisement • Information collected automatically through cookies and similar technology, device type, domain names, and access time/logs	• You • Service providers	• Data analytics providers • Service providers
Geolocation Data	Examples may include: • General physical location • Precise physical location • Movements • IP-address-based location information • Cookie ID	• You • Service providers	• Data analytics providers • Service providers
Web Analytics	Examples may include: • Web page interactions • Referring webpage/source through which you accessed the Services • Browsing activity, including the addresses of websites that you visit	• You • Service providers	• Data analytics providers • Service providers

	• Non-identifiable request IDs • Statistics associated with the interaction between device or browser and the Services		
Inferences Drawn from Other Personal Data Collected	Examples may include: • Profiles reflecting user behavior	• Service providers	• Data analytics providers
Other Identifying Information that You Voluntarily Decide to Provide	Examples may include: • Identifying information in emails, texts, letters, or other communications you send us	• You	• Service providers • Third-party vendors

You have the choice regarding what information to share and the Services you want to engage. You can choose not to provide information to us, but in general, some information about you is required in order for you to access certain functionalities of the Services.

We also may periodically obtain information about you from affiliated entities, partners and other independent third-party sources and will add it to our database of information, including any information that you provide to third parties that are associated or whose products or services are integrated with the Services, such as a SBT Customer.

Information We Automatically Collect.

We may use cookies, device identifiers, advertising identifiers, and similar tracking technologies, including those from third-party service providers like Google Analytics, HubSpot, and other cloud-based tools, to automatically collect your preferences, performance data, and information about your web usage when you visit the Services. For example, we may collect your IP address, device and Internet service provider information, Web browser details and the address of any referring website. We may also collect information about your online activity, such as pages viewed and interactions with these pages. This may include collecting geolocation signals from your IP address or device settings to determine your location. By collecting and using this information, we may operate and personalize the Services for you. For more information on how we use cookies, please see the “Cookies” section below.

The Services are designed to recognize or respond to “do not track” signals received from browsers. You can control the information collected by such tracking technologies or be alerted when cookies are sent by

adjusting the settings on your Internet browser or devices, but such adjustments may affect or disable certain functionality of the Services.

Cookies

Cookies, also known as tracking cookies or browser cookies, and similar technologies such as web beacons, clear GIFs, pixel tags, and JavaScript (collectively, "**Cookies**") are small pieces of data, usually text files, placed on a computer, tablet, phone, or similar device when you use that device to access the Services. We use the following types of Cookies:

- **Essential Cookies.** Essential Cookies are necessary for providing you with the Services and features that you requested. For example, these Cookies allow you to log into and stay logged into secure areas of the Services, save language preferences, and more. These Cookies are required to make the Services available to you, so they cannot be disabled.

- **Functional Cookies.** Functional Cookies are utilized to record your choices and settings, maintain your preferences over time, and recognize you when you return to our Services. These Cookies help us personalize our content for you, greet you by name, remember your preferences, and more.

- **Performance/Analytical Cookies.** Performance/Analytical Cookies allow us to understand how visitors (like you) use the Services. These Cookies accomplish this by collecting information about the number of visitors to the Services, what pages visitors view the most, and how long visitors view specific pages. These Cookies also help us measure and manage the performance of our advertising campaigns to help us improve the campaigns and the Services' content. For example, Google LLC ("Google") uses cookies in connection with its Google Analytics services. Google's ability to use and share information collected by Google Analytics about your visits to the Services is subject to the Google Analytics Terms of Use and the Google Privacy Policy. You have the option to opt-out of Google's use of Cookies by visiting the Google advertising opt-out page at http://www.google.com/privacy_ads.html or the Google Analytics Opt-out Browser Add-on at https://tools.google.com/dlpage/gaoptout/.

You have the option to decide through your internet browser's settings whether to accept Cookies. You can also clear all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit the Services, and some functionalities may not work. To explore what Cookie settings are available to you, look in the "settings", "preferences" or "options" section of your browser's menu.

Information About Customer Subscribers that Customers Provide to SBT.

Customers may provide SBT with information about their Subscribers through the Service. Customers are responsible for providing appropriate notice and obtaining appropriate consents for SBT to process this information.

How We Use Your Information

We process your personal information with your consent or as needed to provide the Services. We may also use your personal information to comply with legal obligations, operate our business, protect the vital interests of you, our customers, or the public, or for other legitimate interests of SBT as described in this Privacy Policy.

More specifically, we may use your personal information to:

- **To send messages.** SBT may send messages to end users who expressly subscribe to account and / or marketing communications from SBT. If you would like to unsubscribe at any time from receiving future messages, please contact support@sbt.io.com. Subscribers messaging originator opt-in data and consent details will not be shared with any third parties not required for our everyday business purposes except when explicitly authorized by the subscriber.

- **Optimize and improve the Services.** We continually try to improve the Services based on the information and feedback we receive from you and our other users, including by optimizing the content on or functionalities of the Services.

- **Improve customer service.** Your information helps us to more effectively develop the Services and respond to your support needs.

- **Process transactions.** We may use the information you provide to fulfill your requests. We do not share this information with outside parties except to the extent necessary to provide the Services and related activities.

- **To send periodic communications.** The communication methods you provide through our contact forms on our website will be used to send information and updates pertaining to the Services. It may also be used to respond to your inquiries or other requests, including any support service requests. If you opt into our mailing list, you may receive emails that include SBT news, updates, product offerings and service information, and marketing material. If at any time you would like to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email or you may contact us via the contact information below. Please note that if

you unsubscribe from promotional emails, you may still receive communications related to your use of the Services or other necessary functionalities of the Services.

- **Carry out other legitimate business interests.** We may use the information you provide to carry out other legitimate business purposes, as well as other lawful purposes.

We may use any aggregated information (as described below) for any purpose.

How We Disclose Your Information

We may disclose your information with our partners, service providers, contractors, agents, and third-party vendors as needed to fulfill Services. you. Please note that our partners may contact you as necessary to obtain additional information about you, facilitate any use of the Services, or respond to a request you submit. We may disclose Customer Subscribers' Personal Information to the Customer with which that Customer Subscriber engages.

Third-party vendors who provide products, services or functions on our behalf may include mobile aggregators, business analytics companies, communications service vendors, and security vendors. We may also authorize third-party vendors to collect information on our behalf, including as necessary to operate features of the Services. Third-party vendors have access to and may collect personal information only as needed to perform their functions, may only use personal information consistent with this Privacy Policy and other appropriate confidentiality and security measures, and are not permitted to share or use the information for any other purpose.

We also may share your information:

- In response to subpoenas, court orders, or other legal process; to establish or exercise our legal rights; to defend against legal claims; or as otherwise required by law. In such cases we reserve the right to raise or waive any legal objection or right available to us.

- When we believe it is appropriate to investigate, prevent, or take action regarding illegal or suspected illegal activities; to protect and defend the rights, interests, or safety of our company or the Services, our customers, or others; or in connection with our Subscription Agreement and other agreements with customers of which you may be affiliated.

- In connection with a corporate transaction, such as a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

Other than as set out above, we will attempt to notify you when your personal information will be shared with third parties.

Personal Information You Post in Public Areas. When you post a message in a SBT review or customer feedback, the information you post may be accessible to other users of the Services and the public. If you post personal information anywhere on the Services that is accessible to other users or the public, you are advised that such personal information can be read, collected, used, or disseminated by others and could be used to send you unsolicited information or for other purposes. Accordingly, you assume full risk and responsibility for posting such information and agree that SBT is not responsible in any way for personal information you choose to post in these public areas.

Aggregated Information. We may use, publish, share, distribute, or disclose personal information that has been aggregated with information from other users and otherwise anonymized and de-identified in a manner that does not allow third parties, including SBT partners, sponsors, and advisers, to de-identify the data or identify it as originating from you. Such information may help SBT identify and analyze training, demographic, and psychographic trends and information and report to third parties how many people saw, visited, or clicked on certain content, areas of the Services, or other materials. We may also use such data for research purposes and optimizing the Services' functionality.

How We Store and Secure Your Information

Personal information collected by SBT may be stored and processed in your region, in the United States, and in any other country where SBT or its affiliates, subsidiaries, or service providers operate facilities. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective). However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Policy.

SBT does not have control over how or where any SBT Customer stores or processes your personal information.

SBT takes technological and organizational measures designed to protect your personal information against loss, theft, and unauthorized access, use, disclosure, or modification. For example:

- all personal information is stored by trusted third party providers (*e.g.*, Amazon Web Services (AWS));
- all systems used to provide the Services are password protected;
- all Services usage is restricted on a per-user basis on the principle of least privilege; and
- all data is encrypted during transfer and while at rest.

We rely on AWS' security programs to protect personal information while stored in their respective controlled facilities. For more information on AWS' security practices and processes, please see https://aws.amazon.com/security/.

SBT complies with applicable data protection laws, including applicable security breach notification requirements.

Data Retention

SBT will retain your personal information consistent with the original purpose of collection or as long as necessary to provide our Services, comply with our legal obligations; maintain accurate accounting, financial and other operational records; resolve disputes; and enforce our agreements.

We determine the appropriate retention period for personal information on the basis of the amount, nature, and sensitivity of the personal information being processed; the purpose for which the personal information was collected; the potential risk of harm from unauthorized use or disclosure of the personal information; whether we can achieve the purposes of the processing through other means; and applicable legal requirements.

After expiration of the applicable retention periods, your personal information will be deleted.

Accessing and Updating Your Information

To the extent provided by the law of your jurisdiction, you may:

i. Have the right to access certain personal information we maintain about you and request details about how we process it;
ii. Request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes;
iii. Request that we update or correct inaccuracies regarding your personal information;
iv. Object to our use of your personal information;
v. Ask us to block or delete your personal information from our database;
vi. Request to download the information you have shared on the Services; and
vii. Confirm whether SBT stores your data in the United States.

You may make these requests and any other inquiries about this Privacy Policy by emailing support@sbt.io or calling us at 1-800-979-1212. Any such requests are subject to the protection of other individuals' rights and applicable law. Additionally, to help protect your privacy and

maintain security, we may take steps to verify your identity before granting you access to the requested information.

If you make these requests with respect to any personal information SBT received from a SBT Customer, we may direct you to the applicable SBT Customer or send your request to the SBT Customer and the SBT Customer will contact you directly. Depending on the applicable law and the applicable agreement in place between SBT and the SBT Customer, SBT may not be able to directly respond to your requests without the SBT Customer's authorization.

Additional Privacy Information

Data Transfer. Our databases are currently located in the United States. SBT makes no claim that its Services are appropriate or lawful for use or access outside the United States. If you access the Services from outside the United States, you are consenting to the transfer of your personal information from your location to the United States. You are solely responsible for complying with all local laws, rules and regulations regarding online conduct and access to the Services. By providing us your information, you further consent to its storage within the United States.

Collection of Data from Children. The Services are not directed to children, and you may not use the Services or provide any personal information to SBT if you are under the age of 18 (or the lowest age permitted by applicable law) or if you are not old enough to consent to the processing of your personal information in your country. To our knowledge, we do not collect or process personal information of individuals under the age of 18 or the lowest age permitted by applicable law unless we receive all necessary consents from the individual's parent or guardian. If you are under the age of 18, you may not use the Services or provide your information to us.

California Resident Privacy Rights. California Civil Code Section 1798.83 permits our customers who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please e-mail us or contact us through the methods stated above. For more information regarding your rights under California law, please see the "California Resident Rights" section below.

Your Rights under State Law

California Resident Rights

If you are a California resident, you have certain rights under the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 ("**CCPA**"), to request us to explain how we collect, use, and share your personal information, and the rights and choices we offer California residents regarding our handling of your personal information. The CCPA currently defines "personal information" as "information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household."

Personal Information Collection, Use, and Disclosure

- We describe the sources through which we collect personal information and the types of personal information collected in the "Information We Collect from You" section in this Privacy Policy and in the table below.

- We describe the third-party sources from which we may collect certain of your personal information and the types of personal information collected in the "Information We Collect from You" section of this Privacy Policy.

- We describe the purposes for which we use and share this information in the "How We Use Your Information" section of this Privacy Policy.

- Information about how long we retain your personal information can be found in the "Data Retention" section of this Privacy Policy.

Does SBT Collect This Information?	Category of Personal Information	Examples
YES	A. Identifiers, such as name and location	Identifiers such as real name, alias, postal address, unique personal identifier, online identifier, IP address, email address, account name, SSN, driver's license number, passport number or other similar identifiers.
YES	B. Personal information, as defined in the California customer records law, such as contact (including email and telephone number) and financial information	A name, signature, physical characteristics or description, address, telephone number, education, employment, and employment history. Some personal information included in this category may overlap with other categories.

NO	C. Characteristics of protected classifications under California or federal law (if you choose to provide them), such as age, gender identity, marital status, sexual orientation, race, ancestry, national origin, religion, and medical conditions	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).
NO	D. Commercial information, such as transaction information and purchase history	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
NO	E. Biometric information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.
YES	F. Internet or network activity information, such as browsing history and interactions with our Sites and App	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
YES	G. Geolocation data, such as mobile device location	Physical location or movements.
NO	H. Audio, electronic, visual, and similar information, such as photos and videos	Audio and video information.
NO	I. Professional or employment-related information, such as work history and prior employer	Current or past job history.
NO	J. Non-public education information	Education records directly related to a student maintained by an educational institution or party acting on its behalf.
NO	K. Inferences drawn from any of the personal information listed above to create a profile or summary about, for example, an individual’s preferences and characteristics	Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

California Privacy Rights Under the CCPA

To the extent provided by law and subject to applicable exceptions, California residents have the following privacy rights in relation to the personal information we collect:

1. Right to request access to information about categories of personal information SBT has collected about you, specific pieces of personal information SBT has collected about you, categories of sources from which the personal information is collected, the business or commercial purpose for collecting personal information, and categories of third parties with whom the business shares personal information.

2. Right to request deletion of any personal information collected about you by us.

3. Right to opt-out of the sale of personal information or the sharing or personal information for cross-context behavioral advertising purposes.

4. Right against discrimination because you exercised the rights available to you.

5. Right to protection against waiver of rights.

6. Right to correct any inaccurate personal information.

7. Right to restrict sensitive personal information processing.

You can exercise these rights as further described in the "Exercising Your Rights under State Law" section below.

You can request to exercise the rights described above through contacting us as set forth in the "How to Contact Us" section below. You may request to exercise these rights by yourself or via an authorized agent who meets the agency requirements of CCPA. Once you request to exercise your rights, you agree to receive communication from us seeking information from you in order to verify your identity as the consumer from whom we have collected the personal information and other information as reasonably required to enable us to fulfill your request in our discretion. We will not fulfill any request unless you have provided sufficient information for us to reasonably verify that you are the consumer from whom we collected personal information as well as sufficient details necessary to help us handle the request.

How to Contact Us. You can call us at 1-800-979-1212, e-mail us at support@sbt.io or write to us at SBT, Attn: Privacy Dept., 15305 Dallas Parkway, Suite 1200, Addison, TX 75001. Depending on where you are located, you may also have a right to complain to your local data protection regulator.

Colorado Resident Rights

If you are a Colorado resident, you have rights as set forth under the Colorado Privacy Act ("**CPA**"). Please see the "Exercising Your Rights under State Law" section below for instructions regarding how to exercise these rights. If we are processing your personal information as a service provider, please contact the entity

that collected your personal information to address your rights with respect to such information. Additionally, please note that certain conditions and exceptions as set forth under applicable law apply to these rights, which may permit or require us to deny your request.

If there is any conflict between this section and any other provision of this Privacy Policy and you are a Colorado resident, the portion more protective of your personal information shall control with respect to such conflict.

Your rights under the CPA include:

- **Access**. You have the right to request confirmation of whether we are processing your personal information and to access such personal information.

- **Correction**. You have the right to correct inaccuracies regarding your personal information to the extent such correction is appropriate in consideration of the nature of such data and our purposes of processing such information.

- **Deletion**. You have the right to request SBT delete your personal information.

- **Portability**. You have the right to request a copy of your personal information and to receive such information in a machine-readable format, to the extent technically feasible, twice within a calendar year.

Personal Data Sales and Targeted Advertising Opt-Out and Opt-In

In this section, we use the term 'sell' as it is defined in the CPA. Subject to your right to opt out, we sell and process personal information, including for the purposes of targeted advertising.

As described in the "Information We Collect from You" section above, we have incorporated Cookies from certain third parties into the Services. These Cookies allow those third parties to receive information about your activity as described. Those third parties may use that information to provide you relevant marketing and advertisements on the Services or on other websites you visit. Under the CPA, sharing your information through third-party Cookies for online marketing and advertising may be a "sale" of information. You can opt out of these sales by following the instructions in this section.

We sell and process your personal information for the purpose of targeted advertising to the following third parties:

- Advertising partners

- Analytics partners

We sell process the following categories of your information for the purpose of targeted advertising to the third parties listed above:

- Device/IP Data
- Web Analytics

We sell and process the categories of personal information listed in the previous paragraph for the following commercial or business purposes:

- Optimizing the Services, including for testing, research, internal analytics, and product development.
- Personalizing the Services, our website, and our communications based on your preferences.
- Conducting and enhancing fraud protection, security and debugging.
- Marketing, selling, and advertising the Services.

You can opt-out of the sale or processing of personal information for these purposes through using the following methods:

- Modifying your preferences with respect to Cookies, as further described in the "Cookies" section above.
- By implementing the Global Privacy Control or similar universal privacy control legally compliant with the CPA and recognized by a government agency or industry standard. The signal issued by the control must be initiated by your browser and applies to the specific device and browser you use at the time you cast the signal. Please note this does not include Do Not Track signals.

To our knowledge, we do not sell or process for the purposes of targeted advertising the personal information of minors under 18 years of age.

Appealing a Denial

If we refuse to take action on a request to exercise your rights described above within 45 days after receiving your request in compliance with this section, you may appeal our decision by emailing SBT at support@sbt.io. In the appeal, you must (a) provide sufficient information to identify the original request and to allow us to verify that you are the individual about whom the original request pertains, and (b) provide a description of the basis of your appeal. Please note that your rights and obligations granted to you under the CPA will govern your appeal. SBT will respond to your appeal within 45 days of

receiving your request in accordance with this section. If SBT denies your appeal, you have the right to contact the Colorado Attorney General.

Connecticut Resident Rights

If you are a Connecticut resident, you have the rights set forth under the Connecticut Data Privacy Act ("**CTDPA**"). Please see the "Exercising Your Rights under State Law" section below for instructions regarding how to exercise these rights. If we are processing your personal information as a service provider, please contact the entity that collected your personal information to address your rights with respect to such information. Additionally, please note that certain conditions and exceptions as set forth under applicable law apply to these rights, which may permit or require us to deny your request.

If there is any conflict between this section and any other provision of this Privacy Policy and you are a Connecticut resident, the portion more protective of your personal information shall control with respect to such conflict.

Your rights under the CTDPA include:

- **Access**. You have the right to request confirmation of whether we are processing your personal information and to access such personal information.
- **Correction**. You have the right to correct inaccuracies regarding your personal information to the extent such correction is appropriate in consideration of the nature of such data and our purposes of processing such information.
- **Deletion**. You have the right to request SBT delete your personal information.
- **Portability**. You have the right to request a copy of your personal information that is processed automatically and receive such information in a machine-readable format, to the extent technically feasible.

Personal Data Sales and Targeted Advertising Opt-Out and Opt-In

In this section, we use the term 'sell' as it is defined in the CTDPA. Subject to your right to opt out, we sell and process personal information, including for the purposes of targeted advertising.

As described in the "Information We Collect from You" section above, we have incorporated Cookies from certain third parties into the Services. These Cookies allow those third parties to receive information about your activity as described. Those third parties may use that information to provide you relevant markets and advertisements on the Services or on other websites you visit. Under the CTDPA, sharing your information

through third-party Cookies for online marketing and advertising or user analytics may be a "sale" of information. You can opt out of these sales by following the instructions in this section.

You have the right to opt-out of the sale or processing of your personal information for the purposes of targeted advertising. You can opt-out of the sale or processing of personal information for these purposes through using the following methods:

- Modifying your preferences with respect to Cookies, as further described in the "Cookies" section above.

- By implementing the Global Privacy Control or similar universal privacy control legally compliant with the CTDPA and recognized by a government agency or industry standard. The signal issued by the control must be initiated by your browser and applies to the specific device and browser you use at the time you cast the signal. Please note this does not include Do Not Track signals.

To our knowledge, we do not sell or process for the purposes of targeted advertising the personal information of minors under 18 years of age.

Appealing a Denial

If we refuse to take action on a request to exercise your rights described above within 45 days after receiving your request in compliance with this section, you may appeal our decision by emailing SBT at support@sbt.io. In the appeal, you must (a) provide sufficient information to identify the original request and to allow us to verify that you are the individual about whom the original request pertains, and (b) provide a description of the basis of your appeal. Please note that your rights and obligations granted to you under the CTDPA will govern your appeal. SBT will respond to your appeal within 60 days of receiving your request in accordance with this section. If SBT denies your appeal, you have the right to contact the Connecticut Attorney General.

Delaware Resident Rights

If you are a Delaware resident, you have the rights set forth under the Delaware Personal Data Privacy Act ("**DPDPA**"). Please see the "Exercising Your Rights under State Law" section below for instructions regarding how to exercise these rights. If we are processing your personal information as a service provider, please contact the entity that collected your personal information to address your rights with respect to such information. Additionally, please note that certain conditions and exceptions as set forth under applicable law apply to these rights, which may permit or require us to deny your request.

If there is any conflict between this section and any other provision of this Privacy Policy and you are a Delaware resident, the portion more protective of your personal information shall control with respect to such conflict.

Your rights under the DPDPA include:

- **Access**. You have the right to request confirmation of whether we are processing your personal information and to access such personal information.
- **Correction**. You have the right to correct inaccuracies regarding your personal information to the extent such correction is appropriate in consideration of the nature of such data and our purposes of processing such information.
- **Deletion**. You have the right to request SBT delete your personal information.
- **Portability**. You have the right to obtain a copy of your personal information and receive such information in a machine-readable format, to the extent technically feasible.
- **Third-Party Information**. You have the right to request a list of third parties we have disclosed your information to.

Opt-Out of Certain Processing Activities.

SBT processes your personal information for the purpose of targeted advertising. You have the right to opt-out of SBT processing your personal information for targeted advertising purposes. You also have the right to opt-out to the sale of your personal information. Under the DPDPA, sharing your information through third-party Cookies for online marketing and advertising or user analytics may be a "sale" of information. Finally, you have the right to opt-out of SBT processing your personal information for profiling purposes, which includes using your personal information in a way that produces a legal or similarly significant effect concerning you.

To opt-out of our processing of your personal information for the purposes discussed above, please see the "Exercising Your Rights under State Law" section below.

Appealing a Denial

If we refuse to take action on a request to exercise your rights described above within 45 days after receiving your request in compliance with this section, you may appeal our decision by emailing SBT at support@sbt.io. In the appeal, you must (a) provide sufficient information to identify the original request and to allow us to verify that you are the individual about whom the original request pertains and (b) provide a description of the basis of your appeal. Please note that your rights and obligations

granted to you under the DPDPA will govern your appeal. SBT will respond to your appeal within 45 days of receiving your request in accordance with this section.

Indiana Resident Rights

If you are an **Indiana resident**, you have the rights set forth under the **Indiana Consumer Data Protection Act ("ICDPA")**. Please see the *"Exercising Your Rights under State Law"* section below for instructions regarding how to exercise these rights. If we are processing your personal information as a service provider, please contact the entity that collected your personal information to address your rights with respect to such information. Additionally, please note that certain conditions and exceptions as set forth under applicable law apply to these rights, which may permit or require us to deny your request.

If there is any conflict between this section and any other provision of this Privacy Policy and you are an Indiana resident, the portion more protective of your personal information shall control with respect to such conflict.

Your rights under the ICDPA include:

- **Access.** You have the right to request confirmation of whether we are processing your personal data and to access such personal data.

- **Correction.** You have the right to request correction of inaccuracies in the personal data you previously provided to us, taking into account the nature of the personal data and the purposes of processing.

- **Deletion.** You have the right to request deletion of your personal data that we have collected about you.

- **Portability.** You have the right to request a copy or representative summary of your personal data previously provided to us in a portable and, to the extent technically practicable, readily usable format for transmission to another controller.

Opt-Out of Certain Processing Activities.

You have the right to opt out of the processing of your personal data for:

- targeted advertising;
- the sale of personal data; and

• profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.

To opt out of our processing of your personal information for the purposes discussed above, please see the *"Exercising Your Rights under State Law"* section below.

Appealing a Denial

If we refuse to take action on a request to exercise your rights described above within the applicable response period (generally 45 days, with a possible extension), you may appeal our decision by contacting us with sufficient information to identify your original request, verify your identity, and describe the basis of your appeal. We will respond to your appeal within 60 days of receiving it in accordance with applicable law. If we deny your appeal, you have the right to contact the Indiana Attorney General as described in the ICDPA.**Iowa Resident Rights**

If you are an Iowa resident, you have the rights set forth under the Iowa Consumer Data Protection Act ("**ICDPA**"). Please see the "Exercising Your Rights under State Law" section below for instructions regarding how to exercise these rights. If we are processing your personal information as a service provider, please contact the entity that collected your personal information to address your rights with respect to such information. Additionally, please note that certain conditions and exceptions as set forth under applicable law apply to these rights, which may permit or require us to deny your request.

If there is any conflict between this section and any other provision of this Privacy Policy and you are an Iowa resident, the portion more protective of your personal information shall control with respect to such conflict.

Your rights under the ICDPA include:

- **Access**. You have the right to request confirmation of whether we are processing your personal information and to access such personal information.
- **Correction**. You have the right to correct inaccuracies regarding your personal information to the extent such correction is appropriate in consideration of the nature of such data and our purposes of processing such information.
- **Deletion**. You have the right to request SBT delete your personal information.
- **Portability**. You have the right to request a copy of your personal information and receive such information in a machine-readable format, to the extent technically feasible.

Opt-Out of Certain Processing Activities.

SBT processes your personal information for the purpose of targeted advertising. You have the right to opt-out of SBT processing your personal information for targeted advertising purposes. You also have the right to opt-out to the sale of your personal information. Under the ICDPA, sharing your information through third-party Cookies for online marketing and advertising or user analytics may be a "sale" of information. Finally, you have the right to opt-out of SBT processing your personal information for profiling purposes, which includes using your personal information in a way that produces a legal or similarly significant effect concerning you.

To opt-out of our processing of your personal information for the purposes discussed above, please see the "Exercising Your Rights under State Law" section below.

Appealing a Denial

If we refuse to take action on a request to exercise your rights described above within 90 days after receiving your request in compliance with this section, you may appeal our decision by emailing SBT at support@sbt.io. In the appeal, you must (a) provide sufficient information to identify the original request and to allow us to verify that you are the individual about whom the original request pertains and (b) provide a description of the basis of your appeal. Please note that your rights and obligations granted to you under the ICDPA will govern your appeal. SBT will respond to your appeal within 60 days of receiving your request in accordance with this section. If SBT denies your appeal, you have the right to contact the Iowa Attorney General using the methods described at https://www.iowaattorneygeneral.gov/for-consumers/file-a-consumer-complaint.

Kentucky Resident Rights

If you are a **Kentucky resident**, you have the rights set forth under the **Kentucky Consumer Data Protection Act ("KCDPA").** Please see the *"Exercising Your Rights under State Law"* section below for instructions regarding how to exercise these rights. If we are processing your personal information as a service provider, please contact the entity that collected your personal information to address your rights with respect to such information. Additionally, please note that certain conditions and exceptions as set forth under applicable law apply to these rights, which may permit or require us to deny your request.

If there is any conflict between this section and any other provision of this Privacy Policy and you are a Kentucky resident, the portion more protective of your personal information shall control with respect to such conflict.

Your rights under the KCDPA include:

- **Access.** You have the right to request confirmation of whether we are processing your personal data and to access that personal data.

• **Correction.** You have the right to request correction of inaccurate personal data we maintain about you, taking into account the nature of the data and the purposes for processing.

• **Deletion.** You have the right to request that we delete personal data we have collected about you. https://apps.legislature.ky.gov/record/24rs/hb15.html?utm_source=chatgpt.com

• **Portability.** You have the right to request a copy of personal data you previously provided to us in a portable and, to the extent technically practicable, readily usable format for transmission to another controller.

Opt-Out of Certain Processing Activities.
You have the right to opt out of the processing of your personal data for:

• targeted advertising;
• the sale of personal data (exchange of personal data for monetary consideration); and
• profiling in furtherance of automated decisions that produce legal or similarly significant effects concerning you.

To opt out of our processing of your personal information for the purposes discussed above, please see the *"Exercising Your Rights under State Law"* section below.

Appealing a Denial

If we refuse to take action on a request to exercise your rights described above within the applicable response period under Kentucky law, you may appeal our decision by contacting us with sufficient information to identify your original request, verify your identity, and describe the basis of your appeal. We will respond to your appeal within the timeline required by the KCDPA. If we deny your appeal, you have the right to contact the **Kentucky Attorney General** to seek enforcement or file a complaint.

Maryland Resident Rights

If you are a **Maryland resident**, you have the rights set forth under the **Maryland Online Data Privacy Act ("MODPA").** Please see the *"Exercising Your Rights under State Law"* section below for instructions regarding how to exercise these rights. If we are processing your personal information as a service provider, please contact the entity that collected your personal information to address your rights with respect to such information. Additionally, please note that certain conditions and exceptions as set forth under applicable law apply to these rights, which may permit or require us to deny your request.

If there is any conflict between this section and any other provision of this Privacy Policy and you are a Maryland resident, the portion more protective of your personal information shall control with respect to such conflict.

Your rights under the MODPA include:

- **Access.** You have the right to request confirmation of whether we are processing your personal data and to access such personal data.

- **Correction.** You have the right to request correction of inaccuracies in your personal data to the extent such correction is appropriate in consideration of the nature of the data and our purposes of processing such information.

- **Deletion.** You have the right to request deletion of your personal data.

- **Portability.** You have the right to request a copy of your personal data in a portable and, to the extent technically practicable, readily usable format for transmission to another controller.

Opt-Out of Certain Processing Activities.

You have the right to opt out of the processing of your personal data for:

- the sale of personal data;
- targeted advertising; and
- profiling conducted for decisions that produce legal or similarly significant effects concerning you.

This includes the right to opt out through recognized universal opt-out mechanisms or signals and to designate an authorized agent to act on your behalf to opt out.

To opt out of our processing of your personal information for the purposes discussed above, please see the *"Exercising Your Rights under State Law"* section below.

Appealing a Denial

If we refuse to take action on a request to exercise your rights described above within the applicable response period under Maryland law, you may appeal our decision by contacting us with sufficient information to identify your original request, verify your identity, and describe the basis of your appeal. Covered entities generally have a set timeframe to respond and may extend it under certain conditions. If we deny your appeal, you have the right to contact the **Maryland Attorney General's Office** as described in the MODPA.

Minnesota Resident Rights

If you are a **Minnesota resident**, you have the rights set forth under the **Minnesota Consumer Data Privacy Act ("MCDPA")**. Please see the **"Exercising Your Rights under State Law"** section below for instructions regarding how to exercise these rights. If we are processing your personal information as a **service provider**, please contact the entity that collected your personal information to address your rights with respect to such information. Additionally, please note that certain conditions and exceptions as set forth under applicable law apply to these rights, which may permit or require us to deny your request.

If there is any conflict between this section and any other provision of this Privacy Policy and you are a Minnesota resident, **the portion more protective of your personal information shall control** with respect to such conflict.

Your rights under the MCDPA include:

- **Access.** You have the right to request confirmation of whether we are processing your personal information and to access such personal information.
- **Correction.** You have the right to correct inaccuracies regarding your personal information, taking into account the nature of the data and our purposes for processing such information.
- **Deletion.** You have the right to request that we delete your personal information.
- **Portability.** You have the right to request a copy of your personal information that is processed automatically and receive such information in a portable and, to the extent technically feasible, readily usable format.

Personal Data Sales and Targeted Advertising Opt-Out

In this section, we use the term **"sell"** as it is defined under the MCDPA. Subject to your right to opt out, we may process personal information, including for purposes of **targeted advertising**.

As described in the **"Information We Collect from You"** section above, we may use Cookies or similar technologies provided by third parties. These technologies may allow third parties to receive information about your activity on our Services. Under the MCDPA, certain disclosures of personal information for advertising or analytics purposes may constitute a "sale" or targeted advertising.

You have the right to **opt out of the sale of your personal information or its processing for targeted advertising purposes**. You may exercise this right by:

- Modifying your Cookie preferences, as described in the **"Cookies"** section above; or
- Using a **legally recognized universal opt-out mechanism**, such as the Global Privacy Control, where supported. Signals must be browser- and device-specific and do not include Do Not Track signals.

To our knowledge, we do not sell or process for targeted advertising purposes the personal information of **known minors under 18 years of age**.

Appealing a Denial

If we refuse to take action on a request to exercise your rights described above within **45 days** after receiving your request in compliance with this section, you may **appeal our decision** by emailing **SBT at support@sbt.io**.

In your appeal, you must:
(a) provide sufficient information to identify the original request and verify your identity; and
(b) describe the basis for your appeal.

SBT will respond to your appeal within **60 days** of receiving it. If your appeal is denied, you have the right to **contact the Minnesota Attorney General** to submit a complaint.

Montana Resident Rights

If you are a Montana resident, you have the rights set forth under the Montana Consumer Data Privacy Act ("**MTCDPA**"). Please see the "Exercising Your Rights under State Law" section below for instructions regarding how to exercise these rights. If we are processing your personal information as a service provider, please contact the entity that collected your personal information to address your rights with respect to such information. Additionally, please note that certain conditions and exceptions as set forth under applicable law apply to these rights, which may permit or require us to deny your request.

If there is any conflict between this section and any other provision of this Privacy Policy and you are a Montana resident, the portion more protective of your personal information shall control with respect to such conflict.

Your rights under the MTCDPA include:

- **Access**. You have the right to request confirmation of whether we are processing your personal information and to access such personal information.
- **Correction**. You have the right to correct inaccuracies regarding your personal information to the extent such correction is appropriate in consideration of the nature of such data and our purposes of processing such information.
- **Deletion**. You have the right to request SBT delete your personal information.

- **Portability**. You have the right to request a copy of your personal information and receive such information in a machine-readable format, to the extent technically feasible.

Opt-Out of Certain Processing Activities.

SBT processes your personal information for the purpose of targeted advertising. You have the right to opt-out of SBT processing your personal information for targeted advertising purposes. You also have the right to opt-out to the sale of your personal information. Under the MTCDPA, sharing your information through third-party Cookies for online marketing and advertising or user analytics may be a "sale" of information. Finally, you have the right to opt-out of SBT processing your personal information for profiling purposes, which includes using your personal information in a way that produces a legal or similarly significant effect concerning you.

To opt-out of our processing of your personal information for the purposes discussed above, please see the "Exercising Your Rights under State Law" section below.

Appealing a Denial

If we refuse to take action on a request to exercise your rights described above within 45 days after receiving your request in compliance with this section, you may appeal our decision by emailing SBT at support@sbt.io. In the appeal, you must (a) provide sufficient information to identify the original request and to allow us to verify that you are the individual about whom the original request pertains and (b) provide a description of the basis of your appeal. Please note that your rights and obligations granted to you under the MTCDPA will govern your appeal. SBT will respond to your appeal within 60 days of receiving your request in accordance with this section. If SBT denies your appeal, you have the right to contact the Montana Attorney General using the methods described at https://dojmt.gov/consumer/consumer-complaints/.

Nebraska Resident Rights

If you are a Nebraska resident, you have the rights set forth under the Nebraska Data Privacy Act ("**NDPA**"). Please see the "Exercising Your Rights under State Law" section below for instructions regarding how to exercise these rights. If we are processing your personal information as a service provider, please contact the entity that collected your personal information to address your rights with respect to such information. Additionally, please note that certain conditions and exceptions as set forth under applicable law apply to these rights, which may permit or require us to deny your request.

If there is any conflict between this section and any other provision of this Privacy Policy and you are a Nebraska resident, the portion more protective of your personal information shall control with respect to such conflict.

Your rights under the NDPA include:

- **Access**. You have the right to request confirmation of whether we are processing your personal information and to access such personal information.

- **Correction**. You have the right to correct inaccuracies regarding your personal information to the extent such correction is appropriate in consideration of the nature of such data and our purposes of processing such information.

- **Deletion**. You have the right to request SBT delete your personal information.

- **Portability**. You have the right to request a copy of your personal information and receive such information in a machine-readable format, to the extent technically feasible.

Opt-Out of Certain Processing Activities.

SBT processes your personal information for the purpose of targeted advertising. You have the right to opt-out of SBT processing your personal information for targeted advertising purposes. You also have the right to opt-out to the sale of your personal information. Under the NDPA, sharing your information through third-party Cookies for online marketing and advertising or user analytics may be a "sale" of information. Finally, you have the right to opt-out of SBT processing your personal information for profiling purposes, which includes using your personal information in a way that produces a legal or similarly significant effect concerning you.

To opt-out of our processing of your personal information for the purposes discussed above, please see the "Exercising Your Rights under State Law" section below.

Appealing a Denial

If we refuse to take action on a request to exercise your rights described above within 45 days after receiving your request in compliance with this section, you may appeal our decision by emailing SBT at support@sbt.io. In the appeal, you must (a) provide sufficient information to identify the original request and to allow us to verify that you are the individual about whom the original request pertains and (b) provide a description of the basis of your appeal. Please note that your rights and obligations granted to you under the NDPA will govern your appeal. SBT will respond to your appeal within 60 days of receiving your request in accordance with this section. If SBT denies your appeal, you have the right to

contact the Nebraska Attorney General using the methods described at https://ago.nebraska.gov/constituent-complaint-form.

New Hampshire Resident Rights

If you are a New Hampshire resident, you have the rights set forth under the New Hampshire Privacy Act ("**NHPA**"). Please see the "Exercising Your Rights under State Law" section below for instructions regarding how to exercise these rights. If we are processing your personal information as a service provider, please contact the entity that collected your personal information to address your rights with respect to such information. Additionally, please note that certain conditions and exceptions as set forth under applicable law apply to these rights, which may permit or require us to deny your request.

If there is any conflict between this section and any other provision of this Privacy Policy and you are a New Hampshire resident, the portion more protective of your personal information shall control with respect to such conflict.

Your rights under the NHPA include:

- **Access**. You have the right to request confirmation of whether we are processing your personal information and to access such personal information.
- **Correction**. You have the right to correct inaccuracies regarding your personal information to the extent such correction is appropriate in consideration of the nature of such data and our purposes of processing such information.
- **Deletion**. You have the right to request SBT delete your personal information.
- **Portability**. You have the right to request a copy of your personal information and receive such information in a machine-readable format, to the extent technically feasible.

Opt-Out of Certain Processing Activities.

SBT processes your personal information for the purpose of targeted advertising. You have the right to opt-out of SBT processing your personal information for targeted advertising purposes. You also have the right to opt-out to the sale of your personal information. Under the NHPA, sharing your information through third-party Cookies for online marketing and advertising or user analytics may be a "sale" of information. Finally, you have the right to opt-out of SBT processing your personal information for profiling purposes, which includes using your personal information in a way that produces a legal or similarly significant effect concerning you.

To opt-out of our processing of your personal information for the purposes discussed above, please see the "Exercising Your Rights under State Law" section below.

Appealing a Denial

If we refuse to take action on a request to exercise your rights described above within 45 days after receiving your request in compliance with this section, you may appeal our decision by emailing SBT at support@sbt.io In the appeal, you must (a) provide sufficient information to identify the original request and to allow us to verify that you are the individual about whom the original request pertains and (b) provide a description of the basis of your appeal. Please note that your rights and obligations granted to you under the NHPA will govern your appeal. SBT will respond to your appeal within 60 days of receiving your request in accordance with this section. If SBT denies your appeal, you have the right to contact the New Hampshire Attorney General using the methods described at https://www.doj.nh.gov/citizens/consumer-protection-antitrust-bureau/consumer-complaints.

New Jersey Resident Rights

If you are a New Jersey resident, you have the rights set forth under the New Jersey Data Privacy Act ("**NJDPA**"). Please see the "Exercising Your Rights under State Law" section below for instructions regarding how to exercise these rights. If we are processing your personal information as a service provider, please contact the entity that collected your personal information to address your rights with respect to such information. Additionally, please note that certain conditions and exceptions as set forth under applicable law apply to these rights, which may permit or require us to deny your request.

If there is any conflict between this section and any other provision of this Privacy Policy and you are a New Jersey resident, the portion more protective of your personal information shall control with respect to such conflict.

Your rights under the NJDPA include:

- **Access**. You have the right to request confirmation of whether we are processing your personal information and to access such personal information.
- **Correction**. You have the right to correct inaccuracies regarding your personal information to the extent such correction is appropriate in consideration of the nature of such data and our purposes of processing such information.
- **Deletion**. You have the right to request SBT delete your personal information.

- **Portability**. You have the right to request a copy of your personal information and receive such information in a machine-readable format, to the extent technically feasible.

Opt-Out of Certain Processing Activities.

SBT processes your personal information for the purpose of targeted advertising. You have the right to opt-out of SBT processing your personal information for targeted advertising purposes. You also have the right to opt-out to the sale of your personal information. Under the NJDPA, sharing your information through third-party Cookies for online marketing and advertising or user analytics may be a "sale" of information. Finally, you have the right to opt-out of SBT processing your personal information for profiling purposes, which includes using your personal information in a way that produces a legal or similarly significant effect concerning you.

To opt-out of our processing of your personal information for the purposes discussed above, please see the "Exercising Your Rights under State Law" section below.

Appealing a Denial

If we refuse to take action on a request to exercise your rights described above within 45 days after receiving your request in compliance with this section, you may appeal our decision by emailing SBT at support@sbt.io. In the appeal, you must (a) provide sufficient information to identify the original request and to allow us to verify that you are the individual about whom the original request pertains and (b) provide a description of the basis of your appeal. Please note that your rights and obligations granted to you under the NJDPA will govern your appeal. SBT will respond to your appeal within 45 days of receiving your request in accordance with this section. If SBT denies your appeal, you have the right to contact the New Jersey Division of Consumer Affairs using the methods described at https://www.njconsumeraffairs.gov/Pages/Consumer-Complaints.aspx.

Oregon Resident Rights

If you are an Oregon resident, you have the rights set forth under the Oregon Consumer Privacy Act ("**OCPA**"). Please see the "Exercising Your Rights under State Law" section below for instructions regarding how to exercise these rights. If we are processing your personal information as a service provider, please contact the entity that collected your personal information to address your rights with respect to such information. Additionally, please note that certain conditions and exceptions as set forth under applicable law apply to these rights, which may permit or require us to deny your request.

If there is any conflict between this section and any other provision of this Privacy Policy and you are an Oregon resident, the portion more protective of your personal information shall control with respect to such conflict.

Your rights under the OCPA include:

- **Access**. You have the right to request confirmation of whether we are processing your personal information and to access such personal information.
- **Third-Party Information**. You have the right to request a list of third parties we have disclosed your information to.
- **Correction**. You have the right to correct inaccuracies regarding your personal information to the extent such correction is appropriate in consideration of the nature of such data and our purposes of processing such information.
- **Deletion**. You have the right to request SBT delete your personal information.
- **Portability**. You have the right to request a copy of your personal information and receive such information in a machine-readable format, to the extent technically feasible.

Please note that we may charge a reasonable fee to comply with your requests.

Opt-Out of Certain Processing Activities.

SBT processes your personal information for the purpose of targeted advertising. You have the right to opt-out of SBT processing your personal information for targeted advertising purposes. You also have the right to opt-out to the sale of your personal information. Under the OCPA, sharing your information through third-party Cookies for online marketing and advertising or user analytics may be a "sale" of information. Finally, you have the right to opt-out of SBT processing your personal information for profiling purposes, which includes using your personal information in a way that produces a legal or similarly significant effect concerning you.

To opt-out of our processing of your personal information for the purposes discussed above, please see the "Exercising Your Rights under State Law" section below.

Appealing a Denial

If we refuse to take action on a request to exercise your rights described above within 45 days after receiving your request in compliance with this section, you may appeal our decision by emailing SBT at support@sbt.io. In the appeal, you must (a) provide sufficient information to identify the original request and to allow us to verify that you are the individual about whom the original request pertains

and (b) provide a description of the basis of your appeal. Please note that your rights and obligations granted to you under the OCPA will govern your appeal. SBT will respond to your appeal within 45 days of receiving your request in accordance with this section. If SBT denies your appeal, you have the right to contact the Oregon Attorney General using the methods described at https://www.doj.state.or.us/consumer-protection/contact-us/.

Rhode Island Resident Rights

If you are a **Rhode Island resident**, you have the rights set forth under the **Rhode Island Data Transparency and Privacy Protection Act ("RIDTPPA")**. Please see the *"Exercising Your Rights under State Law"* section below for instructions regarding how to exercise these rights. If we are processing your personal information as a service provider, please contact the entity that collected your personal information to address your rights with respect to such information. Additionally, please note that certain conditions and exceptions as set forth under applicable law apply to these rights, which may permit or require us to deny your request.

If there is any conflict between this section and any other provision of this Privacy Policy and you are a Rhode Island resident, the portion more protective of your personal information shall control with respect to such conflict.

Your rights under the RIDTPPA include:

- **Access.** You have the right to request confirmation of whether we are processing your personal data and to access such personal data.

- **Correction.** You have the right to request correction of inaccuracies in your personal data maintained by us.

- **Deletion.** You have the right to request deletion of your personal data that we have collected about you, subject to legal or contractual limitations.

- **Portability.** You have the right to request a copy of your personal data previously provided to us in a portable and, to the extent technically practicable, readily usable format for transmission to another controller.

Opt-Out of Certain Processing Activities**.**
You have the right to opt out of the processing of your personal data for:

• the sale of personal data;
• targeted advertising; and
• profiling used for automated decisions that produce legal or similarly significant effects concerning you.

To opt out of our processing of your personal information for the purposes discussed above, please see the *"Exercising Your Rights under State Law"* section below.

Appealing a Denial

If we refuse to take action on a request to exercise your rights described above within the applicable response period, you may appeal our decision by contacting us with sufficient information to identify your original request, verify your identity, and describe the basis of your appeal. We will respond to your appeal within the timeframe required by Rhode Island law. If we deny your appeal, you have the right to contact the **Rhode Island Attorney General's Office** as described in the RIDTPPA.

Tennessee Resident Rights

If you are a **Tennessee resident**, you have the rights set forth under the **Tennessee Information Protection Act ("TIPA").** Please see the *"Exercising Your Rights under State Law"* section below for instructions regarding how to exercise these rights. If we are processing your personal information as a service provider, please contact the entity that collected your personal information to address your rights with respect to such information. Additionally, please note that certain conditions and exceptions as set forth under applicable law apply to these rights, which may permit or require us to deny your request.

If there is any conflict between this section and any other provision of this Privacy Policy and you are a Tennessee resident, the portion more protective of your personal information shall control with respect to such conflict.

Your rights under TIPA include:

• **Access.** You have the right to request confirmation of whether we are processing your personal data and to access such personal data.

• **Correction.** You have the right to request correction of inaccuracies in your personal data to the extent such correction is appropriate in consideration of the nature of the data and our purposes for processing such information.

• **Deletion.** You have the right to request deletion of your personal data that we have collected about you.

• **Portability.** You have the right to request a copy of your personal data previously provided to us in a portable and, to the extent technically practicable, readily usable format for transmission to another controller.

Opt-Out of Certain Processing Activities.

You have the right to opt out of the processing of your personal data for:

• the sale of personal data;
• targeted advertising; and
• profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.

To opt out of our processing of your personal information for the purposes discussed above, please see the *"Exercising Your Rights under State Law"* section below.

Additional Consumer Rights & Protections

• **Sensitive Data Opt-In.** Under TIPA, we must obtain your consent before processing your sensitive personal data (such as information about your race, religion, health, sexual orientation, biometric data, precise geolocation, etc.).
• **Nondiscrimination.** We will not discriminate against you for exercising your rights under TIPA.

Appealing a Denial

If we refuse to take action on a request to exercise your rights described above within the applicable response period (generally 45 days, with a potential extension of up to 45 days), you may appeal our decision by contacting us with sufficient information to identify your original request, verify your identity, and provide a description of the basis of your appeal. We will respond to your appeal within the timeframe required by TIPA. If we deny your appeal, you have the right to contact the **Tennessee Attorney General's Office** as described in the Tennessee Information Protection Act.

Texas Resident Rights

If you are a Texas resident, you have the rights set forth under the Texas Data Privacy and Security Act ("**TDPSA**"). Please see the "Exercising Your Rights under State Law" section below for instructions regarding how to exercise these rights. If we are processing your personal information as a service provider, please contact the entity that collected your personal information to address your rights with respect to such

information. Additionally, please note that certain conditions and exceptions as set forth under applicable law apply to these rights, which may permit or require us to deny your request.

If there is any conflict between this section and any other provision of this Privacy Policy and you are a Texas resident, the portion more protective of your personal information shall control with respect to such conflict.

Your rights under the TDPSA include:

- **Access**. You have the right to request confirmation of whether we are processing your personal information and to access such personal information.
- **Correction**. You have the right to correct inaccuracies regarding your personal information to the extent such correction is appropriate in consideration of the nature of such data and our purposes of processing such information.
- **Deletion**. You have the right to request SBT delete your personal information.
- **Portability**. You have the right to request a copy of your personal information and receive such information in a machine-readable format, to the extent technically feasible.

Opt-Out of Certain Processing Activities.

SBT processes your personal information for the purpose of targeted advertising. You have the right to opt-out of SBT processing your personal information for targeted advertising purposes. You also have the right to opt-out to the sale of your personal information. Under the TDPSA, sharing your information through third-party Cookies for online marketing and advertising or user analytics may be a "sale" of information. Finally, you have the right to opt-out of SBT processing your personal information for profiling purposes, which includes using your personal information in a way that produces a legal or similarly significant effect concerning you.

To opt-out of our processing of your personal information for the purposes discussed above, please see the "Exercising Your Rights under State Law" section below.

Appealing a Denial

If we refuse to take action on a request to exercise your rights described above within 45 days after receiving your request in compliance with this section, you may appeal our decision by emailing SBT at support@sbt.io. In the appeal, you must (a) provide sufficient information to identify the original request and to allow us to verify that you are the individual about whom the original request pertains and (b) provide a description of the basis of your appeal. Please note that your rights and obligations

granted to you under the TDPSA will govern your appeal. SBT will respond to your appeal within 60 days of receiving your request in accordance with this section. If SBT denies your appeal, you have the right to contact the Texas Attorney General using the methods described at https://www.texasattorneygeneral.gov/consumer-protection/file-consumer-complaint.

Utah Resident Rights

If you are a Utah resident, you have the rights set forth under the Utah Consumer Privacy Act ("**UCPA**"). Please see the "Exercising Your Rights under State Law" section below for instructions regarding how to exercise these rights. If we are processing your personal information as a service provider, please contact the entity that collected your personal information to address your rights with respect to such information. Additionally, please note that certain conditions and exceptions as set forth under applicable law apply to these rights, which may permit or require us to deny your request.

If there is any conflict between this section and any other provision of this Privacy Policy and you are a Utah resident, the portion more protective of your personal information shall control with respect to such conflict.

Your rights under the UCPA include:

- **Access**. You have the right to request confirmation of whether we are processing your personal information and to access such personal information.
- **Correction**. You have the right to correct inaccuracies regarding your personal information to the extent such correction is appropriate in consideration of the nature of such data and our purposes of processing such information.
- **Deletion**. You have the right to request SBT delete your personal information.
- **Portability**. You have the right to request a copy of your personal information and receive such information in a machine-readable format, to the extent technically feasible.

Opt-Out of Certain Processing Activities.

SBT processes your personal information for the purpose of targeted advertising. You have the right to opt-out of SBT processing your personal information for targeted advertising purposes. You also have the right to opt-out to the sale of your personal information.

To opt-out of our processing of your personal information for the purposes discussed above, please see the "Exercising Your Rights under State Law" section below.

We will respond to any of your requests under this "Utah Resident Rights" section within 45 days of receiving your request.

Virginia Resident Rights

If you are a Virginia resident, you have the rights set forth under the Virginia Consumer Data Protection Act ("**VCDPA**"). Please see the "Exercising Your Rights under State Law" section below for instructions regarding how to exercise these rights. If we are processing your personal information as a service provider, please contact the entity that collected your personal information to address your rights with respect to such information. Additionally, please note that certain conditions and exceptions as set forth under applicable law apply to these rights, which may permit or require us to deny your request.

If there is any conflict between this section and any other provision of this Privacy Policy and you are a Virginia resident, the portion more protective of your personal information shall control with respect to such conflict.

Your rights under the VCDPA include:

- **Access**. You have the right to request confirmation of whether we are processing your personal information and to access such personal information.
- **Correction**. You have the right to correct inaccuracies regarding your personal information to the extent such correction is appropriate in consideration of the nature of such data and our purposes of processing such information.
- **Deletion**. You have the right to request SBT delete your personal information.
- **Portability**. You have the right to request a copy of your personal information and receive such information in a machine-readable format, to the extent technically feasible.

Opt-Out of Certain Processing Activities.

SBT processes your personal information, including for the purpose of targeted advertising. You have the right to opt-out of SBT processing your personal information for targeted advertising purposes. To opt-out of our processing of your personal information for targeted advertising purposes, please see the "Exercising Your Rights under State Law" section below.

You also have the right to opt-out to the sale of your personal information.

Appealing a Denial

If we refuse to take action on a request to exercise your rights described above within 45 days after receiving your request in compliance with this section, you may appeal our decision through emailing SBT at support@sbt.io. In the appeal, you must (a) provide sufficient information to identify the original request and to allow us to verify that you are the individual about whom the original request pertains, and (b) provide a description of the basis of your appeal. Please note that your rights and obligations granted to you under the VCDPA will govern your appeal. SBT will respond to your appeal within 45 days of receiving your request in accordance with this section. If SBT denies your appeal, you have the right to contact the Virginia Attorney General using the methods described at https://www.oag.state.va.us/consumer-protection/index.php/file-a-complaint.

Exercising Your Rights under State Law

You can request to exercise the rights granted to you under the CCPA, CPA, CTDPA, DPDPA, ICDPA, MTCDPA, NDPA, NHPA, NJDPA, OCPA, TDPSA, UCPA, or VCDPA, as applicable, as set forth above in the "How to Contact Us" section below. You may request to exercise these rights by yourself or via an authorized agent who meets the agency requirements of the applicable law or regulation. Once you submit a request to exercise your rights, you agree to receive communications from SBT to verify your identity as the individual from whom we collected the personal information and to request other information as reasonably required to enable us to fulfill your request. We will not fulfill any request unless you have provided sufficient information for us as described in the previous sentence as well as sufficient details necessary to help us handle the request.

If you make any request with respect to any personal information SBT received from a SBT Customer, we may direct you to the applicable SBT Customer or provide your request to the SBT Customer and the SBT Customer will contact you directly. Depending on the applicable law and the applicable agreement in place between SBT and the SBT Customer, SBT may not be able to directly respond to your requests without the SBT Customer's authorization.

How to Contact Us. You can call us at 1-800-979-1212, e-mail us at support@sbt.io or write to us at SBT, Attn: Privacy Dept., 15305 Dallas Parkway, Suite 1200, Addison, TX 75001. Depending on where you are located, you may also have a right to complain to your local data protection regulator.

Outside of the United States

European Union & United Kingdom Resident Rights (GDPR)

If you are located in the **European Economic Area ("EEA") or the United Kingdom**, you have the rights set forth under the **General Data Protection Regulation ("GDPR")** and, where applicable, the **UK**

GDPR. Please see the **"Exercising Your Rights under International Law"** section below for instructions on how to exercise these rights.
— GDPR Arts. 3, 12

If we are processing your personal data as a **processor or service provider**, please contact the entity that collected your personal data to exercise your rights with respect to such data. Certain conditions and exceptions under applicable law may apply that permit or require us to deny or limit your request.
— GDPR Arts. 12(5), 28

If there is any conflict between this section and any other provision of this Privacy Policy and you are an EEA or UK resident, **the provision more protective of your personal data shall control**.

Your rights under GDPR include:

- **Access.**
  You have the right to request confirmation of whether your personal data is being processed and to access such personal data.
  — GDPR Art. 15
- **Correction (Rectification).**
  You have the right to request correction of inaccurate or incomplete personal data.
  — GDPR Art. 16
- **Deletion (Right to Erasure).**
  You have the right to request deletion of your personal data, subject to legal exceptions.
  — GDPR Art. 17
- **Portability.**
  You have the right to request a copy of your personal data in a structured, commonly used, and machine-readable format, where applicable.
  — GDPR Art. 20
- **Objection & Restriction.**
  You have the right to object to or request restriction of certain processing activities, including processing based on legitimate interests or for direct marketing.
  — GDPR Arts. 18, 21
- **Withdrawal of Consent.**
  Where processing is based on consent, you have the right to withdraw your consent at any time.
  — GDPR Art. 7(3)

Canadian Residents
Anti-Spam (CASL)

Our services are designed to enable lawful messaging practices, including compliance with Canada's Anti-Spam Legislation (CASL).

Customer Responsibility: We do not control the content or recipients of messages sent through our platform. Customers are solely responsible for ensuring that all commercial electronic messages (CEMs) sent to Canadian recipients comply with CASL requirements, including:

- Obtaining valid consent (express or implied) before sending messages.
- Including accurate sender identification and a functional unsubscribe mechanism in each message.
- Maintaining records of consent and unsubscribe requests.

- **Our Role**: We provide tools and features to assist customers in meeting these obligations (e.g., opt-in management, unsubscribe functionality), but the ultimate responsibility for CASL compliance rests with the sender.
- **CASL Software Installation Rule.** Our software does not automatically install components on users' devices. If any installation is required, express user consent is obtained in compliance with CASL.

Privacy (PIPEDA)

If our services process personal information of individuals located in Canada, we do so in accordance with the Personal Information Protection and Electronic Documents Act (PIPEDA).

- **Service Provider Role**: We act as a service provider (processor) on behalf of our customers and process personal information only as instructed by them.
- **Cross-Border Transfers**: Personal information may be transferred outside Canada for hosting or processing. We implement contractual and technical safeguards to ensure comparable protection.
- **Individual Rights**: Individuals seeking to exercise rights under PIPEDA (such as access, correction, or withdrawal of consent) should contact the sender directly. We will assist our customers in responding to such requests as required.
- **Security Measures**: We maintain administrative, technical, and physical safeguards to protect personal information against unauthorized access, disclosure, or misuse.

Mexico Resident Rights

If you are a resident of **Mexico**, you have the rights set forth under the **Federal Law on the Protection of Personal Data Held by Private Parties** (*Ley Federal de Protección de Datos Personales en Posesión de los Particulares*, "**LFPDPPP**").

— LFPDPPP, Arts. 1, 22

If we are processing your personal data as a **service provider (Encargado)**, please contact the entity that collected your personal data to exercise your rights with respect to such data. Certain conditions and exceptions under applicable law may apply that permit or require us to deny or redirect your request.
— LFPDPPP, Arts. 28, 35

If there is any conflict between this section and any other provision of this Privacy Policy and you are a Mexico resident, **the provision more protective of your personal data shall control**.

Your rights under LFPDPPP include (ARCO Rights):

- **Access.** You have the right to access your personal data and obtain information about how it is processed.
  — LFPDPPP, Art. 22
- **Correction (Rectification).** You have the right to request correction of inaccurate or incomplete personal data.
  — LFPDPPP, Art. 22
- **Deletion (Cancellation).** You have the right to request deletion or cancellation of your personal data, subject to legal exceptions.
  — LFPDPPP, Arts. 22–26
- **Opposition.** You have the right to object to the processing of your personal data for legitimate reasons.
  — LFPDPPP, Art. 22

Privacy Policy Updates

By using the Services or, if required by laws applicable to you, opting into this Privacy Policy, you signify your acceptance of this Privacy Policy. If you do not agree to this Privacy Policy, please do not use the Services. SBT may change this Privacy Policy from time to time by posting changes at https://sbt.io/privacy-policy/ and may send notification emails regarding such changes. Your continued use of the Services following the posting of such changes will be deemed your acceptance of those changes, unless applicable law requires additional consent.

Contact Us

If you have questions or comments about this Privacy Policy, or if you would like to exercise your rights and choices, please contact SBT at privacy@sbt.io, or write to us at: SBT, Attn: Privacy, 15305 Dallas Parkway, Ste 1200, Addison, TX 75001.

Click to download a copy of this Privacy Policy