

Privacy Policy

Effective date: 01-Jan-2021

Helpshift, Inc. (“Helpshift”, “we”, “us” or “our”) knows that you care about how your personal information is used and shared, and we take your privacy seriously. Accordingly, we have implemented this Privacy Statement to inform you of the information that we collect from you when you visit our website www.helpshift.com and its sub-domains (the “Website”) or use the Helpshift services, applications and/or their related features (the “Services”), what we do with it and how you can exercise your privacy rights.

By using or accessing our Website and/or Services in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that we will collect, use and share your information as described in this Privacy Policy.

This Privacy Policy covers only how we, at Helpshift, treat your personal data, but it does not cover how any third parties, including Helpshift’s customers, may treat your Personal Data. We have identified below which of your Personal Data we collect on our own behalf and which of your Personal Data we collect on behalf of our customers. If you are an individual whose Personal Data has been collected through the Services (e.g., you have submitted a support request to a company that uses our customer support technology) then we are acting as a data processor or service provider on behalf of such company, and you should contact the company (our customer) that provided you access to Helpshift’s Services to address your rights with respect to such data and they will respond to you accordingly. We will provide assistance to our customers to address any concerns you may have in accordance with the terms of our contract with such customer.

You may print a copy of this Privacy Policy by clicking [here](#). If you have a disability, you may access this Privacy Policy in an alternative format by contacting privacy@helpshift.com.

Privacy Policy Table of Contents

What this Privacy Policy Covers

Personal Data

- Categories of Personal Data We Collect*
- Categories of Sources of Personal Data*
- Our Commercial or Business Purposes for Collecting Personal Data*

How We Share Your Personal Data

Tracking Tools and Opt-Out

Data Security and Retention

Personal Data of Children

California Resident Rights

Other State Law Privacy Rights

European Union Data Subject Rights

Changes to this Privacy Policy

Contact Information

What this Privacy Policy Covers

This Privacy Policy covers how we treat Personal Data that we gather when you access or use our Website and/or Services. “Personal Data” means any information that identifies or relates to a particular

individual and also includes information referred to as “personally identifiable information” or “personal information” under applicable data privacy laws, rules or regulations. This Privacy Policy does not cover the practices of companies we don’t own or control or people we don’t manage.

Personal Data

Categories of Personal Data We Collect

This chart details the categories of Personal Data that we collect and have collected over the past 12 months through your use of our Services. **Helpshift acts as processor or service provider only with respect to this data:**

<u>Category of Personal Data</u>	<u>Examples of Personal Data We Collect</u>	<u>Categories of Third Parties With Whom We Share this Personal Data:</u>
Profile or Contact Data	<ul style="list-style-type: none"> • First and last name • Email address • Phone number • Mailing address 	<ul style="list-style-type: none"> • Service Providers • Customer
Online Identifiers	<ul style="list-style-type: none"> • Unique identifiers such as email IDs 	<ul style="list-style-type: none"> • Service Providers • Customer
Identifiers	<ul style="list-style-type: none"> • Customer number 	<ul style="list-style-type: none"> • Customer
Online Presence	<ul style="list-style-type: none"> • Information about your active status or presence on the Helpshift Agent Dashboard, including whether you are currently active online 	
Social Network Data	<ul style="list-style-type: none"> • Email • Phone number • User name on the social network • IP address • Device ID 	<ul style="list-style-type: none"> • Service Providers • Customer
Other Identifying Information that You Voluntarily Choose to Provide	<ul style="list-style-type: none"> • In the course of using our Services, you (as an end user of our customer) may submit or upload certain content, communications, data, attachments or files to our Services for hosting and processing by us. For example, if an end-user communicates with our customer’s support staff using Helpshift’s In-App Chat features, then we will process the end-user’s name, email address and support request (or any other identifying information you may to us) and in accordance with their instructions. Our privacy practices in such cases will be governed by the contract that we have in place with the customer. 	<ul style="list-style-type: none"> • Service Providers • Customer

This chart details the categories of Personal Data that we collect and have collected over the past 12 months through your use of all of our Website. **Helpshift acts as Controller or Business with respect to this data:**

<u>Category of Personal Data</u>	<u>Examples of Personal Data We Collect</u>	<u>Categories of Third Parties With Whom We</u>
---	--	--

		<u>Share this Personal Data:</u>
Profile or Contact Data	<ul style="list-style-type: none"> • First and last name • Email address • Phone number • Mailing address 	<ul style="list-style-type: none"> • Service Providers
Online Identifiers	<ul style="list-style-type: none"> • Unique identifiers such as email IDs 	<ul style="list-style-type: none"> • Service Providers
Device/IP Data	<ul style="list-style-type: none"> • IP address • Device ID • Type of device/operating system/browser used to access the Services 	
Web Analytics	<ul style="list-style-type: none"> • Browsing or search history • Web page interactions (including with ads) • Referring webpage/source through which you accessed the Website • Non-identifiable request IDs • Statistics associated with the interaction between device or browser and the Website 	
Social Network Data	<ul style="list-style-type: none"> • Email • Phone number • User name on the social network • IP address • Device ID 	<ul style="list-style-type: none"> • Service Providers
Other Identifying Information that You Voluntarily Choose to Provide	<ul style="list-style-type: none"> • Identifying information in emails or letters you send us • When you register for or use an account, request a demo, trial or further information about our Services, subscribe to marketing communications, provide your feedback, seek customer support, post comments on our blog, or sign up to our events or webinars, you may provide certain information to us such as your name, email address, contact details, company name, job role, payment related information (e.g. credit card number, physical address, etc.) and the nature of your request or communication • We may also collect personal information from you offline, such as when you attend one of our events, during phone calls with sales representatives or support staff. 	<ul style="list-style-type: none"> • Service Providers

Categories of Sources of Personal Data

We collect Personal Data about you from the following categories of sources:

- **You**
 - When you provide such information directly to us.
 - When you use our interactive tools and Website and/or Services.
 - When you voluntarily provide information in free-form text boxes through the Services or through responses to surveys or questionnaires.
 - When you send us an email or otherwise contact us.
 - When you use the Website and/or Services and such information is collected automatically.

- Through Cookies (defined in the “Tracking Tools and Opt-Out” section below).
- If you download our mobile application or use a location-enabled browser, we may receive information about your location and mobile device, as applicable.
- If you download and install certain applications and software we make available, we may receive and collect information transmitted from your computing device for the purpose of providing you the relevant Website and/or Services.
- **Third Parties**
 - Social Networks
 - If you provide your social network account credentials to us or otherwise sign in to the Services through a third-party site or service, some content and/or information in those accounts may be transmitted into your account with us.

Our Commercial or Business Purposes for Collecting Personal Data

- **Providing, Customizing and Improving the Website and/or Services**
 - Providing you with the products, services or information you request.
 - Meeting or fulfilling the reason you provided the information to us.
 - Providing support and assistance for the Website and/or Services and to process transactions and orders.
 - Set up your online account and send you administrative or account related information
 - Improving the Website and/or Services, including testing, research, internal analytics and product development.
 - Manage your account, customer relationship management, provide support and other related services.
 - Personalizing the Website and/or Services, website content and communications based on your preferences.
 - To obtain your feedback or user experience.
 - Doing fraud protection, security and debugging.
 - To identify trends and address Service issues.
 - To maintain security and identify any server problems or other IT or network issues.
 - For other legitimate business purposes such as audits, for marketing and customer relationships, record keeping, business planning and management.
 - Carrying out other business purposes stated when collecting your Personal Data or as otherwise set forth in applicable data privacy laws, such as the California Consumer Privacy Act (the “CCPA”).
- **Marketing the Services**
 - Where in accordance with your preferences, marketing and selling the Services.
- **Corresponding with You**
 - Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about Helpshift or the Services.
 - Sending emails and other communications according to your preferences or that display content that we think will interest you.
- **Meeting Legal Requirements and Enforcing Legal Terms**

- Fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.
- Protecting the rights, property or safety of you, Helpshift or another party.
- Enforcing any agreements with you.
- Resolving disputes.

We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated or incompatible purposes without providing you notice.

How We Share Your Personal Data

We disclose your Personal Data to the categories of service providers and other parties listed in this section. Depending on state laws that may be applicable to you, some of these disclosures may constitute a “sale” of your Personal Data. For more information, please refer to the state-specific sections below.

- **Service Providers.** These parties help us provide the Website and/or Services or perform business functions on our behalf. They include:
 - Hosting, technology and communication providers.
 - A list of our current third-party and affiliate sub-processors is available at <https://www.helpshift.com/legal/subprocessors>.
- **Customers.** This party contracts with Helpshift to make Helpshift’s customer support technology (our Services) available to you. **Note that we will only share your Personal Data with the specific customer that contracted with Helpshift to make the Services available to you, and not with any of our other customers.**
- **Parties You Authorize, Access or Authenticate**
 - Third parties you access through the services.
 - Other users.

Legal Obligations

We may share any Personal Data that we collect with third parties in conjunction with any of the activities set forth under “Meeting Legal Requirements and Enforcing Legal Terms” in the “Our Commercial or Business Purposes for Collecting Personal Data” section above.

Business Transfers

All of your Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part). Should one of these events occur, we will make reasonable efforts to notify you before your information becomes subject to different privacy and security policies and practices.

Data that is Not Personal Data

We may create aggregated, de-identified or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user. We

may use such aggregated, de-identified or anonymized data and share it with third parties for our lawful business purposes, including to analyze, build and improve the Services and promote our business, provided that we will not share such data in a manner that could identify you.

Tracking Tools, Advertising and Opt-Out

The Website and/or Services use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “Cookies”) to enable our servers to recognize your web browser, tell us how and when you visit and use our Website and/or Services, analyze trends, learn about our user base and operate and improve our Services. Cookies are small pieces of data— usually text files – placed on your computer, tablet, phone or similar device when you use that device to access our Website and/or Services. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s). Please note that because of our use of Cookies, the Website and Services do not support “Do Not Track” requests sent from a browser at this time.

We use the following types of Cookies:

- **Essential Cookies**. Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Website and/or Services. Disabling these Cookies may make certain features and services unavailable.
- **Functional Cookies**. Functional Cookies are used to record your choices and settings regarding our Website and Services, maintain your preferences over time and recognize you when you return to our Website and Services. These Cookies help us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Retargeting/Advertising Cookies**. Retargeting/Advertising Cookies collect data about your online activity and identify your interests so that we can provide advertising that we believe is relevant to you. For more information about this, please see the section below titled “Information about Interest-Based Advertisements.”

You can decide whether or not to accept Cookies through your internet browser’s settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete 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 our Website and some of the Services and functionalities may not work.

To explore what Cookie settings are available to you, look in the “preferences” or “options” section of your browser’s menu. To find out more information about Cookies, including information about how to manage and delete Cookies, please visit <http://www.allaboutcookies.org/> or <https://ico.org.uk/for-the-public/online/cookies/> if you are located in the European Union.

Information about Interest-Based Advertisements:

We may serve advertisements, and also allow third-party ad networks, including third-party ad servers, ad agencies, ad technology vendors and research firms, to serve advertisements through the Website. These advertisements may be targeted to users who fit certain general profile categories or display certain preferences or behaviors (“Interest-Based Ads”). Information for Interest-Based Ads (including

Personal Data) may be provided to us by you, or derived from the usage patterns of particular users on the Website and/or services of third parties. Such information may be gathered through tracking users' activities across time and unaffiliated properties, including when you leave the Website. To accomplish this, we or our service providers may deliver Cookies, including a file (known as a "web beacon") from an ad network to you through the Website. Web beacons allow ad networks to provide anonymized, aggregated auditing, research and reporting for us and for advertisers. Web beacons also enable ad networks to serve targeted advertisements to you when you visit other websites. Web beacons allow ad networks to view, edit or set their own Cookies on your browser, just as if you had requested a web page from their site.

We comply with the Digital Advertising Alliance ("DAA") Self-Regulatory Principles for Online Behavioral Advertising. Through the DAA and Network Advertising Initiative ("NAI"), several media and marketing associations have developed an industry self-regulatory program to give consumers a better understanding of, and greater control over, ads that are customized based on a consumer's online behavior across different websites and properties. To make choices about Interest-Based Ads from participating third parties, including to opt-out of receiving behaviorally targeted advertisements from participating organizations, please visit the DAA's or NAI's consumer opt-out pages, which are located at <http://www.networkadvertising.org/choices/> or www.aboutads.info/choices. Users in the European Union should visit the European Interactive Digital Advertising Alliance's user information website <http://www.youronlinechoices.eu/>.

Data Security and Retention

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures based on the type of Personal Data and how we are processing that data. Although we work to protect the security of your data that we hold in our records, please be aware that no method of transmitting data over the internet or storing data is completely secure.

We retain Personal Data about you for as long as necessary to provide you with our Services. In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. We may further retain information in an anonymous or aggregated form where that information would not identify you personally.

Third party website/services

The Website may permit you to link to other websites on the Internet, and other websites may contain links to the Website. These other websites are not under Helpshift control, and such links do not constitute an endorsement by Helpshift of those other websites or the services offered through them. The privacy and security practices of websites linked to or from the Service are not covered by this Privacy Statement, and Helpshift is not responsible for the privacy or security practices or the content of such websites.

Personal Data of Children

We do not knowingly collect or solicit Personal Data about children under 16 years of age; if you are a child under the age of 16, please do not attempt to register for or otherwise use the Services or send us any Personal Data. If we learn we have collected Personal Data from a child under 16 years of age, we

will delete that information as quickly as possible. If you believe that a child under 16 years of age may have provided Personal Data to us, please contact us at privacy@helpshift.com.

California Resident Rights

If you are a California resident, you have the rights set forth in this section. Please see the “Exercising Your Rights” section below for instructions regarding how to exercise these rights. Please note that we may process Personal Data of our customers’ end users or employees in connection with our provision of certain services to our customers. If we are processing your Personal Data as a service provider, you should contact the entity that collected your Personal Data in the first instance to address your rights with respect to such data.

If there are any conflicts between this section and any other provision of this Privacy Policy and you are a California resident, the portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following rights apply to you, please contact us at privacy@helpshift.com.

Access

You have the right to request certain information about our collection and use of your Personal Data over the past 12 months. In response, we will provide you with the following information:

- The categories of Personal Data that we have collected about you.
- The categories of sources from which that Personal Data was collected.
- The business or commercial purpose for collecting or selling your Personal Data.
- The categories of third parties with whom we have shared your Personal Data.
- The specific pieces of Personal Data that we have collected about you.

If we have disclosed your Personal Data to any third parties for a business purpose over the past 12 months, we will identify the categories of Personal Data shared with each category of third party recipient. If we have sold your Personal Data over the past 12 months, we will identify the categories of Personal Data sold to each category of third party recipient.

Deletion

You have the right to request that we delete the Personal Data that we have collected about you. Under the CCPA, this right is subject to certain exceptions: for example, we may need to retain your Personal Data to provide you with the Services or complete a transaction or other action you have requested. If your deletion request is subject to one of these exceptions, we may deny your deletion request.

Exercising Your Rights

To exercise the rights described above, you or your Authorized Agent (defined below) must send us a request that (1) provides sufficient information to allow us to verify that you are the person about whom we have collected Personal Data (this may include personal identifiers such as name, email IDs, phone numbers or any other information that you may have provided to us) and (2) describes your request in sufficient detail to allow us to understand, evaluate and respond to it. Each request that meets both of these criteria will be considered a “Valid Request.” We may not respond to requests that do not meet these criteria. We will only use Personal Data provided in a Valid Request to verify your identity and complete your request. You do not need an account to submit a Valid Request.

We will work to respond to your Valid Request within 45 days of receipt. We will not charge you a fee for making a Valid Request unless your Valid Request(s) is excessive, repetitive or manifestly unfounded. If we determine that your Valid Request warrants a fee, we will notify you of the fee and explain that decision before completing your request.

You may submit a Valid Request using the following methods:

- Call us at: 1-415-400-4315
- Email us at: privacy@helpshift.com
- [Use the form below](#)

You may also authorize an agent (an “Authorized Agent”) to exercise your rights on your behalf. To do this, you must provide your Authorized Agent with written permission to exercise your rights on your behalf, and we may request a copy of this written permission from your Authorized Agent when they make a request on your behalf.

Personal Data Sales Opt-Out and Opt-In

We will not sell your Personal Data, and have not done so over the last 12 months. To our knowledge, we do not sell the Personal Data of minors under 16 years of age.

We Will Not Discriminate Against You for Exercising Your Rights Under the CCPA

We will not discriminate against you for exercising your rights under the CCPA. We will not deny you our goods or services, charge you different prices or rates, or provide you a lower quality of goods and services if you exercise your rights under the CCPA.

Other State Law Privacy Rights

California Resident Rights

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Data to third parties for such third parties’ direct marketing purposes; in order to submit such a request, please contact us at privacy@helpshift.com.

Nevada Resident Rights

If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Data to third parties who intend to license or sell that Personal Data. You can exercise this right by contacting us at privacy@helpshift.com with the subject line “Nevada Do Not Sell Request” and providing us with your name. Please note that we do not currently sell your Personal Data as sales are defined in Nevada Revised Statutes Chapter 603A.

European Union Data Subject Rights

EU Residents

If you are a resident of the European Union (“EU”), United Kingdom, Lichtenstein, Norway or Iceland, you may have additional rights under the EU General Data Protection Regulation (the “GDPR”) with

respect to your Personal Data, as outlined below. Please note that we may process your Personal Data on behalf of a customer, and we are therefore acting solely as a processor with respect to that Personal Data. If you are an individual whose Personal Data has been collected through the Services (e.g., you have submitted a support request to a company that uses the our customer support technology) then we are acting as a data processor or service provider on behalf of such company, and you should contact that company, the Controller, to address your rights with respect to such data.

For this section, we use the terms “Personal Data” and “processing” as they are defined in the GDPR, but “Personal Data” generally means information that can be used to individually identify a person, and “processing” generally covers actions that can be performed in connection with data such as collection, use, storage and disclosure. Helpshift will be the controller of your Personal Data processed in connection with the Website.

If there are any conflicts between this section and any other provision of this Privacy Policy, the policy or portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following applies to you, please contact us at privacy@helpshift.com.

Personal Data We Collect

The “Categories of Personal Data We Collect” section above details the Personal Data that we collect from you.

Personal Data Use and Processing Grounds

The “Our Commercial or Business Purposes for Collecting Personal Data” section above explains how we use your Personal Data.

We will only process your Personal Data if we have a lawful basis for doing so. Lawful bases for processing include consent, contractual necessity and our “legitimate interests” or the legitimate interest of others, as further described below.

- Contractual Necessity: We process your Personal Data for our customers as a matter of “contractual necessity”, meaning that we need to process the data to provide you with the Services. When we process data due to contractual necessity, failure to provide such Personal Data will result in your inability to use some or all portions of the Services that require such data.
- Legitimate Interest: We may also process your Personal Data when we believe it furthers the legitimate interest of us or third parties, and we may also de-identify or anonymize Personal Data to further our legitimate interests.

Examples of these legitimate interests include:

- Providing, customizing and improving the Services.
- Marketing the Services.
- Corresponding with you.
- Meeting legal requirements and enforcing legal terms.
- Completing corporate transactions.

- **Consent:** In some cases, we process Personal Data based on the consent you expressly grant to us at the time we collect such data. When we process Personal Data based on your consent, it will be expressly indicated to you at the point and time of collection.
- **Other Processing Grounds:** From time to time we may also need to process Personal Data to comply with a legal obligation, if it is necessary to protect the vital interests of you or other data subjects, or if it is necessary for a task carried out in the public interest.

Sharing Personal Data

The “How We Share Your Personal Data” section above details how we share your Personal Data with third parties.

EU Data Subject Rights

You have certain rights with respect to your Personal Data, including those set forth below. For more information about these rights, or to submit a request, please email us at privacy@helpshift.com. Please note that in some circumstances, we may not be able to fully comply with your request, such as if it is frivolous or extremely impractical, if it jeopardizes the rights of others, or if it is not required by law, but in those circumstances, we will still respond to notify you of such a decision. In some cases, we may also need you to provide us with additional information, which may include Personal Data, if necessary to verify your identity and the nature of your request.

- **Access:** You can request more information about the Personal Data we hold about you and request a copy of such Personal Data.
- **Rectification:** If you believe that any Personal Data we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data.
- **Erasure:** You can request that we erase some or all of your Personal Data from our systems.
- **Withdrawal of Consent:** If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the use or disclosure of certain of your Personal Data, if such use or disclosure is necessary to enable you to utilize some or all of our Website and/or Services.
- **Portability:** You can ask for a copy of your Personal Data in a machine-readable format. You can also request that we transmit the data to another controller where technically feasible.
- **Objection:** You can contact us to let us know that you object to the further use or disclosure of your Personal Data for certain purposes, such as for direct marketing purposes.
- **Restriction of Processing:** You can ask us to restrict further processing of your Personal Data.
- **Right to File Complaint:** You have the right to lodge a complaint about Helpshift's practices with respect to your Personal Data with the supervisory authority of your country or EU Member State. A list of Supervisory Authorities is available here: https://edpb.europa.eu/about-edpb/board/members_en.

Transfers of Personal Data

Your Personal Data may be stored and processed by us in any country where we have facilities (e.g. India) or where we engage service providers (e.g. the "U.S."). If you do not reside in the U.S., laws in the U.S. may differ from the laws where you reside. By using the Website and/or Services, you acknowledge that any Personal Data about you, regardless of whether provided by you or obtained from a third party, is being provided to Helpshift in the U.S. and will be hosted on U.S. servers, and you authorize Helpshift to transfer, store and process your information to and in the U.S., and possibly other countries. You hereby consent to the transfer of your data to the U.S. pursuant to : (i) a data processing agreement incorporating standard data protection clauses promulgated by the European Commission, a copy of which can be obtained at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32010D0087>, (ii) binding corporate rules for data protection that align with the GDPR's requirements, or (iii) adherence to an industry- or technology-specific approved code of conduct blessed by the European Commission. EU-U.S. or Swiss-U.S. Privacy Shield Frameworks, respectively, the details of which are further set forth below.

While Privacy Shield is no longer a valid lawful basis on which Helpshift may rely to transfer personal data from the EU to the U.S. pursuant to Regulation (EU) 2016/679 (General Data Protection Regulation or GDPR), Helpshift continues to comply with both the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework, as set forth by the U.S. Department of Commerce regarding the collection, use and retention of Personal Data from EU member countries transferred to the U.S. pursuant to Privacy Shield. We have certified to the Department of Commerce that we adhere to the Privacy Shield Principles that are a part of the Privacy Shield program. If there is any conflict between the policies in this Privacy Policy and data subject rights under the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>.

With respect to Personal Data received or transferred pursuant to the Privacy Shield Frameworks, Helpshift is subject to the regulatory and enforcement powers of the U.S. Federal Trade Commission.

Pursuant to the Privacy Shield Frameworks, EU individuals have the right to obtain our confirmation of whether we maintain Personal Data relating to you in the U.S. Upon request, we will provide you with access to the Personal Data that we hold about you. You may also correct, amend, or delete the Personal Data we hold about you. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data transferred to the U.S. under Privacy Shield, should direct their query to privacy@helpshift.com. If requested to remove data, we will respond within a reasonable timeframe.

We will provide you with the choice to opt-out, or opt-in for sensitive data, before we share your data with third parties other than our agents, or before we use it for a purpose other than the purpose for which it was originally collected or subsequently authorized. To request to limit the use and disclosure of your Personal Data, please submit a written request to privacy@helpshift.com.

In certain situations, we may be required to disclose Personal Data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Helpshift's accountability for Personal Data that it receives in the U.S. under the Privacy Shield and subsequently transfers to a third party is described in the Privacy Shield Principles. In particular, Helpshift remains responsible and liable under the Privacy Shield Principles if third-party agents that it engages to

process Personal Data on its behalf do so in a manner inconsistent with the Privacy Shield Principles, unless Helpshift proves that it is not responsible for the event giving rise to the damage.

In compliance with the Privacy Shield Principles, Helpshift commits to resolve complaints about your privacy and our collection or use of your Personal Data transferred to the U.S. pursuant to Privacy Shield. Please contact us at privacy@helpshift.com with any questions, concerns or complaints relating to our Privacy Shield Certification.

If you have an unresolved Privacy Shield complaint that we have not addressed satisfactorily, we commit to cooperate with the panel established by the EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner, as applicable, and to comply with the advice given by them in respect of the complaint. [Click here](#) for a list of EU DPAs.

You may have the option to select binding arbitration for the resolution of your complaint under certain circumstances. To find out more about the Privacy Shield's binding arbitration scheme please see <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>.

Information we collect as a Data Processor or Service Provider

Please note that, as stated above, if you are an individual whose Personal Data has been collected through the Services (e.g., you have submitted a support request to a company that uses our customer support technology) then we are acting as a data processor or service provider on behalf of such company. You will need to contact the company (our customer) directly to exercise the rights above and they will respond to you accordingly. We will provide assistance to our customers to respond to your requests where required, in accordance with their instructions and the terms of our agreement with them.

Changes to this Privacy Policy

We're constantly trying to improve our Services, so we may need to change this Privacy Policy from time to time, but we will alert you to any such changes by placing a notice on the Helpshift website, by sending you an email and/or by some other means. Please note that if you've opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. Use of information we collect is subject to the Privacy Policy in effect at the time such information is collected.

Contact Information:

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Data or your choices and rights regarding such collection and use, please do not hesitate to contact us at:

- 1-415-400-4315
- www.helpshift.com
- privacy@helpshift.com
- Address: 1 Embarcadero Center | Suite SL12 | No. 2048 | San Francisco, CA 94111

If you are located in the European Union, you may use the following information to contact our European Union-Based Member Representative:

- For UK: Matt Potts (matt.potts@helpshift.com)
- For EU and other regions: privacy@helpshift.com