

AHEAD Privacy Policy

Last Updated: August 12, 2024

AHEAD, Inc. (“**AHEAD**”, “**we**”, “**us**”, or “**our**”) respects your privacy. This Privacy Policy (“**Policy**”) describes the processing of Personal Information (defined below) that is provided, collected, or disclosed in the course of providing our services to you (“**Services**”), including on the websites and other platforms that link to this Privacy Policy (“**Site**”). It also describes rights you may have under applicable data protection laws. To access this Policy in an alternative downloadable format, please [click here](#).

Personal Information We Collect

We may collect a range of Personal Information. “**Personal Information**” means information that uniquely identifies, relates to, describes, or is reasonably capable of being associated with or linked to you. The types of Personal Information we collect may include:

- *Contact Information* – If you submit an inquiry, register for an account, or provide information on or through our Services, we may collect your contact information. This may include your name, address, email address, demographic information, and phone number.
- *Commercial Information* – If you submit an inquiry, or provide information on our Site, we may collect commercial information including information about purchases, subscriptions, and Services you have shown interest in.
- *Usage Information* – When you use our Site, we may automatically record information, including your Internet Protocol address (IP Address), geolocation of your device, browser type, referring URLs (e.g., the website you visited before coming to our Site), domain names associated with your internet service provider, and any other information regarding your interaction with our Site.
- *Employment Information* – If you apply for employment with us, we will collect Personal Information related to your potential employment, including your education and employment history, address and contact information, demographic information, and any other information included in your resume or application.
- *Communication Information* – We may collect Personal Information contained within your communications with us via email, chat functionality, social media, telephone, or otherwise, and in certain cases we may use third-party service providers to do so. Where permitted by applicable law, we may collect and maintain records of calls and chats with our agents, representatives, or employees via message, chat, post, or similar functionality.

How We Collect Personal Information

- *Directly From You* – We collect Personal Information that you provide to us, for example, if you choose to contact us, request information from us, or sign up to receive updates.
- *From Third Parties* – We may collect Personal Information from third parties including business partners, subcontractors, advertising networks, analytics providers, and search information providers, who may provide us with Personal Information about you.

- *Through Online Tracking Technologies* – We use cookies and similar technologies to collect Personal Information related to activity on our Site. For additional information regarding our use of these technologies, see the *Cookies and Tracking Technologies* section below.

How We Use Personal Information

To the extent permitted by applicable law, we use Personal Information:

- *To provide our Site and Services*, including providing customer service, maintaining accounts, verifying customer information, and maintaining our business records.
- *For internal research and development*, such as testing and improving the quality of our Site and Services.
- *For marketing and advertising our Services*, such as sending information about our Services, including using your information to send you messages, notices, newsletters, surveys, promotions, or news about events. We also use Personal Information to conduct interest-based advertising as discussed in the *Cookies and Other Tracking Technologies* section below. You can manage your marketing and other communications preferences by logging into your account on our Site. You also unsubscribe from any marketing emails or text messages that we may send you by clicking the unsubscribe option in the footer of an email or texting “STOP” in response to a text message that you receive from us.
- *For communicating with you*, such as responding to your questions and comments.
- *For legal, security, or safety reasons*, such as protecting our and our users’ safety, property, or rights; complying with legal requirements; enforcing our terms, conditions, and policies; detecting, preventing, and responding to security incidents; and protecting against malicious, deceptive, fraudulent, or illegal activity.
- *As part of a corporate transaction*, such as in connection with the sale of part or all of our assets or business, the acquisition of part or all of another business or another business’ assets, or another corporate transaction, including bankruptcy.

If you are applying for employment with us, we also use Personal Information to process your job application, to verify the information you have provided in your application, conduct interviews, perform background and reference checks, to communicate with you and answer your questions, to confirm your eligibility for employment, and improve our recruiting processes. We may also save your Personal Information for future employment opportunities with us.

How We Disclose Personal Information

We may disclose your Personal Information in the following circumstances:

- *Employees and Affiliates* – We may share Personal Information with our employees and affiliates who have a need to know the information for our business purposes.
- *Service Providers* – We may share Personal Information with service providers that provide services for us. For example, we may share Personal Information with vendors to help us host and manage the Site; provide marketing services; improve the content and functionality of the Site; perform data analysis and statistical analysis; and troubleshoot problems with the Site.

- *Ad Tech Companies and Other Providers* – We may share or make available limited Personal Information such as a mobile device identifiers with ad tech companies and other online service providers. When we share your Personal Information in this context, we follow applicable legal requirements, which may require that we provide opt-out rights or other individual rights.
- *Legal Obligation* – We may disclose Personal Information to a third party when we have a good faith belief that such disclosure of Personal Information is reasonably necessary to (a) satisfy or comply with any requirement of law, regulation, legal process, or enforceable governmental request, (b) enforce or investigate a potential violation of any agreement you have with us, (c) detect, prevent, or otherwise respond to fraud, security or technical concerns, (d) support auditing and compliance functions, or (e) protect the rights, property, or safety of AHEAD, its employees and customers, or the public against harm.
- *Merger or Change of Control* – We may disclose Personal Information to third parties as necessary if we are involved in a merger, acquisition, or any other transaction involving a change of control in our business, including but not limited to, a bankruptcy or similar proceeding. Where legally required, we will give you notice prior to such disclosure.
- *Other* – We may share Personal Information with third parties and/or service providers when explicitly requested by or consented to by you, or for the purposes for which you disclosed the Personal Information to us as indicated at the time and point of the disclosure (or as was obvious at the time and point of disclosure).

Cookies and Other Tracking Technologies

We and our service providers may use cookies and similar technologies to collect usage and browser information about how you use our Site. The technologies we use for this automatic data collection may include cookies and web beacons that permit us to verify system and server integrity and generate statistics around the popularity of certain content. We process the information collected through such technologies, which may include or be combined with Personal Information, to help operate certain features of our Site, to enhance your experience through personalization, and to help us better understand the features of our Site that you and other users are most interested in.

Website Analytics – We use analytics services that use cookies and other technologies that collect your Personal Information, to assist us with analyzing our Site traffic and usage to optimize, maintain, and secure our Site and inform subsequent business decisions (including, for example, advertising). These include, but are not limited to, Google Analytics. To learn more about how Google uses data, visit [Google’s Privacy Policy](#) and Google’s page on [“How Google uses data from sites or apps that use our services.”](#) You may download the [Google Analytics Opt-out Browser Add-on](#) for each web browser you use, but this does not prevent the use of other analytics tools. To learn more about Google Analytics cookies, visit [Google Analytics Cookie Usage on Websites](#).

Interest-Based Advertising – Interest-based advertising occurs when advertisements are shown to you based on information collected from your online interactions over time and across multiple websites that you visit, or across multiple devices or online services that you may use. Companies that engage in interest-based advertising use this information to predict your preferences and show you advertisements that are most likely to be of interest or relevant to you. Some of the content, applications, and tracking technologies on our Site is controlled by third parties, which include ad tech companies (such Google) or other online service providers that serve interest-based advertisements. These third parties may use cookies, web beacons, and other similar technologies to collect or receive information from our Site and other websites and use that information to provide measurement services as engage in interest-based advertising. We do not control

these third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. For example, you can block the collection and use of your information by online platforms and ad tech companies for the purpose of serving interest-based advertising by visiting the opt out pages of the self-regulatory programs of which those companies are members: [National Advertising Initiative](#) and [Digital Advertising Alliance](#). Please note that even if you opt out of interest-based advertising, you may still see “contextual” ads which are based on the context of what you are looking at on the websites and pages you visit.

Selling or Sharing Personal Information – While we do not sell Personal Information in exchange for monetary consideration, we do share Personal Information for other benefits that could be deemed a “sale” or “sharing” under various data protection laws, because they are sometimes broadly defined to include activities such as the delivery of interest-based advertising on websites or allowing third parties to receive certain information, such as cookies, IP address, and/or browsing behavior. We similarly engage in interest-based advertising when we use data about your activities on our Site to serve you ads on websites owned or controlled by third parties. It is in this context that we have provided advertising networks, data analytics providers, social networks, and video sharing platforms with Personal Information such as your IP address, device information, Internet and other electronic network activity information, and geolocation information in the last twelve months.

Cookie Choices – In order to manage your preferences with respect to these technologies, please visit our preferences page. In addition, you can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable certain cookies, please note that some parts of our Site may not function properly. Please note that if you have opted-out of “sales” or set other preferences, then those opt-outs or preferences may be lost if you delete your cookies.

How Long We Keep Your Personal Information

We will retain your Personal Information for as long as necessary to fulfill the purposes described in this Privacy Policy, unless otherwise required by applicable laws. Criteria we will use to determine how long we will retain your Personal Information include whether we need your Personal Information to provide you with our Services; we continue to have a relationship with you; you have requested information from us; we have a legal right or obligation to continue to retain your Personal Information; we have an obligation to a third party that involves your Personal Information; our retention or recordkeeping policies and obligations dictate that we retain your Personal Information; we have an interest in providing you with information about our Services; or we have another business purpose for retaining your Personal Information.

How We Protect Personal Information

We use commercially reasonable efforts to protect the confidentiality and security of Personal Information. However, despite these efforts to store Personal Information in a secure environment, we cannot guarantee the security of Personal Information during its transmission or its storage on our systems.

International Use of Our Site

Our Site is hosted in the United States. If you are visiting our Site from outside of the United States, please note that by providing your Personal Information, it is being transferred to, stored, collected, or processed in the United States, where our servers are located and operated.

Children’s Privacy

We do not knowingly collect or solicit any Personal Information from children under the age of 13 without verified written parental consent. In the event that we learn that we have collected Personal Information from a child under the age of 13, we will promptly take steps to delete that information. If you are a parent or legal guardian and think your child has given us their Personal Information, you can email us at privacy@ahead.com.

Links to Third-Party Websites

We are not responsible for the practices employed by any websites or services linked to or from our Site, including the information or content contained within them. We encourage you to investigate and ask questions before disclosing Personal Information to third parties, since any Personal Information disclosed will be handled in accordance with the applicable third party’s privacy notice.

De-Identified or Aggregated Information

AHEAD may collect, use, share, transfer and otherwise process de-identified and aggregated information that it receives or creates for any purposes in its sole discretion, in compliance with applicable laws. AHEAD is the sole and exclusive owner of such de-identified and aggregated information, including if AHEAD de-identifies Personal Information so that it is no longer considered Personal Information under applicable laws.

California Residents

This section applies to our collection and use of Personal Information if you are a resident of California, as required by the California Consumer Privacy Act of 2018 and its implementing regulations, as amended by the California Privacy Rights Act (“CCPA”), where “**Personal Information**” has the definition set forth in the CCPA.

AHEAD makes the following disclosures regarding the Personal Information it has collected within the 12-month period preceding the date this Policy was last updated:

Sources of Personal Information – We collect Personal Information from the categories of sources detailed in the *How We Collect Personal Information* section above.

Use of Personal Information – We collect Personal Information for the business and commercial purposes detailed in the *How We Use Personal Information* section above.

Disclosure of Personal Information – The categories of third parties to whom we disclose Personal Information for a business or commercial purpose are detailed in the *How We Disclose Personal Information* section above. The categories of third parties to whom we sell or share Personal Information are summarized in the chart below. We do not knowingly sell or share the Personal Information of minors under the age of 16.

| Category of Personal Information We Collect | Categories of Third Parties to Whom We Sell or Share Personal Information |
|---|--|
| Identifiers | Third-party marketers, analytics providers and other third parties that set cookies and other online tracking technologies on our Site |
| Personal information, as defined in the California customer records law | We do not sell or share this category of Personal Information |
| Commercial Information | We do not sell or share this category of Personal Information |
| Internet or other similar network activity | Third-party marketers, analytics providers and other third parties that set cookies and other online tracking technologies on our Site |
| Professional or employment-related information | We do not sell or share this category of Personal Information |

California Shine the Light – Under California Civil Code Section 1798.83, individual customers who reside in California and who have an existing business relationship with us may request information about our disclosure of certain categories of Personal Information to third parties for the third parties’ direct marketing purposes, if any. To make such a request, please contact us at privacy@ahead.com. Please be aware that not all information sharing is covered by these California privacy rights requirements and only information on covered sharing will be included in our response. This request may be made no more than once per calendar year.

Notice to Individuals in the European Union, European Economic Area, Switzerland, and United Kingdom

This section provides additional information regarding AHEAD’s processing of Personal Information of people located in the European Union (“EU”), European Economic Area (“EEA”), Switzerland, and the United Kingdom (“UK”) in accordance with the EU Data Protection Regulation, UK Data Protection Regulation, and the Swiss Federal Data Protection Act.

Legal Basis for Processing – Our legal basis for processing Personal Information depends on the Personal Information concerned and the context in which we process it. We process Personal Information from you where we need it to perform a contract with you, where the processing is in our legitimate interests (including the purposes described in this Policy), where the processing is necessary for us to meet our applicable legal obligations, or if we otherwise have your consent.

Special Category Data – AHEAD does not intend to collect any Special Category Data, which is any data that reveals your racial or ethnic origin, political opinions, religious, moral or philosophical beliefs, trade union membership, political views, the processing of genetic data, biometric data for the purpose of identifying a person, and data concerning health or a person’s sex life and/or sexual orientation. Please refrain from sending us any Special Category Data.

Automated Decision Making – AHEAD does not make any automated decisions on your behalf or about you. If we decide to do so, we will obtain your express, opt-in consent. In the event we secure your consent to do so, you have the right to object to the processing of Personal Information via automated decision making at any time by contacting us at privacy@ahead.com.

Transfers to Third Parties and Countries – Personal Information that we collect or receive may be transferred to and/or processed by third parties that are located outside of the EU, EEA, Switzerland or the UK, some of which applicable authorities may not consider to have an adequate level of protection for Personal Information. AHEAD will only transfer Personal Information to third parties located outside of the EU, EEA, Switzerland, and the UK when it has ensured appropriate safeguards for such Personal Information through use of the standard contractual clauses or other lawful and approved methods.

Your Privacy Rights and How To Exercise Them

Depending on where you live, you may have the following additional rights with respect to your Personal Information under applicable data protection laws:

- *Access* – The right to request access to and obtain a copy of any Personal Information we may have about you.
- *Deletion* – The right to delete your Personal Information that we have collected or obtained, subject to certain exceptions.
- *Correction* – The right to request that we correct any inaccuracies in your Personal Information, subject to certain exceptions.
- *Opt Out* – The right to: (a) opt out of the processing of your Personal Information for purposes of targeted advertising, (b) opt out of the sale or sharing of your Personal Information; (c) limit the use of your Sensitive Personal Information (if applicable), and (c) opt out of profiling in furtherance of decisions that produce legal or similarly significant effects. We do not collect Personal Information that is considered sensitive, so we do not offer the right to limit its use. We also do not profile you or other individuals in a manner that would result in legal or similarly significant effects, so we do not offer an opt out.
- *Objection/Restriction of Processing* – The right to object or restrict us from processing your Personal Information in certain circumstances.
- *Withdraw Consent* – The right to withdraw your consent where we are relying on your consent to process your Personal Information.
- *Lodge a Complaint* – The right to lodge a complaint with a supervisory authority or other regulatory agency if you believe we have violated any of the rights afforded to you under applicable data protection laws. We encourage you to first reach out to us so we have an opportunity to address your concerns directly before you do so.

To exercise any of the privacy rights afforded to you under applicable data protection laws, please submit a request to us by calling us emailing us at privacy@ahead.com or submitting a request on our web form located [here](#). You may also opt out of interest-based (or targeted) advertising by broadcasting an Opt-Out Preference Signal, such as the Global Privacy Control (GPC). We honor Opt-Out Preference Signals,

including GPC. If you choose to use an Opt-Out Preference Signal, you will need to turn it on for each supported browser or browser extension you use.

You will not be discriminated against in any way by virtue of your exercise of the rights listed in this Policy which means we will not deny our Services to you, provide different prices or rates for our Services, or provide a different level or quality of Services to you. Only you, or an authorized agent that you authorize to act on your behalf, may make a request related to your Personal Information.

We must verify your identity before fulfilling your requests, and if we cannot verify your identity, we may request additional information from you. If you are an authorized agent making a request on behalf of another person, we will also need to verify your identity, which may require proof of your written authorization or evidence of a power of attorney. We endeavor to respond to requests within the time period required by applicable law. If we require more time, we will inform you of the reason and extension period in writing.

We do not charge a fee to process or respond to your requests unless they are excessive or repetitive. If we determine that a request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request. We may deny certain requests, or only fulfill some in part, as permitted or required by law. If you are not satisfied with the resolution of your request and you are afforded a right to appeal such decision, you will be notified of our appeal process in our response to your request.

Changes to this Policy

Please note that we may modify or update this Policy from time to time, so please review it periodically. We will provide you notice if material changes are made. Unless otherwise indicated, any changes to this Policy will apply immediately upon posting to our Site.

Contact Us

If you have any questions about our practices or this Policy, please contact us at privacy@ahead.com.