

## **Pepr AI's Privacy Policy**

*updated: Mar 2025*

This Privacy Policy outlines how we as the data controller collect, use and share personal data of people who use or are connected to our services, are interested in our services (or us), or with whom we otherwise do (or would like to do) business. This Privacy Policy also provides you with information on your rights as a data subject and how to reach us if you have any questions.

Pepr AI ("Epoq, Inc.", "we" or "us") are committed to respect the right to privacy, and to comply with applicable data protection laws, such as the GDPR (EU's General Data Protection Regulation), the UK GDPR (the United Kingdom General Data Protection Regulation), and the CCPA (California Consumer Privacy Act). This Privacy Policy outlines how we as the data controller collect, use and share personal data of people who use or are connected to our services, are interested in our services (or us), or with whom we otherwise do (or would like to do) business. This Privacy Policy provides you with information on your rights as a data subject and how to reach us if you have any questions.

Please note that we do not control any personal data processing conducted by online advertising platforms, third party services possibly linked to our services, or by our customers. We have added a few helpful links below, but you should always contact those third parties directly for accurate information on their processing.

- [Facebook & Instagram Data Policy](#)
- [Snapchat Privacy Policy](#)
- [Google Privacy Policy](#)
- [Pinterest Privacy Policy](#)
- [TikTok Privacy Policy](#)

## **Pepr AI's Applications and other Services**

Our Software-as-a-Service (SaaS) applications help to automate and optimize ad campaigns and ad creatives in online advertising platforms such as Facebook, Instagram, Snapchat, Pinterest, TikTok and Google. We also provide advertising related professional services and creative services. If you use or otherwise are involved in the

delivery of our services (e.g. provide creative briefs), we collect the following personal data directly from you or the customer you represent:

- Basic information (such as name, title, work location and contact information)
- Communications (regardless if via email, telephone, chat, video-calls or by other means), traffic data and other related data
- Service data (such as support requests, project plans, service history and service related metrics)

The personal data is used to provide the services, including to communicate with you and provide service support. We also use such data to conduct surveys, to process feedback and to develop and improve our services. The personal data is erased from or anonymized in our systems upon request of the data subject or the customer they represent, or if the data is detected as irrelevant in our automated or manual system maintenance, or after three years of our latest contact to the data subject, whichever occurs first.

If you are a user of our platform services, we also process:

- Login details and general user information, including user name, email address, password (hashed)
- IP address and browser user agent (when using the Pepr AI application)
- User's id in customer's identity provider (when using SSO/SCIM)
- Log data and other data derived from your actions in our services

This personal data is used to authenticate users to allow access to Pepr AI's application(s), identify users when providing customer support, and store events and log information regarding a customer's use of the Pepr AI's application(s) for purposes of audit in case of a security or other incident to have a trail of actions performed by us and our users, to maintain support records, and for purposes of services improvement and service level analysis. The data is removed upon request, except for data (such as user name) stored in application logs and audit trails, which are deleted according to our standard data management cycle.

After a user has connected or otherwise authorized our platform to access their ad account or assets on certain online advertising platform(s), we process (where granted with access and to the extent applicable to the services in question):

- The user identification information, such as user ID, user name, user email and profile picture URL
- Access tokens (more information is available about access rights in the applicable online platform's community sites, for example regarding Facebook access tokens [here](#))
- Advertiser identification information, such as Ad account ID and Advertiser ID
- Events and log information on interaction between the ad account and Pepr AI's application(s)

Such personal data is used to identify each user and verify their access rights, permit users to access and use the service (i.e. to identify and connect the assets and campaigns and manage these assets and campaigns on online advertising platform via Pepr AI's platform, to synchronize campaign entities and metrics between our services and online advertising platform), and to provide support service. We will process such ad account and campaign related personal data until our access to such data is revoked (including invalidated by using an online advertising platform's tools.)

All processing under this section is based on our legitimate interests in maintaining, evaluating and improving our services, including to provide customers with agreed services, ensuring security and availability of the services, to help us understand how our services are used and how campaigns perform, for resource management, and to gain insights which help us dedicate our resources and efforts better.

The personal data may be shared, as necessary to perform the services as agreed, to other users and the online advertising platform partners, as well as our suppliers participating in service production, development and quality control.

To the extent needed to produce the services, including to allocate our support resources, your data are transferred within the United States. All servers and data processing infrastructure are located within the United States.

Please note that online advertising platforms and our customers (your employer) may also transfer and share the same data as data controllers in accordance with their respective privacy policies.

## **Website and Contact Requests**

Our websites deploy cookies, which are necessary for the sites to function (e.g. to enable page navigation, access to secure areas of the site, filling in forms, and setting

your privacy preferences), and, subject to your consent, also uses other cookies for: content personalization, marketing, provision of media features and analysis of site traffic. Please see our cookie policy for detailed description of the used cookies, their purposes and to learn how to revoke “cookie-consents” and otherwise manage your preferences.

If you decide to contact us through our website (or any other channels, we’re always happy to hear from you), we will use the contact details and other given information to reply and process your request, for example to contact you to provide more information and to arrange a demo if you wish to learn more about our services. The processing is based on its necessity to reply to you and take measures deemed by your request.

Personal data derived from the websites and contract requests are deleted upon request of the contact, if the data is recognized out-dated, if the contact is no longer deemed suitable candidate to our service or has been inactive for over a year.

Such data is not regularly shared or transferred outside the US.

Please note that our services and resources are designed for business customers only (and should not even be interesting to consumers), and thus we presume that everyone contacting us and interested in our services represent a business, not a private individual.

## **Contracting and Invoicing**

If you serve as the representative or other contact of our customer, supplier, partner or other entity we do (or wish to do) business with we’ll need to process the following information:

- Basic information (such as name, title, company name, work location and contact information)
- Business connections
- Communications

You are the main source of information, but the personal data may also be collected from your employees, your colleagues, and our (other) customers, suppliers and partners.

The personal data is used to discuss business opportunities, send notifications related to our services and otherwise communicate with you, contracting, invoicing and making

payments. The processing is based on our legitimate interests pertaining to agreements we have (or have had), maintaining relationships, and pursuing our business. In addition, the invoicing related personal data will be used in accounting and reporting, which processing shall be based on our obligations under the law.

The personal data are erased from or anonymized in our systems upon request of the data subject or the party they represent, or if the data is detected irrelevant in our automated or manual system maintenance, or after three years of our latest contact to the data subject, whichever occurs first, with exception of personal data that must be retained for period required in the law, in which case the data shall be retained as long as needed to comply with such requirement.

### **Data Subjects' Rights**

If we store or use your data for purposes described above, you can always request from us:

- To access your personal data
- Rectification or erasure of your data
- For restriction of processing your data, including object such processing
- To receive a copy of data about yourself that you've shared with us and have that data to be transmitted to another data controller

Where the processing is based on consent, you can withdraw such consent at any time. Please note that the withdrawal will not affect processing performed prior to the withdrawal.

If you wish to exercise your rights, please see our Contact Information at the very end of this Privacy Policy.

If you are a California resident, you have specific rights under the CCPA, including the right to know what personal information we collect, use, and disclose, the right to request deletion of your personal information, and the right to opt-out of the sale of your personal information (if applicable). We do not currently "sell" personal information as defined under the CCPA.

If you believe your rights under the data protection laws are being infringed, you may lodge a complaint with the relevant regulatory authority in your state or jurisdiction.

We will not discriminate against you for exercising any of your rights under the CCPA, unless permitted by the CCPA. Specifically, we will not:

- Deny you access to our goods or services as a result of your exercise of your rights
- Charge you different prices or rates for such access as a result of your exercise of your rights
- Provide you a different level or quality for such goods or services as a result of your exercise of your rights
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services as a result of your exercise of your rights

### **Data Security**

We are committed to securing your personal data against any unauthorized access, use, disclosure, modification or destruction. We maintain technical and organizational controls designed to ensure a high standard of security for your personal data.

### **Changes to the Privacy Policy**

We may make changes to this Privacy Policy at any time. If changes to Privacy Policy are due to material changes in the processing or further processing, we shall provide the data subjects with necessary information. If you object to any of the changes to this Privacy Policy, you should cease using our services, where applicable.

### **Contact Information**

Data controller: Pepr AI.

You can reach us in all inquiries related to personal data processing at [privacy@pepr.ai](mailto:privacy@pepr.ai).