Sift Supplemental U.S. State Law Privacy Notice

Sift Science, Inc. ("**Sift**", "**we**" or "**us**") respects your privacy and wants you to be informed about what we do. This Supplemental U.S. State Law Privacy Notice (this "**Notice**") applies to residents of California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, and Virginia and explains how we Process Personal Information about you and how you can exercise your privacy rights under your state's privacy law, when such law is effective.

1. **Definitions.** For the purposes of this Notice:
    1. "**State Privacy Laws**" means, collectively, all U.S. state privacy laws and their implementing regulations, as amended or superseded from time to time, that apply generally to the processing of individuals' Personal Information and that do not apply solely to specific industry sectors (e.g., financial institutions), specific demographics (e.g., children), or specific classes of information (e.g., health or biometric information). State Privacy Laws include the following:

        California Consumer Privacy Act of 2018 as amended by the California Privacy Rights Act of 2020 (California Civil Code §§ 1798.100 to 1798.199) ("**CCPA**");

        Colorado Privacy Act (Colorado Rev. Stat. §§ 6-1-1301 to 6-1-1313) ("**ColoPA**");

        Connecticut Personal Data Privacy and Online Monitoring Act (Public Act No. 22-15) ("**CPOMA**");

        Delaware Personal Data Privacy Act (Del. Code tit. 6 §§ 12D-101 to 12D-111) ("**DPDPA**");

        Florida Digital Bill of Rights (Fla. Stat.§§ 501.701 to 501.722) ("**FDBR**");

        Indiana Consumer Data Protection Act (In.Code, Title 24, Art.15 §§24-15) ("**INCDPA**");

        Iowa Consumer Data Protection Act (Iowa Code Ann. §§ 715D.1 to 715D.9) ("**ICDPA**");

        Kentucky Consumer Data Protection Act (Ky. Rev. Statutes §§ 367.3611 to 367.3629) ("**KCDPA**");

        Maryland Online Data Privacy Act (Md.Code, Com.§14-4601) ("**MODPA**");

        Minnesota Consumer Data Privacy Act (Minn.Stat.§325M.10) ("**MICDPA**");

        Montana Consumer Data Privacy Act (Mont. Code Ann. §§ 30-14-2801 to 30-14-2817) ("**MTCDPA**");

        Nebraska Data Privacy Act (L.B.1074) ("**NDPA**");

        New Hampshire Privacy Act (RSA 507-H) ("**NHPA**");

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New Jersey Privacy Act (N.J. Rev. Stat. § 56:8-166.4 et seq.) (“**NJPA**”);

Oregon Consumer Privacy Act (S.B. 619, 82nd Leg. Assemb., Reg. Sess. (Or. 2023)) (“**OCPA**”);

Rhode Island Data Transparency and Privacy Protection Act (RI. Gen. Laws § 6-48.1-1) (“**RIDTPPA**”);

Tennessee Information Privacy Act (Tenn. Code Ann. §§ 47-18-3201 to 47-18-3213) (“**TIPA**”);

Texas Data Privacy and Security Act (Tex. Bus. & Com. Code §§ 541.001 to 541.205) ("**TDPSA**”);

Utah Consumer Privacy Act (Utah Code Ann. §§ 13-61-101 to 13-61-404) (“**UCPA**”); and

Virginia Consumer Data Protection Act (Virginia Code Ann. §§ 59.1-575 to 59.1-585) (“**VCDPA**”).

2. “**Personal Information**” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with an identified or identifiable natural person. Where applicable, Personal Information shall be interpreted consistent with the same or similar term under State Privacy Laws.
3. “**Share**,” “**Shared**,” and “**Sharing**” have the meaning defined in the CCPA.
4. “**Sale**” and “**Selling**” have the meaning defined in the State Privacy Laws.
5. “**Controller**” means “**Controller**” or “**Business**” as those terms are defined in the State Privacy Laws.
6. “**Processor**” means “**Processor**,” “**Service Provider**,” or “**Contractor**” as those terms are defined in the State Privacy Laws.
7. “**Consumer**” has the meaning defined in the State Privacy Laws; consumer also includes “customer” as such term is defined under the RIDTPPA.
8. “**Processing**,” “**Process**,” and “**Processed**” have the meaning defined in the State Privacy Laws.
9. **“Cross-Context Behavioral Advertising**” has the meaning given in the CCPA (targeting advertising to a consumer based on their personal information obtained from activity across businesses, websites or services other than the one with which the consumer intentionally interacts). “**Targeted Advertising**” has the meaning given in the State Privacy Laws (displaying advertisements based on personal information obtained from a consumer’s activity over time and across non-affiliated websites or applications).
10. In the event of a conflict in the meanings of defined terms in the State Privacy Laws, the meaning from the law applicable to the state of residence of the relevant Consumer applies.

2. Applicability

This Notice applies to Personal Information that Sift Processes in its capacity as a Controller, including Personal Information Sift collects through its website as described in the Website Privacy Notice, and information Sift

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collects about its customers' authorized end users (where applicable State Privacy Laws recognize them as Consumers) using its services under its Customers' (your employer's) account as described in the Service Privacy Notice. For clarity, Personal Information Processed by Sift when you interact with any of the Customer Sites that use Sift Services and Personal Information that Sift otherwise processes on behalf of our Customers for fraud/abuse detection and prevention and/or other related purposes as a Service Provider or Processor is covered by the Service Privacy Notice, not this Notice.

3. Sources of Personal Information We Collect and Process

We collect Personal Information from you when you provide it to us or automatically when you use our website or services. We may also obtain information about you from other sources, such as public databases, joint marketing partners, data providers, or social media platforms.

4. Categories of Personal Information We Collect and Process

We collect and process the following categories of Personal Information about you:

- *Identifiers* – such as contact details including your IP address, online identifier, name, address, telephone number, social media profiles, or email address;
- *Commercial Information* – such as records of your purchase history or tendencies;
- *Professional or Employment-Related Data* – such as your company name, job title, company address, LinkedIn URLs;
- *Internet or Other Network Activity Information* – such as your device's device type, browser type, broad geographic location (e.g. country or city-level location), referring website, what pages your device visited, the time that your device visited our website, and content you post on our website or to our services;
- *Inference data* – such as intent data (or user behavior data) and custom profiles; and
- *Other data you choose to provide* – such as any other information you choose to provide to us when completing any 'free text' boxes in our forms (for example, for event sign-up or bot interaction) and opting into and out of marketing communications

Over the past 12 months, we have collected and processed each of the categories of Personal Information as described above.

5. Purposes For Which We Collect and Process Personal Information

We use the Personal Information we collect about you (alone or in combination with other information we have collected about you):

Categories of Personal Information We Collect and Process	Processing Purpose
Identifiers	● To enable you to register an account with us, subscribe to marketing

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	communications (like our newsletters), access a demo or white paper, or enable us to contact you. ● To respond to your requests or provide information you've requested to perform our contract with you. ● To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical, and survey purposes in reliance on our legitimate interests. ● To provide relevant marketing, offers, and services, including for the purposes of targeted advertising on and off our website based on your browsing activities on the website, delivering more relevant email content, event promotion, and using profiling, artificial intelligence or machine learning technologies to promote the Sift services. ● For security reasons, to register visitors to our offices and to manage non-disclosure agreements that visitors may be required to sign, to protect our offices and our confidential information against unauthorized access. ● To send administrative or account related information to you. ● To comply with and enforce applicable legal requirements, agreements, and policies. ● To validate your identity when seeking to exercise your privacy rights. ● To send you marketing and promotional materials (for example, newsletters, telemarketing calls, or SMS or push notifications), if this is in accordance with your marketing preferences. ● For other business purposes - such as, data analysis, identifying usage trends, determining the effectiveness and optimization of our marketing and to enhance, customize, and improve our websites, products and services.
Commercial Information	● To respond to your requests or provide information you've requested to perform our contract with you. ● To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical, and survey purposes in reliance on our legitimate interests. ● To provide relevant marketing, offers, and services, including for the purposes of targeted advertising on and off our website based on your browsing activities on the website, delivering more relevant email content, event promotion, using profiling, artificial intelligence or machine learning technologies to promote the Sift services. ● As part of our efforts to keep our website safe and secure. ● To send administrative or account related information to you. ● To comply with and enforce applicable legal requirements, agreements, and policies. ● For other business purposes - such as, data analysis, identifying usage

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	trends, determining the effectiveness of our marketing and to enhance, customize, and improve our websites, products and services.
Professional or Employment-Related Data	• To enable you to register an account with us, subscribe to marketing communications (like our newsletters), access a demo or white paper, or enable us to contact you. • To respond to your requests or provide information you've requested to perform our contract with you. • To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical, and survey purposes in reliance on our legitimate interests. • To provide or send you with marketing and promotional materials, offers and services (for example, newsletters, telemarketing calls, emails, or SMS or push notifications), including for the purposes of target advertising on and off our website based on your browsing activities on the website, event promotion and using profiling, artificial intelligence or machine learning technologies to promote the Sift services. • For security reasons, to register visitors to our offices and to manage non-disclosure agreements that visitors may be required to sign, to protect our offices and our confidential information against unauthorized access. • To send administrative or account related information to you. • To comply with and enforce applicable legal requirements, agreements, and policies. • To validate your identity when seeking to exercise your privacy rights. • For other business purposes - such as, data analysis, identifying usage trends, determining the effectiveness and optimization of our marketing and to enhance, customize, and improve our websites, products and services. This may include the use of profiling, artificial intelligence or machine learning technologies.
Internet or Other Network Activity Information	• To enable you to register an account with us, subscribe to marketing communications (like our newsletters), access a demo or white paper, or enable us to contact you. • To respond to your requests or provide information you've requested to perform our contract with you. • To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical, and survey purposes in reliance on our legitimate interests. • For security reasons, to register visitors to our offices and to manage non-disclosure agreements that visitors may be required to sign, to protect our offices and our confidential information against unauthorized

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	access. ● To send administrative or account related information to you. ● To comply with and enforce applicable legal requirements, agreements, and policies. ● To validate your identity when seeking to exercise your privacy rights. ● To send you marketing and promotional materials (for example, newsletters, telemarketing calls, or SMS or push notifications), if this is in accordance with your marketing preferences. ● To provide relevant marketing, offers, and services, including for the purposes of targeted advertising on and off our website based on your browsing activities on the website, delivering more relevant email content, event promotion, and using profiling, artificial intelligence or machine learning technologies to promote the Sift services. ● For other business purposes - such as, data analysis, identifying usage trends, determining the effectiveness of our marketing and to enhance, customize, and improve our websites, products and services.
Inference Data	● To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical, and survey purposes in reliance on our legitimate interests; ● To understand how our website is used and to improve our website to ensure that content is presented in the most effective manner for you and your computer in reliance on our legitimate interests. ● To provide relevant marketing, offers, and services, including for the purposes of targeted advertising on and off our website based on your browsing activities on the website, delivering more relevant email content, event promotion, and using profiling, artificial intelligence or machine learning technologies to promote the Sift services. ● For other business purposes - such as, data analysis, identifying usage trends, determining the effectiveness and optimization of our marketing and to enhance, customize, and improve our websites, products and services.
Other Data You Choose to Provide	● To enable you to register an account with us, subscribe to marketing communications (like our newsletters), access a demo or white paper, or enable us to contact you. ● To respond to your requests or provide information you've requested to perform our contract with you. ● To enable you to opt into and/or out of receiving marketing communications from Sift.

6. Disclosing Your Personal Information for Business and Commercial Purposes

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We disclose your Personal Information to the following categories of third parties and service providers for the business and commercial purposes described below:

Vendors, consultants and other service providers. We may disclose your information to third party vendors, consultants and other service providers who provide data Processing services to us and with whom the sharing of such information is necessary to undertake that work. Examples of these types of service providers include: processing billing, providing customer support, hosting our infrastructure, data enrichment, identity verification, or online and offline marketing optimizations, including the use of profiling, artificial intelligence or machine learning technologies. In addition, we may offer you the ability to use third party vendor integrations through our Services. If you choose to use these third party vendor integrations, then you are directly interacting with that third party vendor and providing or directing us to provide information, including Personal Information, to them for purposes of facilitating the integration.

Professional advisors. We may disclose your Personal Information to professional advisors, such as lawyers, bankers, auditors, and insurers, where necessary in the course of the professional services they render to us.

Advertising Partners. We disclose your information to third party advertising partners to show you ads for our services and to report on the effectiveness of ad campaigns.

Corporate affiliates. We may provide your information to our affiliates (meaning any subsidiary, parent company or company under common control with Sift). Our affiliates will use your information only for the purposes described in this Notice.

Parties to a corporate merger or transaction. If Sift is involved in a merger, acquisition or sale of all or a portion of its assets, or it seeks investment in or financing of its business, your information may be disclosed or transferred to potential transaction or financing partners, as permitted by law.

In the preceding 12 months, we disclosed all of the categories of Personal Information listed in Section 4 of this Notice to service providers or contractors for business purposes listed in Section 5 of this Notice.

Sift does not collect Sensitive Personal Information in its capacity as a Controller and therefore does not disclose Sensitive Personal information for purposes other than those permitted by the CCPA.

Over the past 12 months, Sift has disclosed Identifiers, Internet or other similar network activity information, and Commercial Information that we collect from our website (https://www.sift.com and any sub-domains except the Sift console at console.sift.com) to advertising partners to show you ads for our services, report on, and improve the effectiveness of our ad campaigns.

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In the preceding 12 months, Sift sold or shared the following categories of Personal Information to advertising partners for the purposes of Cross-Context Behavioral Advertising and Targeted Advertising: Identifiers; Internet or Other Network Activity Information; and Commercial Information. We do this to show you ads for our services and to measure and improve our campaigns. Sift does not sell or share Sensitive Personal Information. Other than as described here, we do not sell or share your Personal Information.Sift does not have actual knowledge that it sells Personal Information or shares for cross-context behavioral advertising the Personal Information of consumers under 18 years of age. Sift also does not have actual knowledge that it collects or processes the Personal Information of consumers under 13 years of age.

7. Other Disclosures of Your Personal Information

We may also disclose your Personal Information to third parties on other lawful grounds, including to any competent law enforcement body, regulator, government agency court, or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person (see below).

8. Data Retention

We retain your Personal Information where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax, or accounting requirements) and for a period of time consistent with the original purpose as described in this Notice. We determine the appropriate retention period for Personal Information on the basis of the amount, nature, and sensitivity of your Personal Information Processed, the potential risk of harm from unauthorized use or disclosure of your Personal Information and whether we can achieve the purposes of the Processing through other means, as well as on the basis of applicable legal requirements (such as applicable statutes of limitation).

After expiration of the applicable retention periods, we will either delete or anonymize your Personal Information or, if this is not possible (for example, because your Personal Information has been stored in backup archives), then we will securely store your Personal Information and isolate it from any further Processing until deletion is possible.

9. Your Rights

Depending on your location and subject to applicable law, you may have the following rights with regard to Personal Information we control about you:

- The right to know what Personal Information, if any, we have collected about you, including the categories of Personal Information, the categories of sources from which the Personal Information is collected, the business or commercial purpose for collecting, Selling, or Sharing Personal Information, the categories of third parties to whom we disclose, Sell, or Share Personal Information and the specific pieces of Personal Information we have collected about you. Please note that you have the right in California to access Personal Information processed by Sift if it is processed for longer than 12 months
- The right to delete Personal Information provided by or obtained by you, subject to certain exceptions.

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- The right to correct inaccurate Personal Information that we maintain about you.
- The right to opt-out of the Processing of your Personal Information for targeted advertising, the Sale of your Personal Information or the Sharing of your Personal Information for cross-context behavioral advertising.
- The right to opt-out of Profiling in furtherance of producing legal or significant decisions concerning a consumer. We do not engage in such Profiling.
- The right not to be retaliated against for exercising your privacy rights under the State Privacy Laws, including when you are an applicant to a job application, an employee, or an independent contractor.
- If your Personal Information is profiled in furtherance of decisions that produce legal or similarly significant effects concerning you, you have the right to question the result of the profiling, to be informed of the reason that the profiling resulted in the decision, and, if feasible, to be informed of the actions you might have taken to secure a different decision and the actions that you might take to secure a different decision in the future. You also have the right to review your Personal Information used in the profiling, and if applicable, have the data corrected and the profiling decision reevaluated based upon the corrected data. We do not engage in such profiling.

10. Exercising Your Rights

You may access, review, modify, and request deletion of any Personal Information that we Process about you, as required by law. You may submit such a request by one of the following: (i) send an email to privacy@sift.com, (ii) complete this webform, or (iii) call us toll free at 877-571-0124. To protect your privacy and security, we may need to take reasonable steps to verify your identity before responding to your request. Specifically, we (or our third party service provider acting on our behalf) may need to collect a copy of your photo ID and any other information necessary to confirm your identity. Such information will be securely Processed in accordance with this Notice and only used for the purpose of verifying your identity. Following verification the information submitted will be deleted by the third party service provider.

You may opt out of the processing of your Personal Information for targeted advertising purposes here. If you implement browser-based opt-out preference signals (Global Privacy Control or “GPC”), Sift will opt you out of the Sale of your Personal Information and Sharing of your Personal Information for cross-context behavioral advertising. You can implement these signals through your browser settings for browsers that offer them. Please refer to your browser for additional information and instructions. Please note that these signals are applied to the browser or device, plus to the account or known profile where the consumer is logged in or identifiable. Opt-outs apply to the browser or device and that clearing cookies may require re-opting out, if the mechanism is cookie-based.

You may authorize another person (your “agent”) to submit a request on your behalf through the methods described above. Your authorized agent should submit proof that you gave the agent signed permission to submit the request. We may still require you to directly verify your identity and directly confirm that you have provided the authorized agent permission to submit the request.

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Appeals

If we decline to take action on your request to exercise your rights under the State Privacy Laws, we will tell you why in our response. If you live in a state that gives you the right to appeal, you may appeal our decision within the period permitted by applicable law. To do so, email dpo@sift.com with the subject line “Privacy Request Appeal”. Please include your name, the email address you used for your original request, and the reason you believe the decision was wrong. There is no charge for an appeal.

We will review your appeal and respond in writing within the period permitted by applicable law, and we will explain the reasons for our decision. Where the law permits, we may extend this period if reasonably necessary, and we will let you know if we do. The person who decides your appeal will not be the person who made the original decision, where feasible.

If we deny your appeal, or if we do not respond within the required time, you may contact your state Attorney General to submit a complaint: Please note that residents of Colorado, Connecticut, Delaware, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas and Virginia residents have the right to appeal. You can find the contact details of your Attorney General here.

California residents do not have a statutory appeal right but may contact the California Privacy Protection Agency or the California Attorney General. Utah residents do not have a statutory appeal right.

11. Non-discrimination for Exercising Your Rights

We will not discriminate against you for exercising any of your rights under the State Privacy Laws. Unless permitted by the applicable State Privacy Laws, we will not deny you goods or services; charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties; provide you a different level or quality of goods or services; or suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services. However, we may offer you certain financial incentives permitted by the State Privacy Laws that can result in different prices, rates or quality levels. Any permitted financial incentive we offer will reasonably relate to your Personal Information’s value and contain written terms that describe the program’s material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

12. Changes to this Notice

We may revise this Notice from time to time in response to changing legal, technical, or business developments. The most current version of this Notice will govern our use of your Personal Information. If we make any material

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changes to this Notice, we will post the updated version here. You can see when this Notice was last updated by checking the “last updated” or “effective” date displayed at the top of this Notice.

13. Contact Details

Please contact Sift with any questions or comments about this Notice or our privacy practices at:

Sift Science, Inc.
c/o Industrious
Attn: Privacy Office
77 Geary Street, Suite 509, San Francisco, California, 94108
Email: privacy@sift.com

14. Further Privacy Resources

Service Privacy Notice
Website Privacy Notice
Website Cookie Notice
Terms of Service

Download Here

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