

## AMEELIO PRIVACY POLICY

**Effective date:** 06.17.2021

Ameelio Inc. (“Ameelio,” “we,” “our,” and/or “us”) values the privacy of individuals who use our website, app, and related online services (collectively, our “Services” or “Platform”). This privacy policy (the “Privacy Policy”) explains how we collect, use, and share information from users of our Services (“Users”, “you”, and/or “your”) By using our Services, you agree to the collection, use, disclosure, and procedures this Privacy Policy describes. Beyond the Privacy Policy, your use of our Services is also subject to our Terms of Service ([[https://ameelio.org/TOS\\_connect.pdf](https://ameelio.org/TOS_connect.pdf)]).

### INFORMATION WE COLLECT

We may collect a variety of information from or about you or your devices from various sources, as described below.

#### Information You Provide to Us

- **Registration and Profile Information.** When you sign up for an account, we will ask you for information such as your name, email address, mailing address, demographic information, and form of official identification. If you are signing up to contact an incarcerated individual, we will also ask you to designate your relationship to the incarcerated individual.
- **Communications.** If you contact us directly, we may receive additional information about you. For example, if you contact us for customer support, we may receive your name, email address, your unique identifier, the contents of the message and any attachments you send to us, and any other information you choose to provide.
- **Payment Information.** If you make a purchase through our Services, your payment-related information, such as credit card or other financial information, is collected by our third party payment processor on our behalf.
- **User Feedback Survey.** If you choose to participate in a user feedback survey, then Ameelio will collect information from you such as call quality, demographic data, and how the service has impacted you. Participation in these feedback interviews is entirely voluntary.

#### Information We Collect When You Use Our Services

- **Video and Audio Recordings.** When you use our Service to place a call, the entire call will be recorded and stored by Ameelio. This includes both the video and audio components of the call (i.e. your voice and likeness will both be part of the call

recording).

- **Location Information.** When you use our Services, we may infer your general location information, for example, by using your internet protocol (IP) address.
- **Device Information.** We receive information about the device and software you use to access our Services, such as your IP address, web browser type, operating system version, phone carrier and manufacturer, application installations, device identifiers, mobile advertising identifiers, and push notification tokens.
- **Usage Information.** To help us understand how you use our Services and to help us improve them, we automatically receive information about your interactions with our Services, such as the pages or other content you view through our Services and the dates and times of those visits.
- **Information from Cookies and Similar Technologies.** We and third party partners collect information using cookies, pixel tags, or similar technologies. Our third party partners, such as analytics and advertising partners, may use these technologies to collect information about your online activities over time and across different services. Cookies are small text files containing a string of alphanumeric characters. We may use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to our Services. Please review your web browser's "Help" file to learn the proper way to modify your cookie settings. Please note that if you delete or choose not to accept cookies from the Service, you may not be able to utilize the features of the Service to their fullest potential.

#### Information We Receive from Third Parties

- **Correctional Facilities.** If you are incarcerated, we may receive additional information about you, such as a unique identifier assigned to you, from your correctional facility. The information we receive from the correctional facility will be determined by our agreement with the facility and may include any of your information maintained by the correctional facility.
- **Community Partners.** We may receive additional information about you, such as enrollment and membership information, from third parties such as colleges, reentry organizations, probation offices, ministries and counselors to help us understand how our Services are used.

#### **HOW WE USE THE INFORMATION WE COLLECT**

We may use the information we collect:

- To provide, maintain, improve, and enhance our Services;
- To understand and analyze how you use our Services and develop new products, services, features, and functionality;
- To communicate with you, provide you with updates and other information relating to our Services, provide information that you request, respond to comments and questions, and otherwise provide customer support;
- For marketing and advertising purposes, such as developing and providing promotional and advertising materials that may be relevant, valuable or otherwise of interest to you;
- To generate anonymized, aggregate data containing only de-identified, non-personal information that we may use to publish reports;
- To facilitate transactions and payments;
- To find and prevent fraud, and respond to trust and safety issues that may arise;
- For compliance purposes, including enforcing our Terms of Service or other legal rights, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency; and
- For other purposes for which we provide specific notice at the time the information is collected.

#### HOW WE SHARE THE INFORMATION WE COLLECT

- **Affiliates.** We may share any information we receive with our affiliates for any of the purposes described in this Privacy Policy.
- **Vendors and Service Providers.** We may share any information we receive with vendors and service providers retained in connection with the provision of our Services.
- **Research Partners.** We may share information we receive or collect with our research partners.
- **Analytics Partners.** We use analytics services such as Amplitude to collect and process certain analytics data. These services may also collect information about your use of other websites, apps, and online resources.
- **Correctional Facilities.** We may share any and all information we collect with

correctional facilities, including the correctional facility where the incarcerated individual on the video call is located. For example, correctional facilities will be able to review the recordings of every call that is placed using our Services, and will also have the ability to join calls as an invisible call member.

- **As Required By Law and Similar Disclosures.** We may access, preserve, and disclose your information if we believe doing so is required or appropriate to: (a) comply with law enforcement requests and legal process, such as a court order or subpoena; (b) respond to your requests; or (c) protect your, our, or others' rights, property, or safety.
- **Merger, Sale, or Other Asset Transfers.** We may transfer your information to service providers, advisors, potential transactional partners, or other third parties in connection with the consideration, negotiation, or completion of a corporate transaction in which we are acquired by or merged with another company or we sell, liquidate, or transfer all or a portion of our assets. The use of your information following any of these events will be governed by the provisions of this Privacy Policy in effect at the time the applicable information was collected.
- **Consent.** We may also disclose your information with your permission.

## SECURITY

We make reasonable efforts to protect your information by using safeguards designed to improve the security of the information we maintain. However, as no electronic transmission or storage of information can be entirely secure, we can make no guarantees as to the security or privacy of your information.

## CHILDREN

We do not knowingly collect, maintain, or use personal information from children under 13 years of age, and no part of our Services is directed to children. If you learn that a child has provided us with personal information in violation of this Privacy Policy, then you may alert us at [support@ameelio.org](mailto:support@ameelio.org).

## INTERNATIONAL TRANSFERS OF DATA

Our Services are hosted in the United States and intended for visitors located within the United States. If you choose to use the Services from the European Union or other regions of the world with laws governing data collection and use that may differ from U.S. law, then please note that you are transferring your personal information outside of those regions to the United States for storage and processing. Also, we may transfer your data from the U.S. to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating the Services. By providing any information, including personal information, on or to

the Services, you consent to such transfer, storage, and processing.

### **ACCESSING/UPDATING YOUR INFORMATION**

You can update your account and profile information or close your account by contacting us at [support@ameelio.org](mailto:support@ameelio.org).

### **CHANGES TO THIS PRIVACY POLICY**

We will post any adjustments to the Privacy Policy on this page, and the revised version will be effective when it is posted. If we materially change the ways in which we use or share personal information previously collected from you through the Services, we will notify you through the Services, by email, or other communication.

### **CONTACT US**

If you have any questions, comments, or concerns about our processing activities, please email us at [support@ameelio.org](mailto:support@ameelio.org) or write to us at 50 Brewery Street, P.O. Box #8382, New Haven, CT 06530. If you choose to email us, please include “privacy policy” in the subject line of your email.