

Last Updated: 03/2/26

URSULA COMPANION CORP. (doing business as “Company Picnic,” “we,” “our,” and/or “us”) values the privacy of individuals who use our application, website (including <https://companypicnic.com/>), and related services (collectively, our “Services”). This privacy policy (the “Privacy Policy”) explains how we collect, use, and disclose personal information from users of our Services (“you” or “your”). As used in this Privacy Policy, “personal information” means any information relating to an identified or identifiable individual. By using our Services, you agree to the collection, use, disclosure, and procedures described in this Privacy Policy. Beyond the Privacy Policy, your use of our Services is also subject to our [INSERT: your Terms of Services URL].

## Personal Information We Collect

We may collect a variety of personal information from or about you or your devices from various sources, as described below. Where applicable, we indicate whether and why you must provide us with your personal information, as well as the consequences of failing to do so. If you do not provide your personal information when requested, you may not be able to use our Services if that personal information is necessary to provide you with our Services or if we are legally required to collect it.

### A. Personal Information You Provide to Us

**Characters.** When you create a character, we will receive your first name and the name you select for your character.

**Character Interactions.** When you interact with your character, we may receive your phone number, audio information (including sound or voice recordings), text, and image data from that interaction. The Services allow you to submit this audio information, text, image data, and other materials to the Services (“Prompts”), which generate responses based on your Prompts (“Outputs”). If you include personal information in your Prompts, we will collect that information, and this information may be reproduced in the Outputs.

Communications. If you contact us directly, we may receive personal information about you. For example, when you contact us for customer support purposes, we may receive your name, email address, the contents of a message or attachments that you may send to us, and other information you choose to provide. When you communicate with us, third party vendors may receive and store these communications on our behalf.

Payment Information. If you make a purchase through our Services, we may receive payment-related information, such as name, mailing address, and telephone number.

## B. Personal Information We Collect When You Use Our Services

Location Information. When you use our Services, we 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, including IP address, web browser type, operating system version, phone carrier and manufacturer, application installations, device identifiers, and push notification tokens.

Usage Information. To help us understand how you use our Services and to help us improve it, we automatically receive information about your interactions with our Services like the pages or other content you view and the dates and times of your visits.

Information from Cookies and Similar Technologies. We and our third-party partners collect personal information using cookies, pixel tags, or similar technologies. Our third-party partners, such as analytics 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 our Services, you may not be able to utilize the features of our Services to their fullest potential.

Text Information. We work with a third-party partner to send you iMessages. We receive information about these communications, such as the date and time of the iMessage and the content of any iMessages.

### C. Personal Information We Receive from Other Sources

Information from Discord. If you choose to join our Discord server, we may receive information about you, including your username, display name, ID, profile picture, and your activity in the Company Picnic Discord server. We use this information to manage our community, provide support, and improve our Services. If you wish to limit the information available to us, you should visit the privacy settings of your Discord account to learn about your options. You understand and agree that the use of your information by Discord will be governed by Discord's privacy policy.

### How We Use the Personal Information We Collect

We use the personal information we collect:

- To provide, maintain, improve, and enhance our Services;
- To personalize your experiences of our Services, such as by providing tailored content and recommendations;
- 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;
- To send you text messages and push notifications;
- To facilitate transactions and payments;

- To generate deidentified or aggregated data containing only de-identified, non-personal information that we may use for any lawful purpose;
- To train, develop, and improve our artificial intelligence and machine learning models;
- 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 personal information is collected.

## Your Rights Under the California Consumer Privacy Act (CCPA)

If you are a California resident, the California Consumer Privacy Act ("CCPA"), as amended by the California Privacy Rights Act ("CPRA"), provides you with certain rights regarding your personal information. This section describes those rights and how you may exercise them.

**Right to Know.** You have the right to request that we disclose what personal information we have collected about you over the past 12 months, including the categories of personal information collected, the specific pieces of personal information collected, the categories of sources from which we collected the personal information, the business or commercial purpose for collecting the information, and the categories of third parties with whom we shared the personal information.

**Right to Delete.** You have the right to request that we delete any personal information we collected from you, subject to certain exceptions. For example, we may retain personal information as necessary to complete the transaction for which it was collected, provide you with ongoing support, complete internal analytics, comply with legal obligations, or make other lawful disclosures.

**Right to Correct.** You have the right to request that we correct inaccurate personal information that we maintain about you.

**Right to Opt-Out of Sale or Sharing.** You have the right to opt out of the sale or sharing of your personal information. If we sell or share your personal information, you may exercise this right by submitting a request as described below.

**Right to Limit Use of Sensitive Personal Information.** If we use your sensitive personal information for purposes beyond providing the Services or other permitted uses under the CCPA, you have the right to direct us to limit such use.

**Right to Non-Discrimination.** You have the right not to be discriminated against for exercising your rights under the CCPA. We will not deny you goods or services, charge you different prices or rates, provide you a different level or quality of goods or services, or retaliate against you for exercising your CCPA rights.

**How to Exercise Your Rights.** To exercise any of the above rights, you may contact us by emailing us at [basket@companypicnic.com](mailto:basket@companypicnic.com) or by writing to us at 29 Little W 12th Street, New York, NY 10014. We will respond to verifiable consumer requests within 45 days. We may ask you to provide information to verify your identity before fulfilling your request.

**Authorized Agent.** You may authorize another person or entity to submit a request on your behalf. If you use an authorized agent to submit a request, we may require you to take steps to verify your identity directly with us and to verify that the authorized agent has your written permission to make the request.

## Legal Bases for Processing European Personal Information

If you are located in the European Economic Area (“EEA”) or the United Kingdom (“UK”), we only process your personal information when we have a valid “legal basis,” including as set forth below.

- **Consent.** We may process your personal information where you have consented to certain processing of your personal information.
- **Contractual Necessity.** We may process your personal information where required

to provide you with the Services. For example, we may need to process your personal information to respond to your inquiries or requests.

- Compliance with a Legal Obligation. We may process your personal information where we have a legal obligation to do so. For example, we may process your personal information to comply with tax, labor and accounting obligations.
- Vital interests. We may process your personal information in order to protect your vital interests, or the vital interests of another natural person.
- Legitimate Interests. We may process your personal information where we or a third party have a legitimate interest in processing your personal information. Specifically, we have a legitimate interest in using your personal information for product development and internal analytics purposes, and otherwise to improve the safety, security, and performance of the Services. We only rely on our or a third party's legitimate interests to process your personal information when these interests are not overridden by your rights and interests.

## How We Disclose the Personal Information We Collect

**Partners and Affiliates.** We may disclose any information we receive to our partners, corporate affiliates, parents, or subsidiaries for any purpose described in this Privacy Policy.

**Vendors and Service Providers.** We may disclose any information we receive to vendors and service providers retained in connection with the provision of our Services.

**AI Service Providers.** We may disclose information we receive to vendors that provide artificial intelligence services that provide backend support for our Services.

**Analytics Partners.** We use analytics services such as Mixpanel to collect and process certain analytics data. These services may also collect information about your use of other websites, apps, and online resources. You can learn more about Mixpanel's practices by visiting <https://mixpanel.com/legal/privacy-policy/>.

**As Required by Law and Similar Disclosures.** We may access, preserve, and disclose your personal 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. For the avoidance of doubt, the disclosure of your personal information may occur if you post any objectionable content on or through our Services.

**Merger, Sale, or Other Asset Transfers.** We may use, transfer, disclose, or otherwise process your personal 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.

## Your Choices

**Your California Privacy Rights.** If you are a California resident, you have the rights described in the "Your Rights Under the California Consumer Privacy Act (CCPA)" section above, including the right to know, delete, correct, and opt out of the sale or sharing of your personal information.

You may exercise these rights by contacting us at [basket@companypicnic.com](mailto:basket@companypicnic.com) or by writing to us at 29 Little W 12th Street, New York, NY 10014. We will respond to verifiable consumer requests within 45 days. Before fulfilling your request, we may ask you to provide reasonable information to verify your identity. Please note that there are exceptions and limitations to each of these rights, and that while any changes you make will be reflected in active user databases instantly or within a reasonable period of time, we may retain personal information for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that we have a legitimate reason to do so.

**Your European Privacy Rights.** If you are located in the EEA or the UK, you have additional rights described below.

- You may request access to the personal information we maintain about you, update, and correct inaccuracies in your personal information, restrict or object to the processing of your personal information, have your personal information anonymized or deleted, as appropriate, or exercise your right to data portability to easily transfer your personal information to another company. In addition, you have the right to lodge a complaint with a supervisory authority, including in your country of residence, place of work or where an incident took place.
- You may withdraw any consent you previously provided to us regarding the processing of your personal information at any time and free of charge. We will apply your preferences going forward and this will not affect the lawfulness of the processing before you withdrew your consent.
- You may exercise these rights by contacting us using the contact details at the end of this Privacy Policy. Before fulfilling your request, we may ask you to provide reasonable information to verify your identity. Please note that there are exceptions and limitations to each of these rights, and that while any changes you make will be reflected in active user databases instantly or within a reasonable period of time, we may retain personal information for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that we have a legitimate reason to do so.

## Third Parties

Our Services may contain links to other websites, products, or services that we do not own or operate. We are not responsible for the privacy practices of these third parties. Please be aware that this Privacy Policy does not apply to your activities on these third-party services or any information you disclose to these third parties. We encourage you to read their privacy policies before providing any information to them.

## Retention

When you request that we do so, we take measures to delete your personal information or keep it in a form that does not permit identifying you when this personal information is no longer necessary for the purposes for which we process it, unless we are required by law to keep this information for a longer period. When we process personal information



for our own purposes, we determine the retention period taking into account various criteria, such as the type of services provided to you, the nature and length of our relationship with you, possible re-enrollment with the Services, the impact on the Services we provide to you if we delete some personal information from or about you, and mandatory retention periods provided by law and the statute of limitations.

## Security

We make reasonable efforts to protect your personal information by using physical and electronic safeguards designed to improve the security of the personal 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 personal information.

## Children's Privacy

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 [basket@companypicnic.com](mailto:basket@companypicnic.com).

## International Visitors

Our Services are hosted in the United States ("U.S."). If you choose to use our Services from the EEA, the UK 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 U.S. for storage and processing. We may transfer personal information from the EEA or the UK to the U.S. and other third countries based on European Commission-approved or UK Government-approved Standard Contractual Clauses, or otherwise in accordance with applicable data protection laws. Also, we may transfer your personal information from the U.S. to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating our Services. By providing any information, including personal

information, on or through our Services, you consent to such transfer, storage, and processing. For more information about the tools that we use to transfer personal information, or to obtain a copy of the contractual safeguards we use for such transfers (if applicable), you can contact us as described below.

### Delete Your Information

If you'd like to delete your information from the Services, please send us a message at [basket@companypicnic.com](mailto:basket@companypicnic.com) with your name (as entered when first using the app) and the date of your last app session.

### 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 disclose personal information previously collected from you through our Services, we will notify you through our Services, by email, or other communication.

### Contact Information

If you have any questions, comments, or concerns about our processing activities, please email us at [basket@companypicnic.com](mailto:basket@companypicnic.com) or write to us at:  
29 Little W 12th Street New York, NY 10014