

PRIVACY POLICY

Last updated: Jan 5, 2025

This Privacy Policy (the “Privacy Policy”) for Boulevard Legacy LLC, doing business as Boulevard Legacy, a company registered in Delaware, United States at 131 Continental Dr, Suite 305, Newark, DE 19713 (“we,” “us,” or “our”), describes how and why we might access, collect, store, use, and/or share (“process”) your personal information when you use our mobile application Pillar (the “App”), as well as any other products, application and/or services that links to this Privacy Policy (collectively, the “Services”), including when you:

- Download, install, access and/or use our App, or the Services
- Engage with us in other related ways, including but not limited to any sales, marketing, or events

This Privacy Policy constitutes a legally binding agreement made between you, whether personally or on behalf of an entity (“you,” “your”), and us, concerning your access to and use of the Services. You agree that by downloading, installing, accessing and/or using the Services, or by clicking a button or checking a box marked “I Agree” (or something similar) you have read, understood, and agreed to be bound by all of this Privacy Policy. IF YOU DO NOT AGREE WITH ALL OF THIS PRIVACY POLICY, THEN YOU ARE EXPRESSLY PROHIBITED FROM USING THE SERVICES AND YOU MUST DISCONTINUE USE IMMEDIATELY. If these Privacy Policy are considered to be an offer, then acceptance is expressly limited to this Privacy Policy.

You must ensure that others are aware of this Privacy Policy. You are responsible for ensuring that all persons who download, install, access and/or use our Services through your internet connection or mobile devices are aware of this Privacy Policy and that those individuals comply with such Privacy Policy.

By using the Service, you affirm that you are of legal age to enter into this Privacy Policy, or, if you are not, that you have obtained parental or guardian consent to enter into this Privacy Policy and your parent or guardian consents to this Privacy Policy on your behalf. If you violate or do not agree to these Privacy Policy, then your access to and use of the Service is unauthorized, you are expressly prohibited from using the Service and you must immediately discontinue use of all Service.

We recommend that you print a copy of this Privacy Policy for your records and that you print any modified Privacy Policy which later becomes available.

Questions or concerns? Reading this Privacy Policy will help you understand your privacy rights and choices. We are responsible for making decisions about how your personal information is processed. If you still have any questions or concerns, please contact us at benjamin@thepillar.app.

SUMMARY OF KEY POINTS

This summary provides key points from our Privacy Policy, but you can find out more details about any of these topics by clicking the link following each key point or by using our table of contents below to find the section you are looking for.

What personal information do we process? When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make, and the products and features you use. Learn more about personal information you disclose to us.

Do we process any sensitive personal information? Some of the information may be considered "special" or "sensitive" in certain jurisdictions, for example your racial or ethnic origins, sexual orientation, and religious beliefs. We may process sensitive personal information when necessary with your consent or as otherwise permitted by applicable law. Learn more about sensitive information we process.

Do we collect any information from third parties? We do not collect any information from third parties.

How do we process your information? We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so. Learn more about how we process your information.

In what situations and with which parties do we share personal information? We may share information in specific situations and with specific third parties. Learn more about when and with whom we share your personal information.

How do we keep your information safe? We have adequate organizational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Learn more about how we keep your information safe.

What are your rights? Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information. Learn more about your privacy rights.

How do you exercise your rights? The easiest way to exercise your rights is by submitting a data subject access request, or by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

Want to learn more about what we do with any information we collect? Review the Privacy Policy in full.

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1. WHAT INFORMATION DO WE COLLECT?

1.1. Personal information you disclose to us

We collect personal information that you voluntarily provide to us when you register on the Services, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

- *Personal Information Provided by You.* The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include, but are not limited to the following:
 - names
 - phone numbers
 - mailing addresses
 - usernames
 - contact preferences
 - passwords
 - email addresses
 - billing addresses
 - debit/credit card numbers
 - contact or authentication data
- *Sensitive Information.* When necessary, with your consent or as otherwise permitted by applicable law, we process the following categories of sensitive information:
 - health data
- *Payment Data.* We may collect data necessary to process your payment if you choose to make purchases, such as your payment instrument number, and the security code associated with your payment instrument. All payment data is handled and stored by Apple or Google depending on whether you use the Apple Store or Google Play. You may find their privacy notice link(s) here: <https://www.apple.com/legal/privacy/en-ww/> or <https://policies.google.com/privacy>.

- *Social Media Login Data.* We may provide you with the option to register with us using your existing social media account details, like your Facebook, X, or other social media account. If you choose to register in this way, we will collect certain profile information about you from the social media provider, as described in the section called "HOW DO WE HANDLE YOUR SOCIAL LOGINS?" below.
- *Application Data.* If you use our App and/or Services, we also may collect the following information if you choose to provide us with access or permission:
 - *Geolocation Information.* We may request access or permission to track location-based information from your mobile device, either continuously or while you are using our mobile application(s), to provide certain location-based services. If you wish to change our access or permissions, you may do so in your device's settings.
 - *Mobile Device Access.* We may request access or permission to certain features from your mobile device, including but not limited to your mobile device's bluetooth, camera, microphone, reminders, contacts, calendar, sensors, sms messages, social media accounts, and other features. If you wish to change our access or permissions, you may do so in your device's settings.
 - *Mobile Device Data.* We automatically collect device information (including, but not limited to your mobile device ID, model, and manufacturer), operating system, version information and system configuration information, device and application identification numbers, browser type and version, hardware model Internet service provider and/or mobile carrier, and Internet Protocol (IP) address (or proxy server). If you are using our App and/or Services, we may also collect information about the phone network associated with your mobile device, your mobile device's operating system or platform, the type of mobile device you use, your mobile device's unique device ID, and information about the features of our App and/or Services you accessed.
 - *Push Notifications.* We may request to send you push notifications regarding your account or certain features of the App and/or Services . If you wish to opt out from receiving these types of communications, you may turn them off in your device's settings.

This information is primarily needed to maintain the security and operation of our App and/or Services, for troubleshooting, and for our internal analytics and reporting purposes.

All personal information that you provide to us must be true, current, complete, and accurate, and you must notify us immediately of any changes to such personal information.

1.2. Information automatically collected

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include, but is not limited to device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This

information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies. Specific information about how we use such technologies and how you can refuse certain cookies is set out in Section 11.4 of this Privacy Policy titled “Cookies and similar technologies”.

The information we collect includes:

- **Log and Usage Data.** Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include, but is not limited to your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called "crash dumps"), and hardware settings).
- **Device Data.** We collect device data including, but not limited to information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include, but is not limited to information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.
- **Location Data.** We collect location data including, but not limited to information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the Services.

1.3. Google API

Our use of information received from Google APIs will adhere to Google API Services User Data Policy, including the Limited Use requirements.

1.4. Do We Collect Information From Minors?

We do not knowingly accept, request, or solicit information from children or knowingly market to children. Therefore, in accordance with the U.S. Children’s Online Privacy Protection Act, if we receive actual knowledge that anyone under the age of 13 has provided personal information to us without the requisite and verifiable parental consent, we will delete that information from the Services as quickly as is reasonably practical and we will deactivate the account. If you become aware of any data we may have collected from children under age 13, please contact us at benjamin@thepillar.app.

2. HOW DO WE PROCESS YOUR INFORMATION?

We process your personal information for a variety of reasons, depending on how you interact with our Services, including, but not limited to:

- To facilitate account creation and authentication and otherwise manage user accounts. We may process your information so you can create and log in to your account, as well as keep your account in working order.
- To deliver and facilitate delivery of services to the user. We may process your information to provide you with the requested service.
- To respond to user inquiries/offer support to users. We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- To send administrative information to you. We may process your information to send you details about our products and services, changes to our terms and policies, and other similar information.
- To fulfill and manage your orders. We may process your information to fulfill and manage your orders, payments, returns, and exchanges made through the Services.
- To enable user-to-user communications. We may process your information if you choose to use any of our offerings that allow for communication with another user.
- To request feedback. We may process your information when necessary to request feedback and to contact you about your use of our Services.
- To send you marketing and promotional communications. We may process the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt out of our marketing emails at any time. For more information, see "WHAT ARE YOUR PRIVACY RIGHTS?" below.
- To deliver targeted advertising to you. We may process your information to develop and display personalized content and advertising tailored to your interests, location, and more.
- To protect our Services. We may process your information as part of our efforts to keep our Services safe and secure, including but not limited to fraud monitoring and prevention.
- To identify usage trends. We may process information about how you use our Services to better understand how they are being used so we can improve them.
- To determine the effectiveness of our marketing and promotional campaigns. We may process your information to better understand how to provide marketing and promotional campaigns that are most relevant to you.
- To save or protect an individual's vital interest. We may process your information when necessary to save or protect an individual's vital interest, including but not limited to preventing harm.

3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

If you are located in the EU or UK, this section applies to you.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- Consent. We may process your information if you have given us permission (i.e., consent) to use your personal information for a specific purpose. You can withdraw your consent at any time. Learn more about withdrawing your consent.
- Performance of a Contract. We may process your personal information when we believe it is necessary to fulfill our contractual obligations to you, including but not limited to providing our Services or at your request prior to entering into a contract with you.
- Legitimate Interests. We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described in order to:
 - Send users information about special offers and discounts on our products and services
 - Develop and display personalized and relevant advertising content for our users
 - Analyze how our Services are used so we can improve them to engage and retain users
 - Support our marketing activities
 - Diagnose problems and/or prevent fraudulent activities
 - Understand how our users use our products and services so we can improve user experience
- Legal Obligations. We may process your information where we believe it is necessary for compliance with our legal obligations, including but not limited to cooperating with a law enforcement body or regulatory agency, exercising or defending our legal rights, or disclosing your information as evidence in litigation in which we are involved.
- Vital Interests. We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, including but not limited to situations involving potential threats to the safety of any person.

If you are located in Canada, this section applies to you.

We may process your information if you have given us specific permission (i.e., express consent) to use your personal information for a specific purpose, or in situations where your permission can be inferred (i.e., implied consent). You can withdraw your consent at any time.

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, but not limited to:

- If collection is clearly in the interests of an individual and consent cannot be obtained in a timely way
- For investigations and fraud detection and prevention
- For business transactions provided certain conditions are met
- If it is contained in a witness statement and the collection is necessary to assess, process, or settle an insurance claim
- For identifying injured, ill, or deceased persons and communicating with next of kin
- If we have reasonable grounds to believe an individual has been, is, or may be victim of financial abuse
- If it is reasonable to expect collection and use with consent would compromise the availability or the accuracy of the information and the collection is reasonable for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province
- If disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records
- If it was produced by an individual in the course of their employment, business, or profession and the collection is consistent with the purposes for which the information was produced
- If the collection is solely for journalistic, artistic, or literary purposes
- If the information is publicly available and is specified by the regulations

4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

We may need to share your personal information in the following situations:

- *Business Transfers*. We may share or transfer your information in connection with, or during negotiations of, any merger, sale of our company assets, financing, or acquisition of all or a portion of our business to another company.
- *When we use Google Maps Platform APIs*. We may share your information with certain Google Maps Platform APIs (e.g., Google Maps API, Places API). Google Maps uses GPS, Wi-Fi, and cell towers to estimate your location. GPS is accurate to about 20 meters, while Wi-Fi and cell towers help improve accuracy when GPS signals are weak, like indoors. This data helps Google Maps provide directions, but it is not always perfectly precise.
- *Affiliates*. We may share your information with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include but are not limited to our parent company and any subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.

- *Business Partners*. We may share your information with our business partners to offer you certain products, services, or promotions.
- *Other Users*. When you share personal information (including, but not limited to posting comments, contributions, or other content to the Services) or otherwise interact with public areas of the Services, such personal information may be viewed by all users and may be publicly made available outside the Services in perpetuity. If you interact with other users of our Services and register for our Services through a social network (including, but not limited to Facebook), your contacts on the social network will see your name, profile photo, and descriptions of your activity. Similarly, other users will be able to view descriptions of your activity, communicate with you within our Services, and view your profile.
- *Offer Wall*. Our application(s) may display a third-party hosted "offer wall." Such an offer wall allows third-party advertisers to offer, among other things, virtual currency, gifts, or other items to users in return for the acceptance and completion of an advertisement offer. Such an offer wall may appear in our application(s) and be displayed to you based on certain data, including, but not limited to your geographic area or demographic information. When you click on an offer wall, you will be brought to an external website belonging to other persons and will leave our application(s). A unique identifier, such as your user ID, will be shared with the offer wall provider in order to prevent fraud and properly credit your account with the relevant reward.

5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

We may use cookies and similar tracking technologies (including, but not limited to web beacons and pixels) to gather information when you interact with our Services. Some online tracking technologies help us maintain the security of our Services and your account, prevent crashes, fix bugs, save your preferences, and assist with basic site functions.

We also permit third parties and service providers to use online tracking technologies on our Services for analytics and advertising, including but not limited to to help manage and display advertisements, to tailor advertisements to your interests, or to send abandoned shopping cart reminders (depending on your communication preferences). The third parties and service providers use their technology to provide advertising about products and services tailored to your interests which may appear either on our Services or on other websites.

To the extent these online tracking technologies are deemed to be a "sale"/"sharing" (which includes, but is not limited to targeted advertising, as defined under the applicable laws) under applicable US state laws, you can opt out of these online tracking technologies by submitting a request as described below under section "DO UNITED STATES RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?"

Specific information about how we use such technologies and how you can refuse certain cookies is set out in Section 11.4 of this Privacy Policy titled "Cookies and similar technologies".

5.1. Google Analytics

We may share your information with Google Analytics to track and analyze the use of the Services. The Google Analytics Advertising Features that we may use include, but are not limited to: Remarketing with Google Analytics, Google Analytics Demographics and Interests Reporting and Google Display Network Impressions Reporting. To opt out of being tracked by Google Analytics

across the Services, visit <https://tools.google.com/dlpage/gaoptout>. You can opt out of Google Analytics Advertising Features through Ads Settings and Ad Settings for mobile apps. Other opt out means include <http://optout.networkadvertising.org/> and <http://www.networkadvertising.org/mobile-choice>. For more information on the privacy practices of Google, please visit the Google Privacy & Terms page.

6. DO WE OFFER ARTIFICIAL INTELLIGENCE-BASED PRODUCTS?

As part of our Services, we offer products, features, or tools powered by artificial intelligence, machine learning, or similar technologies (collectively, "AI Products"). These tools are designed to enhance your experience and provide you with innovative solutions. The terms in this Privacy Policy govern your use of the AI Products within our Services.

6.1. Use of AI Technologies

We provide the AI Products through third-party service providers ("AI Service Providers"), including but not limited to OpenAI. As outlined in this Privacy Policy, your input, output, and personal information will be shared with and processed by these AI Service Providers to enable your use of our AI Products for purposes outlined in "WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR PERSONAL INFORMATION?" You must not use the AI Products in any way that violates the terms or policies of any AI Service Provider.

6.2. Our AI Products

Our AI Products are designed for the following functions:

- AI applications
- Image generation

6.3. How We Process Your Data Using AI

All personal information processed using our AI Products is handled in line with our Privacy Policy and our agreement with third parties. This ensures high security and safeguards your personal information throughout the process, giving you peace of mind about your data's safety.

7. HOW DO WE HANDLE YOUR SOCIAL LOGINS?

Our Services offer you the ability to register and log in using your third-party social media account details (including, but not limited to your Facebook or X logins). Where you choose to do this, we will receive certain profile information about you from your social media provider. The profile information we receive may vary depending on the social media provider concerned, but will often include your name, email address, friends list, and profile picture, as well as other information you choose to make public on such a social media platform.

We will use the information we receive only for the purposes that are described in this Privacy Policy or that are otherwise made clear to you on the relevant Services. Please note that we do not control, and are not responsible for, other uses of your personal information by your third-party social media provider. We recommend that you review their privacy notice to understand how they collect, use, and share your personal information, and how you can set your privacy preferences on their sites and apps.

8. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?

Our servers are located in the United States. If you are accessing our Services from outside the United States, please be aware that your information may be transferred to, stored by, and processed by us in our facilities and in the facilities of the third parties with whom we may share your personal information (see "WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?" above), in the United States, and other countries.

If you are a resident in the European Economic Area (EEA), United Kingdom (UK), or Switzerland, then these countries may not necessarily have data protection laws or other similar laws as comprehensive as those in your country. However, we will take all necessary measures to protect your personal information in accordance with this Privacy Policy and applicable law.

8.1. European Commission's Standard Contractual Clauses:

We have implemented measures to protect your personal information, including by using the European Commission's Standard Contractual Clauses for transfers of personal information between our group companies and between us and our third-party providers. These clauses require all recipients to protect all personal information that they process originating from the EEA or UK in accordance with European data protection laws and regulations. Our Standard Contractual Clauses can be provided upon request. We have implemented similar appropriate safeguards with our third-party service providers and partners and further details can be provided upon request.

8.2. EU-US, UK Extension to the EU-US, and Swiss-US Data Privacy Framework:

We and the following entities and subsidiaries: Boulevard Legacy LLC comply with the EU-US Data Privacy Framework, the UK Extension to the EU-US Data Privacy Framework, and the Swiss-US Data Privacy Framework as set forth by the US Department of Commerce with regard to the processing of personal data received from the EU, the UK (and Gibraltar), and Switzerland. We have certified to the US Department of Commerce that we adhere to the EU-US Data Privacy Framework Principles and the Swiss-US Data Privacy Framework Principles. If there is any conflict between the terms in this Privacy Policy and the Data Privacy Framework Principles, the Data Privacy Framework Principles shall govern. Learn more about the Data Privacy Framework Principles program.

Pursuant to the Data Privacy Framework Principles, EU, UK, and Swiss individuals have the right to obtain our confirmation of whether we maintain personal information relating to you in the United States. Upon request, we will provide you with access to the personal information that we hold about you. You may also correct, amend, or delete the personal information we hold about you. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data transferred to the United States under the Data Privacy Framework Principles, should direct their query to benjamin@thepillar.app. If requested to remove data, we will respond within a reasonable timeframe.

If we have received your personal information in the United States and subsequently transfer that information to a third party acting as our agent, and such third party agent processes your personal information in a manner inconsistent with the Data Privacy Framework Principles, we will remain liable unless we can prove we are not responsible for the event giving rise to the damage.

We will provide an individual opt-out choice, or opt-in for sensitive data, before we share your data with third parties other than our agents, or before we use it for a purpose other than which it was

originally collected or subsequently authorized. To request to limit the use and disclosure of your personal information, please submit a written request to benjamin@thepillar.app.

In compliance with the Data Privacy Framework Principles, we commit to resolve complaints about your privacy and our collection or use of your personal information transferred to the United States pursuant to the Data Privacy Framework. EU, UK, and Swiss individuals with Data Privacy Framework inquiries or complaints should first contact us by email at benjamin@thepillar.app. If you do not receive a timely acknowledgement of your complaint or if your complaint is not satisfactorily addressed, you may contact our independent dispute resolution provider based in the United States, BBB National Programs. Please visit <https://www.bbbprograms.org> for more information or to file a complaint. These services are provided to you free of charge.

If your Data Privacy Framework Principles complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms.

We are subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC). In certain situations, we may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Please be sure to review the following sections of this Privacy Policy for additional details relevant to our participation in the Data Privacy Framework Principles program:

- **WHAT INFORMATION DO WE COLLECT?** To learn more about the types of personal data we collect.
- **HOW DO WE PROCESS YOUR INFORMATION?** To learn more about the purposes for which we collect and use personal information about you.
- **WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?** To learn more about the type or identity of third parties to which we disclose personal information, and the purposes for which we do so.
- **WHAT ARE YOUR PRIVACY RIGHTS?** To learn more about the right of individuals to access their personal data.

9. HOW LONG DO WE KEEP YOUR INFORMATION?

We will only keep your personal information for as long as it is necessary for the purposes set out in this Privacy Policy, unless a longer retention period is required or permitted by law (including but not limited to tax, accounting, or other legal requirements). No purpose in this Privacy Policy will require us keeping your personal information for longer than the period of time in which users have an account with us.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such 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.

10. HOW DO WE KEEP YOUR INFORMATION SAFE?

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

11. WHAT ARE YOUR PRIVACY RIGHTS?

In some regions (like the EEA, UK, Switzerland, and Canada), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; (iv) if applicable, to data portability; and (v) not to be subject to automated decision-making. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us by using the contact details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS PRIVACY POLICY?" below.

We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your Member State data protection authority or UK data protection authority.

If you are located in Switzerland, you may contact the Federal Data Protection and Information Commissioner.

11.1. Withdrawing your consent: If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS PRIVACY POLICY?" below.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

11.2. Opting out of marketing and promotional communications: You can unsubscribe from our marketing and promotional communications at any time by clicking on the unsubscribe link in the emails that we send, replying "STOP" or "UNSUBSCRIBE" to the SMS messages that we send, or by contacting us using the details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS PRIVACY POLICY?" below. You will then be removed from the marketing lists. However, we may still communicate with you — for example, to send you service-related messages that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes.

11.3. Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Log in to your account settings and update your user account.
- Contact us using the contact information provided.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

11.4. Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services.

This Section 11.4 explains how we use cookies and similar technologies in connection with the Services.

Advertising Cookies: Used by Google, Meta, and Shopify to collect information about your activities across the Services. These are used to tailor relevant ads to you within our Services and/or elsewhere.

Analytics Cookies: Google Analytics may help us understand how our Services are performing and being used.

Essential Cookies: These Cookies are essential to provide you with services available through the Services and to enable you to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the Services, and we only use these Cookies to provide you with those Services. Google Tag Manager may be necessary for the technical operation of our Services.

Functionality/Performance Cookies: These Cookies allow us to remember choices you make when you use the Services, including, but not limited to remembering your login details or language preference. The purpose of these Cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you use the Services.

Your Rights and Choices: Like many companies online, we may use services provided by Google, Meta, and other companies that use tracking technology. Your choices for opting out of these companies' use of your personal information for interest-based advertising include:

- Blocking cookies in your browser: Most browsers let you remove or reject cookies, including cookies used for interest-based advertising. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. For more information about cookies, including how to see what cookies have been set on your device and how to manage and delete them, visit allaboutcookies.org.

- Blocking advertising ID use in your mobile settings: Your mobile device settings may provide functionality to limit use of the advertising ID associated with your mobile device for interest-based advertising purposes.
- Using privacy plug-ins or browsers: You can block our websites from setting cookies used for interest-based ads by using a browser with privacy features, like Brave, or installing browser plugins and configuring them to block third party cookies/trackers.
- Platform opt-outs: The following advertising partners offer opt-out features that let you opt-out of use of your information for interest-based advertising:
 - Google: <https://adssettings.google.com>
 - Facebook: <https://www.facebook.com/about/ads>
- Advertising industry opt-out tools: Some of our business partners that collect information about users' activities on or through the Sites or Apps may be members of organizations or programs that provide choices to individuals regarding the use of their browsing behavior or mobile application usage for purposes of targeted advertising. You can use the following opt-out options to limit use of your information for interest-based advertising by participating companies:
 - Digital Advertising Alliance: <http://optout.aboutads.info>
 - Network Advertising Initiative: <http://optout.networkadvertising.org/>
- Please note that we also may work with companies that offer their own opt-out mechanisms and may not participate in the opt-out mechanisms that we linked above.

If you choose to opt out of targeted advertisements, you will still see advertisements online but they may not be relevant to you. Even if you do choose to opt out, not all companies that serve online behavioral advertising are included in this list, so you may still receive some cookies and tailored advertisements from companies that are not listed.

If you want to remove previously-stored cookies, you can manually delete the cookies at any time. However, this will not prevent the Services from placing further cookies on your device unless and until you adjust your internet browser setting as described below.

If you prefer to avoid the use of cookies on the Services, first you must disable the use of cookies in your internet browser and then delete the cookies saved in your internet browser associated with the Services. You may use this option for preventing the use of cookies at any time.

If you do not accept our cookies, You may experience some inconvenience in your use of the Services and some features may not function properly.

If you would like to delete Cookies or instruct your internet browser to delete or refuse Cookies, please visit the help pages of your internet browser:

- For the Chrome web browser, please visit this page from Google: <https://support.google.com/accounts/answer/32050>

- For the Internet Explorer web browser, please visit this page from Microsoft:
<http://support.microsoft.com/kb/278835>
- For the Firefox web browser, please visit this page from Mozilla:
<https://support.mozilla.org/en-US/kb/delete-cookies-remove-info-websites-stored>
- For the Safari web browser, please visit this page from Apple:
<https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>
- For any other web browser, please visit your web browser's official web pages.

12. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Policy.

California law requires us to let you know how we respond to web browser DNT signals. Because there currently is not an industry or legal standard for recognizing or honoring DNT signals, we do not respond to them at this time.

13. DO UNITED STATES RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

13.1. Categories of Personal Information We Collect

We have collected the following categories of personal information in the past twelve (12) months:

Category	Examples	Collected
A. Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name	YES
B. Protected classification characteristics under state or federal law	Gender, age, date of birth, race and ethnicity, national origin, marital status, and other demographic data	YES
C. Commercial information	Transaction information, purchase history, financial details, and payment information	NO

D. Biometric information	Fingerprints and voiceprints	YES
E. Internet or other similar network activity	Browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems, and advertisements	NO
F. Geolocation data	Device location	YES
G. Audio, electronic, sensory, or similar information	Images and audio, video or call recordings created in connection with our business activities	YES
H. Professional or employment-related information	Business contact details in order to provide you our Services at a business level or job title, work history, and professional qualifications if you apply for a job with us	YES
I. Education Information	Student records and directory information	YES
J. Inferences drawn from collected personal information	Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics	YES
K. Sensitive personal Information	Account login information, biometric data, contents of email or text messages, debit or credit card numbers, racial or ethnic origin, national origin, health data, genetic data and financial information including account access details	YES

We only collect sensitive personal information, as defined by applicable privacy laws or the purposes allowed by law or with your consent. Sensitive personal information may be used, or disclosed to a service provider or contractor, for additional, specified purposes. You may have the right to limit the use or disclosure of your sensitive personal information. We do not collect or process sensitive personal information for the purpose of inferring characteristics about you.

We may also collect other personal information outside of these categories through instances where you interact with us in person, online, or by phone or mail in the context of:

- Receiving help through our customer support channels;
- Participation in customer surveys or contests; and
- Facilitation in the delivery of our Services and to respond to your inquiries.

We will use and retain the collected personal information as needed to provide the Services or for:

- Category A - As long as the user has an account with us
- Category B - As long as the user has an account with us
- Category D - As long as the user has an account with us
- Category F - As long as the user has an account with us
- Category G - As long as the user has an account with us
- Category H - As long as the user has an account with us
- Category I - As long as the user has an account with us
- Category J - As long as the user has an account with us
- Category K - As long as the user has an account with us

13.2. Sources of Personal Information

Learn more about the sources of personal information we collect in "WHAT INFORMATION DO WE COLLECT?"

13.3. How We Use and Share Personal Information

Learn more about how we use your personal information in the section, "HOW DO WE PROCESS YOUR INFORMATION?"

13.4. Will your information be shared with anyone else?

We may disclose your personal information with our service providers pursuant to a written contract between us and each service provider. Learn more about how we disclose personal information in the section, "WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?"

We may use your personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be "selling" of your personal information.

We have not disclosed, sold, or shared any personal information to third parties for a business or commercial purpose in the preceding twelve (12) months. We will not sell or share personal information in the future belonging to website visitors, users, and other consumers.

13.5. Your Rights

You have rights under certain US state data protection laws. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law. These rights include:

- Right to know whether or not we are processing your personal data

- Right to access your personal data
- Right to correct inaccuracies in your personal data
- Right to request the deletion of your personal data
- Right to obtain a copy of the personal data you previously shared with us
- Right to non-discrimination for exercising your rights
- Right to opt out of the processing of your personal data if it is used for targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects ("profiling")

Depending upon the state where you live, you may also have the following rights:

- Right to obtain a list of the categories of third parties to which we have disclosed personal data (as permitted by applicable law, including Delaware's privacy law)

13.6. How to Exercise Your Rights

To exercise these rights, you can contact us by submitting a data subject access request, by emailing us at benjamin@thepillar.app, or by referring to the contact details at the bottom of this document.

Under certain US state data protection laws, you can designate an authorized agent to make a request on your behalf. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with applicable laws.

13.7. Request Verification

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. We will only use personal information provided in your request to verify your identity or authority to make the request. However, if we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity and for security or fraud-prevention purposes.

If you submit the request through an authorized agent, we may need to collect additional information to verify your identity before processing your request and the agent will need to provide a written and signed permission from you to submit such request on your behalf.

13.8. Appeals

Under certain US state data protection laws, if we decline to take action regarding your request, you may appeal our decision by emailing us at benjamin@thepillar.app. We will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If your appeal is denied, you may submit a complaint to your state attorney general.

14. DO OTHER REGIONS HAVE SPECIFIC PRIVACY RIGHTS?

14.1. Australia and New Zealand

We collect and process your personal information under the obligations and conditions set by Australia's Privacy Act 1988 and New Zealand's Privacy Act 2020 (Privacy Act).

This Privacy Policy satisfies the notice requirements defined in both Privacy Acts, in particular: what personal information we collect from you, from which sources, for which purposes, and other recipients of your personal information.

If you do not wish to provide the personal information necessary to fulfill their applicable purpose, it may affect our ability to provide our services, in particular:

- offer you the products or services that you want
- respond to or help with your requests
- manage your account with us
- confirm your identity and protect your account

At any time, you have the right to request access to or correction of your personal information. You can make such a request by contacting us by using the contact details provided in the section "HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?"

If you believe we are unlawfully processing your personal information, you have the right to submit a complaint about a breach of the Australian Privacy Principles to the Office of the Australian Information Commissioner and a breach of New Zealand's Privacy Principles to the Office of New Zealand Privacy Commissioner.

14.2. Republic of South Africa

At any time, you have the right to request access to or correction of your personal information. You can make such a request by contacting us by using the contact details provided in the section "HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?"

If you are unsatisfied with the manner in which we address any complaint with regard to our processing of personal information, you can contact the office of the regulator, the details of which are:

The Information Regulator (South Africa)

General enquiries: enquiries@inforegulator.org.za

Complaints (complete POPIA/PAIA form 5): PAIAComplaints@inforegulator.org.za & POPIAComplaints@inforegulator.org.za

15. DO WE MAKE UPDATES TO THIS PRIVACY POLICY?

We reserve the right, in our sole discretion, to make changes or modifications to this Privacy Policy from time to time. The updated version will be indicated by an updated "Last updated" date at the top of this Privacy Policy and you waive any right to receive specific notice of such change. If we make material changes to this Privacy Policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. It is your responsibility to periodically review

this Privacy Policy frequently to be informed of how we are protecting your information and to stay informed of updates. You will be subject to, and will be deemed to have been made aware of and to have accepted, the changes in any revised Privacy Policy by your continued use of the Services after the date such revised Privacy Policy are posted.

16. HOW CAN YOU CONTACT US ABOUT THIS PRIVACY POLICY?

If you have questions or comments about this Privacy Policy, you may contact our Data Protection Officer (DPO) by email at benjamin@thepillar.app, by phone at 1-929-690-6020, or contact us by post at:

Boulevard Legacy LLC
Data Protection Officer
131 Continental Dr
Suite 305
Newark, DE 19713
United States

17. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country or state of residence in the US, you may have the right to request access to the personal information we collect from you, details about how we have processed it, correct inaccuracies, or delete your personal information. You may also have the right to request we limit the use or disclosure of your personal information or withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law. To request to review, update, or delete your personal information, please fill out and submit a data subject access request.

18. MISCELLANEOUS

This Privacy Policy and any policies and/or operating rules posted by us on the Services or in respect to the Services or otherwise constitutes the entire agreement between you and us concerning this subject matter and supersedes any prior version of this Privacy Policy and us.

Our failure to exercise or enforce any right or provision of this Privacy Policy shall not operate as a waiver of such right or provision. This Privacy Policy operates to the fullest extent permissible by law, rules and regulations. If any provision of this Privacy Policy is found by the arbitrator or (if proper) a court of competent jurisdiction to be invalid, the remaining provisions shall not be affected thereby and shall continue in full force and effect, and such provision may be modified or severed from this Privacy Policy to the extent necessary to make such provision enforceable and consistent with the remainder of this Privacy Policy. There is no joint venture, partnership, employment or agency relationship created between you and us as a result of this Privacy Policy or your use of the Services. You agree that this Privacy Policy shall be construed as if drafted jointly by the parties hereto and in the event an ambiguity or question of intent or interpretation arises, no presumption or burden of proof shall arise favoring or disfavoring any party by virtue of the authorship of any provisions of this Privacy Policy.