

## **BlueRobins Privacy Policy**

Effective Date: 06/01/2025

BlueRobins Inc (“BlueRobins”, “BlueRobins AI”, “we”, “us”, “our”) respects your privacy. This privacy notice (“Privacy Policy”) has been adopted on a company-wide basis to guide how we process the information that you provide to us through the BlueRobins website, our user portal accessible through [www.bluerobins.com](http://www.bluerobins.com), and services accessible through the user portal (collectively, the “Services”). Capitalized terms not otherwise defined herein have the meaning given such terms in our Terms of Agreement.

This Privacy Policy does not apply to apps, websites, products, or services provided by companies that we do not own or control or to individuals that we do not employ or manage.

This Privacy Policy does not apply to any personal information you share with your Mentor or your Client outside of the Services. You must use your own discretion when sharing personal information about yourself or anyone else with your Mentor or Client.

Protections provided for processing of personal information do not apply to information that does not relate to an identified or identifiable individual or to personal information or data rendered anonymous in such a manner that the individual is not or no longer identifiable, (“Anonymized Information”). We may process Anonymized Information for our own purposes in any manner and without attribution or compensation to any person.

We reserve the right to change, modify, add, or remove portions of this Privacy Policy. We will post notice of modifications to this Privacy Policy on this page and update the "Effective Date" at the top of this Privacy Policy. You must check this page periodically for changes. Changes will become effective immediately but will not apply retroactively. If you do not agree to the modified Privacy Policy you should immediately discontinue your use of the Services.

### **Lawful Basis for Processing**

Many jurisdictions require that we disclose to you the lawful basis for our processing of your personal information. We do that throughout this Privacy Policy. In general, our lawful basis for processing your personal information is based on your specific consent or your contract with us (i.e., our Terms of Agreement).

By accessing or using any of the Services or by otherwise interacting with us online, you consent to our processing of your personal information as described in this Privacy Policy. If our processing of your personal information is based on your consent, you may withdraw your consent at any time, and we will cease processing your personal information for that purpose. However, in some cases, this may result in your inability to receive partial or full access to the Services, and your withdrawal of consent does not limit our ability to process Anonymized Information for use by us in connection with our legitimate business efforts in the future. In addition, your withdrawal of consent does not prevent us from processing personal information if

we are required to do so by applicable law or to preserve legal claims. It also doesn't prevent us from processing personal information that is processed pursuant to a different lawful basis. For example, if you give your consent for us to process your personal information, but we are also required by law to keep your personal information, that separate "lawful basis" will still apply, even if you withdraw your consent.

When you enter into an agreement with us, either by accessing the Services, by executing an agreement in hard copy or by clicking "I Accept" or similar language online (such as agreeing to our Terms of Agreement), we will process your personal information for the purposes of fulfilling the terms of our contract with you. In that case, our processing of your personal information is based on the contract, so your withdrawal of consent will only be effective after the purposes for processing that personal information have been fulfilled and after we no longer have a legal obligation to keep that personal information, subject to applicable law.

In all cases, we will comply with applicable law and we will cease processing your personal information after the legal right, obligation, or other lawful basis expires.

### **Information We Process**

You do not need to proactively provide any personal information to view our website, but you will have to provide required personal information to fully use our Mentor and Client matching services and other features of the Service. You will not be able to fully utilize the Services if you choose not to provide personal information that is required for the Services.

**Information You Give to Us.** You may voluntarily give us certain personal information when you register for an account and use the Services.

As a **Client**, personal information that we **may** process from you includes:

- Name
- Photos (optional)
- Contact information (email, phone number, address)
- Education information (e.g., test scores, GPA, school(s) attended, schools applying to, areas of interest)
- Payment information (processed by us or our third-party payment processors)
- LinkedIn profile (optional)
- Location
- Account username & password
- Career information (e.g., companies worked for, roles, positions held, awards, other achievements) (optional)
- Additional information about your career, educational or other life background, goals, and plans that you choose to share.
- Other User Content (as defined in our Terms of Agreement, including content processed for recordings or Transcriptions of Mentoring sessions, with your consent where applicable).

As a **Mentor**, personal information that we **may** process from you includes:

- Name
- Photos
- Contact information (email, phone number, address)
- Education information (e.g., test scores, GPA, school(s) attended)
- Payment information (for receiving payouts, processed by us or our third-party payment processors)
- Location
- LinkedIn profile
- Account username & password
- Career information (e.g., companies worked for, roles, positions held, awards, other achievements)
- Video describing your background and services (optional)
- Additional information about your career, educational, or other life background, goals, and plans that you choose to share.
- Calendar and availability data for the purposes of scheduling with Clients.
- Other User Content (as defined in our Terms of Agreement, including content processed for recordings or Transcriptions of Mentoring sessions, with your consent where applicable).

**Information We Process Automatically.** Whenever you access or use the Services, we may automatically process information, some of which may constitute personal information, from your web browser or device, which may include: the device you use to access or use the Services, your IP address, operating system, browser type, platform types, preferences you submit and preferences that are generated based on the data you submit, links clicked, and number of clicks.

### **Why Process Your Personal Information**

We may process your personal information:

- to provide you the Services, including creating and managing your account;
- for the specific purpose for which that information was provided or collected;
- to evaluate your profile as a Mentor or Client;
- to facilitate matching you with a Mentor (if you are a Client) or with a Client (if you are a Mentor);
- to process payments and payouts;
- to address your customer service or technical support questions;
- to alert you of new products or services, features, or enhancements from BlueRobins, where permitted;
- to improve our Services, features, and user experience;
- to train, refine, or develop artificial intelligence models (as further detailed in our Terms of Agreement and subject to your rights and applicable law);
- for security purposes and to prevent fraud or abuse;

- to enforce our Terms of Agreement;
- as otherwise permitted by law; and/or
- for any other purpose with your consent.

## When We May Disclose Your Personal Information

We may transfer or disclose your personal information for the purposes described below:

- **With Mentors and Clients.** We share your personal information with Mentors if you're a Client and with Clients if you're a Mentor, as necessary to facilitate the Services (e.g., profile information for matching, contact information for scheduled sessions). This enables Mentors and Clients to work more effectively together.
- **With Your Consent.** We may transfer or disclose your personal information when we have your consent to do so. You can revoke your consent at any time, subject to legal or contractual restrictions, by providing notice to us at [support@bluerobins.com](mailto:support@bluerobins.com).
- **Service Providers.** We may employ other companies and people (our "Service Providers") to perform tasks on our behalf, and we may need to share your personal information with them to provide the Services to you or to support our business operations (e.g., payment processors, cloud hosting providers, data analytics providers, customer support tools, email service providers, AI transcription services). Unless we tell you differently, our Service Providers do not have any right to use your personal information beyond what is necessary to assist us and are typically under contractual obligations to protect your data.
- **Protection of BlueRobins's Business and Others.** We may also disclose your personal information at the request of law enforcement or government agencies, or in response to subpoenas, court orders, or other legal process, to establish, protect, or exercise our legal or other rights, to defend against a legal claim, or as otherwise required or allowed by law. We may disclose your personal information in order to protect the rights, property, or safety of a user, BlueRobins, or any other person. We may disclose your personal information to investigate or prevent a violation by you of any contractual or other relationship with us or your illegal or harmful activity.
- **Business Transfers.** In the event BlueRobins undergoes a business transaction such as a merger, acquisition by another company, or sale of all or a portion of our assets, your personal information may be among the assets transferred. You will be notified via email and/or a prominent notice on our Services of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.
- **Embedded Third-Party Services.** BlueRobins uses Google Meet to power our video platform (including to provide Transcriptions), Paypal to power our payment processing, Google mail & calendar to power our calendar syncing. Information, videos, recordings, or other personal information may be processed through these third-party services in order to provide Mentors and Clients a quality experience on the Services. Their use of your information will be governed by their own privacy policies.

## Cookies

We use cookies and similar tracking technologies (like web beacons and pixel tags) to operate and administer the Services, process usage data on the Services, and improve your experience on it. A "cookie" is a piece of information sent to your browser by a website you visit. Cookies can be stored on your computer for different periods of time. Some cookies expire after a certain amount of time, or upon logging out (session cookies), others survive after your browser is closed until a defined expiration date set in the cookie (as determined by the third party placing it), and help recognize your computer when you open your browser and browse the Internet again (persistent cookies).

We may use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help us analyze how users use the Services and enhance your experience when you use the Services. For more information on how Google uses this data, go to [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/).

We and our third-party service providers may use cookies or other tracking technologies to process information about your Browse activities over time and across different websites following your use of the Services and use that information to send targeted advertisements (where permitted and with your consent if required).

Please refer to your web browser's documentation or settings for information on how to receive a notification when you are receiving a new cookie and how to manage or disable cookies. Please note that if you limit the ability of websites to set cookies, you may be unable to access certain parts of the Services and you may not be able to benefit from the full functionality of the Services.

## **Marketing Communications**

You have the right at any time to prevent us from contacting you for marketing purposes. You can opt-out of promotional communications by following the unsubscribe instructions provided in each promotional email that we send to you. We may continue to send you administrative or service-related emails (e.g., updates to our Terms or Privacy Policy, information about your account, session confirmations) even if you opt-out of promotional emails, as these are necessary for your use of the Services.

## **Retention And Modification Of Your Personal Information**

We retain your personal information for as long as your account is active or as needed to provide you the Services and for a reasonable period thereafter to comply with our legal and contractual obligations, resolve disputes, and enforce our agreements, or as otherwise described in this Privacy Policy (e.g., for AI training purposes, subject to anonymization/aggregation where appropriate).

You can generally correct, update, or request removal of certain personal information by accessing and updating your account settings within the Service.

## **Links**

We may post links to third-party websites or services within the Services. We are not responsible or liable for any content, advertising, products, or other materials on or available from third-party websites or for any privacy or other practices of the third parties operating those websites. Your access and use of such third-party sites is solely at your own risk.

## **Your Rights Regarding Your Data**

Under applicable data privacy, protection, and other laws, you may have certain rights related to your access and control of your personal information. Such rights may include the following:

- The right to access, correct, update, or request deletion of your personal information.
- The right to object to processing or restrict the processing of your personal information. Please note that if you exercise this right, it may limit or eliminate our ability to provide you the Services.
- The right to request portability of your personal information.
- The right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you (known as Automatic Decision Making), unless certain exceptions apply.
- The right to submit a complaint to any applicable regulatory authority about our processing activities.
- The right to opt-out of us "selling" or "sharing" (as defined in applicable laws like the CPRA) your personal information, including for cross-context behavioral advertising or direct marketing purposes, subject to certain legal exceptions.
- The right to limit the use and disclosure of your sensitive personal information (as defined in applicable laws like the CPRA) to that which is necessary to perform the services or provide the goods reasonably expected.

We may use additional processes to verify your identity before we respond to your request or reveal or delete any of your personal information, including two-factor or two-step authentication measures where appropriate, to ensure we can identify you.

This list may not include all of your rights under applicable laws. If you believe you have additional rights, please contact us using the methods in this Privacy Policy.

Further, although we primarily process personal information with your consent or under contract, if we at any time in the future process personal information on a basis for which you can opt-out or withdraw consent, you may do so at any time, subject to the conditions described in the "Lawful Basis for Processing" section.

Please note that exercising any of the above rights may limit or eliminate our ability to provide you the Services. If so, we may need to terminate the Services or your account due to such requests.

We will try to comply with your request(s) as soon as reasonably practicable and in accordance with applicable law. Upon receipt of your written request, we will provide you with a copy of your information, although in certain limited circumstances we may not be able to make all relevant information available to you, such as where that information also pertains to another user or if it is subject to legal privilege. In such circumstances, we will provide reasons for the denial to you upon request, where permitted.

To exercise any of these rights, or if you have any questions about our processing of your personal information, please contact us at [support@bluerobins.com](mailto:support@bluerobins.com).

#### **A. Privacy for California Residents (CCPA/CPRA)**

California adopted the California Consumer Privacy Act ("CCPA"), which took effect in 2020, and the California Privacy Rights Act ("CPRA"), which fully took effect on January 1, 2023. We comply with the requirements of the CCPA and CPRA to the extent they apply to us. This section supplements the information contained elsewhere in this Privacy Policy and applies solely to California residents.

If you are a California resident, you have the rights detailed in the "Your Rights Regarding Your Data" section above, including the Right to Know/Access, Right to Delete, Right to Correct, and the Right to Limit Use of Sensitive Personal Information. You can exercise any of your rights free of discrimination.

To exercise your rights, please direct your questions to us at [support@bluerobins.com](mailto:support@bluerobins.com). We will verify your request using the information associated with your account or other information you provide.

#### **B. Privacy for Other Jurisdictions**

We strive to comply with all data protection and privacy laws in applicable jurisdictions, to the extent such laws apply to us and our Services. We aim to be transparent about our data processing activities and have disclosed our practices throughout this Privacy Policy. If you have any questions about your rights under any applicable data protection and privacy laws, please contact us at [support@bluerobins.com](mailto:support@bluerobins.com).

#### **How We Protect Your Personal Information**

We take reasonable administrative, technical, and physical security measures designed to maintain the security of your personal information and protect it from loss, misuse, unauthorized access, disclosure, alteration, or destruction. However, no data transmission over the Internet or method of electronic storage can be guaranteed to be completely secure. Accordingly, we cannot ensure or warrant the absolute security of any information that you transmit or provide to us, so you do so at your own risk. It is also important for you to protect against unauthorized access to your password and to your computer or mobile device.

**Do Not Track.** The Services currently do not respond to "Do Not Track" ("DNT") signals from web browsers. We will continue to evaluate potential responses to DNT signals in light of developing technology and industry standards.

### **Children's Privacy**

Our Services are not directed to children under the age of 13, and we do not knowingly collect or solicit personal information from children under 13. In accordance with our Terms of Agreement, users must be at least 13 years old to use the Service. If you are a child under 13, please do not attempt to register for the Services or send any personal information about yourself to us.

If we learn that we have inadvertently collected personal information from a child under 13 without verification of parental consent where required, we will take steps to delete that information as quickly as possible. If you are a parent or legal guardian and believe that your child under 13 has provided us with personal information without your consent, please contact us at [support@bluerobins.com](mailto:support@bluerobins.com).

### **Contact Us**

If you have any questions or would like further clarification about the Services, any of our products or services, or this Privacy Policy, or if you wish to exercise your privacy rights, please e-mail us at [support@bluerobins.com](mailto:support@bluerobins.com).