PRIVACY POLICY

This notice describes the privacy policy ("**Privacy Policy**" or "**Policy**") of <u>https://www.honestymeter.com/</u> (hereinafter referred to as the "**website**" or "**Site**" or "**Platform**") which is operated by: **Business Name:** HonestyMeter

Registered Office: 10685-B Hazelhurst Dr. # 35149 Houston, TX 77043 USA

(here simply referred to as **"HonestyMeter**" or **"us**" or **"our**" or **"we**"). In this Policy, you shall be referred as **"you**" or **"your**" or **"user**" or **"users**".

This **Privacy Policy** explains what information of yours will be collected by us when you access the website or our service; how the information will be used, and how you can control the collection, correction, and/or deletion of the information. We will not knowingly use or share your information with anyone, except as described in this Privacy Policy. The use of information collected by us shall be limited to the purposes described under this Privacy Policy and our Terms of Service.

By using our website, or providing your personal information to us, you are accepting and consenting to the practices described in this policy. Please note that this includes consenting to the processing of any personal information that you provide, as described below. Please take a moment to familiarize yourself with the details outlined below to understand our policies and practices concerning your privacy. If you have any questions or concerns, don't hesitate to contact us at <u>service@honestymeter.com</u>.

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1. What information about the users do we collect?

- a) User-Provided Information:
 - i. Text Content: We collect the text you submit for analysis and any comments you provide.
 - ii. Email Address: To sign up and log in, we require your email address.

iii. User Feedback: If you choose to provide feedback on our platform, it may be collected and used for system improvement.

b) Automatically Collected Information:

- **i. Anonymous Identifiers:** We use anonymous identifiers in cookies and/or local/session storage for tracking user interactions and detecting issues on the Website.
- **ii. Analytics Data:** We utilize analytics to understand user behavior anonymously, helping us maintain and improve the Website's performance and functionality.

c) Technical Information:

- i. **IP Address:** Your IP address may be logged for security and diagnostic purposes.
- **ii. Device and Browser Information**: We may collect information about the device and browser you use to access our website.
- d) **Customer Care:** If you contact our customer support via emails, in those cases, we collect all your interactions with our customer support.

2. What is the lawful basis for which we use your information?

For the purposes of applicable law, the Data Controller for the data that you submit to us is:

Business Name: HonestyMeter

Registered Office: 10685-B Hazelhurst Dr. # 35149 Houston, TX 77043 USA

At HonestyMeter, we process information based on the following lawful bases:

- a) **Contractual Necessity**: The processing of information is necessary for the performance of our contractual obligations, such as provision of our services.
- b) Consent: When you choose to register, sign up, or use our services, you provide consent for us to collect, process, and store your personal information, including text content and email addresses. You have the option to withdraw your consent at any time by discontinuing the use of our services.
- c) Legal Obligations: In certain cases, we may be legally obligated to collect and process your personal information to comply with applicable laws, regulations, or legal processes.
- d) Legitimate Interests: We may use your information to pursue our legitimate interests, such as enhancing and improving the performance and functionality of our website, as well as conducting anonymous analytics to understand user behavior and maintain the Website's quality.

In any case, we will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract. Feel free to contact us for this purpose at service@honestymeter.com.

3. How do we use this information?

At HonestyMeter, the information collected serves various purposes to enhance user experience and facilitate our services:

- a) Text Content Analysis: We analyze the text content you submit for bias detection and provide comprehensive reports.
- b) Feature Access: We use your information to enable access to features such as News Integrity Feed, Personal News Integrity Feed, Ratings, Custom Content Analysis, and the Honesty Badge.
- c) User Registration: Your data is utilized for user registration and authentication, allowing access to personalized features.
- d) User Feedback: User feedback, if provided, may be used to enhance the quality and accuracy of our evaluations.
- e) AI Algorithm Development: Your data is used for developing, testing, and improving our AI algorithms and technology for bias detection and analysis.
- **f**) **Account-Related Communication**: We communicate with users regarding account-related matters, including registration, login, and account recovery.
- g) User Inquiries: Your information may be used to respond to user inquiries, comments, and feedback.

- h) Service Updates: We provide information about updates, changes, or improvements to our services.
- User Behavior Analysis: We anonymously analyze user behavior on our website and gather usage statistics to understand user preferences and trends. This helps us enhance the performance and functionality of our services.
- **j**) **Legal Obligations:** We process your information to comply with applicable laws, regulations, and legal processes, including responding to legal requests and safeguarding our rights and interests.
- **k)** Website Security: We monitor and ensure the security of our website to protect against unauthorized access or activities.

4. Data Retention and Deleting your information

- a) Data Retention: Unless you request that we delete certain information, we will only retain your personal information for as long as is necessary to fulfill the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements, as well as ongoing fraud prevention, backup, and business continuity purposes.
- b) Deleting Personal Information: Your account and the information that you provide us is yours. You can at any time delete the same. However, you acknowledge that we may also retain some of the information so deleted for a reasonable period in order to comply with legal requests. You can request us to delete your information by writing to us at <u>service@honestymeter.com</u>.
- c) User Verification: Prior to processing deletion requests, we may need to verify the identity of the user to ensure the security of personal information.
- d) **Exceptions:** Certain information may be exempt from deletion if retention is necessary for legal compliance, dispute resolution, or other legitimate business purposes.
- e) Effect on Services: Deleting certain information may impact the user's ability to access and use specific services or features provided by HonestyMeter.
- f) Backup Copies: Information may continue to exist in backup copies for a limited period after deletion. These copies are retained for system restoration purposes and are not actively used.

5. Cookies and Similar Technologies

At HonestyMeter, we may use cookies and similar technologies to enhance your user experience and collect information about your interaction with our website. Cookies are small text files that are stored on your device when you visit a website. These technologies allow us to provide you with personalized content, remember your preferences, and analyze your usage of our services.

- a) Types of Cookies:
 - i. **Session Cookies**: These cookies are temporary and are deleted from your device once you close your browser. They are used to maintain your session and ensure a seamless experience while navigating our website.
 - ii. **Persistent Cookies**: Persistent cookies are stored on your device for a specified period. They help us remember your preferences and settings for future visits.
- b) Third-Party Cookies: We may also allow third-party service providers to place cookies on our website to assist with analytics, advertising, and other functionalities. These third parties may collect and use data from cookies for their own purposes, in accordance with their privacy policies.
- c) Cookie Management: You have the option to manage and control cookies through your browser settings. You can choose to block or delete cookies, which may impact certain features and functionality of our website.
- d) Analytics: We may use analytics tools that utilize cookies to collect information about your usage of our website. This data is used for understanding user behavior, trends, and preferences, helping us improve our services.

By continuing to use our website, you consent to the use of cookies and similar technologies as described in this Privacy Policy. If you choose to disable cookies, please be aware that some features of our website may not function as intended.

6. Sharing of Information

At HonestyMeter, transparency and user privacy are paramount. We may share collected information in specific circumstances outlined below:

- a) Our Employees: Information collected may be accessed by HonestyMeter employees based on their job responsibilities, such as customer support or system administrators. Access is restricted to those with a legitimate need for the information, and confidentiality obligations are in place.
- b) Third-Party Service Providers: We may share information with trusted third-party service providers who assist us in delivering and maintaining our services, including but not limited to hosting, data storage, analytics, and technical support. These providers are bound by confidentiality agreements and are prohibited from using your information for any purpose other than providing services to us.
- c) Legal Compliance and Protection: We may disclose your information when required by law, regulation, legal process, or governmental request. This includes responding to subpoenas, court orders, or other legal proceedings.
- d) **Protection of our Rights**: We may share your information to protect our rights, privacy, safety, or property, or that of our users, business partners, or the public, when we have a good faith belief that such action is necessary to prevent fraud, investigate potential violations, or address security issues.
- e) **Business Transfers**: In the event of a merger, acquisition, or sale of assets, user information may be transferred. Users will be notified of any such change in ownership or control of personal information.
- f) With User Consent: We may share your information with third parties if you provide explicit consent for such sharing.
- **g**) **Aggregate and Anonymized Data**: Aggregated and anonymized data may be shared for analytical purposes, providing insights into user trends and preferences without revealing personally identifiable information.

7. Storage and Security of Information

Ensuring the confidentiality and integrity of user information is a top priority at HonestyMeter. Here's how we handle the storage and security of the information we collect:

- a) Data Storage: Your information, including text content and user data, is stored on secure servers and databases hosted by reputable third-party providers. Our website is hosted on Vercel, and data is stored in MongoDB via <u>https://www.mongodb.com/</u>.
- b) Access Controls: Access to user information is restricted within HonestyMeter. Only employees with a legitimate need, such as customer support or system administrators, have access based on their job responsibilities.
- c) Employee Confidentiality: HonestyMeter employees are bound by confidentiality obligations and are trained on the secure handling of user information. This includes understanding the importance of maintaining the privacy and security of the data they may access.
- d) **Regular Security Audits**: HonestyMeter conducts regular security audits and assessments to identify and address potential vulnerabilities. This proactive approach helps maintain a robust security posture.
- e) Incident Response Plan: In the event of a data security incident, HonestyMeter has an incident response plan in place to promptly assess, contain, and mitigate the impact of the incident. Users will be notified as required by applicable data protection laws.
- f) Data Retention Policies: User information is retained only for as long as necessary to fulfill the purposes outlined in the Privacy Policy or as required by applicable laws and regulations. Once the retention period expires, data is securely deleted or anonymized.
- g) Security: We employ reasonable security practices to ensure that the information is safe and secure with us. However, no information on the internet is 100% safe, and you accept and acknowledge such risk. <u>Also, we</u> will disclose the information so collected for limited purposes as mentioned in this Privacy Policy.

8. Links to other Sites

The Site may contain links to third-party websites and online services that are not owned or controlled by us. We have no control over, and assume no responsibility for such websites and online services. Be aware when you leave the website; we suggest you read the terms and privacy policy of each third-party website, and online service that you visit.

9. Rights of Australian Users

HonestyMeter values the privacy and rights of our Australian users and is committed to ensuring compliance with the **Privacy Act 1988**. This section of our Privacy Policy outlines the rights and protections granted to Australian users under the Act.

- a) Access to Personal Information: Australian users have the right to request access to the personal information we hold about them. You may request details about the information collected, how it is used, and to whom it has been disclosed. To request access, please contact us at <u>service@honestymeter.com</u>.
- **b)** Correction of Personal Information: If you believe that the personal information, we hold about you is inaccurate, incomplete, or out of date, you have the right to request its correction. You can update your information by logging into your account or contacting us at the provided email address.
- c) Consent Withdrawal: If you provided consent for the collection, use, or disclosure of your personal information, you have the right to withdraw that consent at any time. However, withdrawing consent may impact your ability to use certain features of the platform.
- d) Complaints and Inquiries: If you have concerns about how your personal information is being handled or if you believe your privacy rights have been violated, you can lodge a complaint with the Office of the Australian Information Commissioner (OAIC). Additionally, you may contact us at service@honestymeter.com to address your inquiries and concerns.
- e) Anonymity and Pseudonymity: Australian users have the option to use a pseudonym or remain anonymous when interacting with our platform, provided that it is lawful and practical to do so. However, certain interactions may require accurate identification for contractual or legal reasons.
- f) Unsolicited Personal Information: If we receive unsolicited personal information that we did not request, we will take reasonable steps to determine whether it could have been collected lawfully. If not, we will delete or de-identify the information as appropriate.
- g) Cross-Border Data Transfers: HonestyMeter may transfer personal information to countries outside of Australia. We take measures to ensure that these transfers comply with Australian privacy laws and the safeguards outlined in this Privacy Policy.
- h) Privacy Complaints: If you have concerns about our compliance with the Privacy Act 1988 or the handling of your personal information, please contact us at <u>service@honestymeter.com</u>. We will respond promptly to address your inquiries and concerns.

We respect the rights and privacy of our Australian users and are committed to upholding the principles of the **Privacy Act 1988**. If you have any questions or wish to exercise your rights under the Act, please contact us using the provided email address.

10. Rights of EU, EEA, Switzerland, and UK users

This section of the Policy supplements the other provisions of this Privacy Policy, and applies to you if you are in the EU, the European Economic Area (EEA) or Switzerland or UK. For the purposes of GDPR, your **DATA CONTROLLER** for the data collected by us to provide you with our services is:

Business Name: HonestyMeter

Registered Office: 10685-B Hazelhurst Dr. # 35149 Houston, TX 77043 USA

ALL YOUR USER INFORMATION WILL BE COLLECTED, STORED, PROCESSED AND SHARED STRICTLY IN ACCORDANCE, IN LINE AND FULL COMPLIANCE WITH REGULATION (EU) 2016/679 (SIMPLY CALLED "GDPR"), DIRECTIVE 2002/58/EC (SIMPLY CALLED "E-PRIVACY DIRECTIVE, 2002") OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL, AND UK'S DATA PROTECTION ACT 2018 (HERINAFTER COLLECTIVELY REFERRED TO AS THE "UK GDPR").

Under applicable GDPR, you have the following rights in respect of your personal information:

• **Right to obtain information**: to obtain information about how and on what basis your personal information is processed and to obtain a copy;

- **Right to rectification:** You have the right to have any incomplete or inaccurate information we hold about you rectified and corrected.
- **Right of Erasure:** to erase your personal information in limited circumstances where (a) you believe that it is no longer necessary for us to hold your personal information; (b) we are processing your personal information on the basis of legitimate interests and you object to such processing, and we cannot demonstrate an overriding legitimate ground for the processing; (c) where you have provided your personal information to us with your consent and you wish to withdraw your consent and there is no other ground under which we can process your personal information; and (d) where you believe the personal information we hold about you is being unlawfully processed by us;
- **Right of restriction:** to restrict processing of your personal information where: (a) the accuracy of the personal information is contested; (b) the processing is unlawful but you object to the erasure of the personal information; (c) we no longer require the personal information for the purposes for which it was collected, but it is required for the establishment, exercise or defense of a legal claim or (d) you have objected to us processing your personal information based on our legitimate interests and we are considering your objection;
- **Right to object:** to object to decisions which are based solely on automated processing or profiling;
- **Right to ask for a copy:** where you have provided your personal information to us with your consent, to ask us for a copy of this data in a structured, machine-readable format and to ask us to share (port) this data to another data controller; or to obtain a copy of or access to safeguards under which your personal information is transferred outside of the UK or EEA.
- **Right to withdraw your consent.** You have the right to withdraw your consent on using your personal data. If you withdraw your consent, we may not be able to provide you with access to certain specific functionalities of our services.
- **Request the transfer of your Personal Data.** We will provide to you, or to a third-party you have chosen, your personal data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Under certain circumstances, you may have the right to object, on grounds relating to your particular situation, to the processing of your personal data by us and we may be required to no longer process your personal data. Moreover, if your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing. In this case your personal data will no longer be processed for such purposes by us.

In addition to the above, you have the right to lodge a complaint with a supervisory authority for data protection. Please note that the right of access and the right to erasure do not constitute absolute rights and the interests of other individuals may restrict your right of access or erase in accordance with local laws.

We will ask you for additional data to confirm your identity and for security purposes, before disclosing data requested by you. We reserve the right to charge a fee where permitted by law. We will decline to process requests that jeopardize the privacy of others, are extremely impractical, or would cause us to take any action that is not permissible under applicable laws. Additionally, as permitted by applicable laws, we will retain where necessary certain personal information for a limited period of time for record-keeping, accounting and fraud prevention purposes.

To make such requests, please contact us at service@honestymeter.com.

11. California Resident Rights

This privacy notice section for California residents supplements the information contained in our Privacy Policy and it applies solely to all visitors, users, and others who reside in the State of California.

"Shine the Light" and "Eraser" Laws: Residents of the State of California may request a list of all third parties to which we have disclosed certain information during the preceding year for those third parties' direct marketing purposes.

California Consumer Privacy Act (CCPA)/California Privacy Rights Act (CPRA): The CCPA, as amended by the CPRA, provides California residents and/or their authorized agents with specific rights regarding the collection and processing of their personal information.

Your Right to Know: California residents have the right to request that we disclose the following information to you about our collection and use of your personal information over the past twelve (12) months. We may ask you to provide certain information to identify yourself so that we may compare it with our records in order to verify your request. Upon verification, we will disclose to you:

- The categories of personal information we have collected about you.
- The categories of sources for the personal information we have collected about you.
- The specific pieces of personal information we have collected about you.
- Our business or commercial purpose for collecting or "selling" your personal information as defined by the CCPA.
- The categories of third parties to whom we have sold or shared your personal information, if any, and the categories of personal information that we have shared with each third-party recipient.

Your Right to Opt-Out of "Sale" or "Sharing" of Personal Information: California residents have the right to optout of the "sale" or "sharing" of their personal information as defined by the CCPA by contacting us at <u>service@honestymeter.com</u>.

Please note that we do not knowingly "sell" the personal information of any individuals.

If and where we are "sharing" your personal information with third parties for the purposes of cross-context behavioral advertising or profiling, you may opt-out of such sharing at any time by submitting a request at <u>service@honestymeter.com</u>.

Your Right to Limit Use of Sensitive Personal Information: California residents may have the right to request that businesses limit the use of any sensitive personal information to those uses which are necessary to perform the Services or for other specifically-enumerated business purposes under the CCPA, as amended by the CPRA. Please note that we do not use sensitive personal information other than as necessary to perform the Services or as specifically permitted under the CCPA.

Your Right to Delete: California residents have the right to request that we delete any of the personal information collected from you and retained by us, subject to certain exceptions. We may ask you to provide certain information to identify yourself so that we may compare it with our records in order to verify your request. Once your request is verified and we have determined that we are required to delete the requested personal information in accordance with the CCPA, we will delete, and direct our service providers to delete your personal information from their records. Your request to delete personal information that we have collected may be denied if we conclude it is necessary for us to retain such personal information under one or more of the exceptions listed in the CCPA.

Your Right to Correct: Under the CCPA, as amended by the CPRA, California residents have the right to request that we correct any inaccurate personal information we maintain about you, taking into account the nature of the personal information and the purposes for which we are processing such personal information. We will use commercially reasonable efforts to correct such inaccurate personal information about you.

Non-Discrimination: You will not receive any discriminatory treatment by us for the exercise of your privacy rights conferred by the CCPA.

To exercise any of your rights, please contact us at service@honestymeter.com

12. Notice for Nevada Residents

Under Nevada law, certain Nevada residents may opt out of the sale of "personally identifiable information" for monetary consideration to a person for that person to license or sell such information to additional persons.

"Personally identifiable information" includes first and last name, address, email address, phone number, social security number, or an identifier that allows a specific person to be contacted either physically or online.

Please note, we do not sell your personal information to anyone.

13. Rights of clients from other jurisdictions

Your data controller with respect to the personal information collected on the website is: Business Name: HonestyMeter Registered Office: 10685-B Hazelhurst Dr. # 35149 Houston, TX 77043 USA

Depending upon the laws of your jurisdiction, you may be eligible for some or all the following rights in respect of your personal information:

- **i. Right to obtain information**: You may have a right to obtain information about how and on what basis your personal information is processed and to obtain a copy.
- **ii. Right to rectification:** You may have the right to have any incomplete or inaccurate information we hold about you rectified and corrected.
- **iii. Right of Erasure:** You may have the right to erase your personal information in limited circumstances where (a) you believe that it is no longer necessary for us to hold your personal information; (b) we are processing your personal information on the basis of legitimate interests and you object to such processing, and we cannot demonstrate an overriding legitimate ground for the processing; (c) where you have provided your personal information to us with your consent and you wish to withdraw your consent and there is no other ground under which we can process your personal information; and (d) where you believe the personal information we hold about you is being unlawfully processed by us.
- **iv. Right of restriction:** You may have the right to restrict processing of your personal information where: (a) the accuracy of the personal information is contested; (b) the processing is unlawful but you object to the erasure of the personal information; (c) we no longer require the personal information for the purposes for which it was collected, but it is required for the establishment, exercise or defense of a legal claim or (d) you have objected to us processing your personal information based on our legitimate interests and we are considering your objection.
- v. **Right to object:** You may have the right to object to decisions which are based solely on automated processing or profiling.
- vi. Right to ask for a copy: Where you have provided your personal information to us with your consent, you may have the right to ask us for a copy of this data in a structured, machine-readable format and to ask us to share (port) this data to another data controller; or to obtain a copy of or access to safeguards under which your personal information is transferred outside of your jurisdiction.
- vii. Right to withdraw your consent. You may have the right to withdraw your consent on using your personal data. If you withdraw your consent, we may not be able to provide you with access to certain specific functionalities of our services.
- viii. Request the transfer of your Personal Data. If you so have this right, we will provide to you, or to a thirdparty you have chosen, your personal data in a structured, commonly used, machine-readable format. Please note that this right may only apply to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

To make such requests, please contact us at <u>service@honestymeter.com</u>. Please note, we reserve the right to reject the request if you are not entitled to the right that you request to enforce.

14. How do we respond to legal requests?

We may access, preserve, and share your information in response to a legal request (like a search warrant, court order or subpoena/summon) if we have a good faith belief that the law requires us to do so. This may include responding to legal requests from law enforcement agencies, courts, tribunals, and government authorities. We may also access, preserve and share information when we have a good faith belief it is necessary to: detect, prevent and address fraud and other illegal activity; to protect ourselves, you and others, including as part of investigations; or to prevent death or imminent bodily harm. We also may retain information from accounts disabled for violations of our terms for at least a year to prevent repeat abuse or other violations of our terms.

15. Children Privacy

Protecting children's privacy is important to us, and therefore our Site or our services are not intended for children. We do not direct the Site or our services to, nor do we knowingly collect any personal information from, such children. If you are not of majority (*or above*) as per the law of jurisdiction that applies to you, you are not authorized to use the website. If we learn that a child has provided personally identifiable information to us, we will use reasonable efforts to remove such information from our database. <u>Please contact us at service@honestymeter.com if you believe we knowingly or unknowingly collected information described in this Section.</u>

16. How can I withdraw my consent? (OPT-OUT)

If you sign up, you will automatically start receiving promotional emails and direct mail from us. If after you opt-in, you change your mind, you may withdraw your consent for us to contact you, for the continued collection, use or disclosure of your information, at any time, by contacting us at <u>service@honestymeter.com</u>.

17. Governing law and Dispute Resolution

Unless provided by the relevant statute, rules, or directives applicable to the jurisdiction in which you reside, in case of any disputes, issues, claims or controversies arising out of or in relation to your use of the Site or our services, the governing law and dispute resolution mechanism as provided in the **Terms of Service** shall apply to this **Privacy Policy** as well.

18. Do you have questions or concerns about this Privacy Policy?

In the event you have any grievance regarding anything related to this Privacy Policy, Terms of Service, or with any content or service of HonestyMeter, in that case you may freely write your concerns through your registered email to Grievance Officer/Designated Representative to below:

- Name: Grievance Officer
- Email: <u>service@honestymeter.com</u>

19. Updates to this Policy

We may add to or change or update this **Privacy Policy** at any time, from time to time, entirely at our own discretion, with or without any prior written notice. You are responsible for checking this Policy periodically. Your use of the Site/services after any amendments to this Policy shall constitute your acceptance to such amendments.

20. Welcoming of Suggestions

We welcome your comments regarding this Privacy Policy. Please write to us at service@honestymeter.com.

Last updated on January 23, 2023.