

## Ashler Privacy Notice

**Last Updated:** November 12, 2025

This Privacy Notice applies to the processing of personal information by Ashler AI LLC (“**Ashler**,” “**we**,” “**us**,” or “**our**”) including on our website available at <https://www.ashler.ai/> and our other online or offline offerings that link to, or are otherwise subject to, this Privacy Notice (collectively, the “**Services**”).

**Disclosure Regarding Customer Data.** This Privacy Notice does not apply to the personal information that we process solely on behalf of our customers as a “service provider” or a “processor” pursuant to a written agreement we have entered into with such customers (“**Customer Data**”). Our customers’ respective privacy notices or policies govern their collection and use of Customer Data. Our processing of Customer Data is governed by the contracts that we have in place with our customers, not this Privacy Notice. Any questions or requests relating to Customer Data should be directed to our customer.

1. **UPDATES TO THIS PRIVACY NOTICE**
2. **PERSONAL INFORMATION WE COLLECT**
3. **HOW WE USE PERSONAL INFORMATION**
4. **HOW WE SHARE PERSONAL INFORMATION**
5. **YOUR PRIVACY CHOICES AND RIGHTS**
6. **INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION**
7. **RETENTION OF PERSONAL INFORMATION**
8. **SUPPLEMENTAL NOTICE FOR EU/UK GDPR**
9. **CHILDREN’S PERSONAL INFORMATION**
10. **CONTACT US**

### 1. **UPDATES TO THIS PRIVACY NOTICE**

We may update this Privacy Notice from time to time at our sole discretion. If we do, we’ll let you know by posting the updated Privacy Notice on our website, and we may also send other communications.

### 2. **PERSONAL INFORMATION WE COLLECT**

We collect personal information that you provide to us, personal information we collect automatically when you use the Services, and personal information from third-party sources, as described below.

#### A. **Personal Information You Provide to Us Directly**

We may collect personal information that you provide to us.

- **Account Information.** We may collect personal information in connection with the creation or administration of your account. This personal information may include, but is not limited to, your name, email address, phone number, professional details, and other information you store with your account.
- **Transactions.** We may collect personal information and details associated with your transactions on the Services, including payment information. Any payments made via our Services are processed by third-party payment processors. We do not directly collect or store any payment card information entered through our Services, but we may receive information associated with your payment card information (e.g., your billing details).
- **Your Communications with Us.** We, and our service providers, may collect the information you communicate to us, such as through email or our web chat tool.

- **Surveys.** We may contact you to participate in surveys. If you decide to participate, we may collect personal information from you in connection with the surveys.
- **Interactive Features.** We and others who use our Services may collect personal information that you submit or make available through our interactive features (e.g., messaging features, commenting functionalities, forums, blogs, and social media pages). Any information you provide using the public sharing features of the Services will be considered “public.”
- **Conferences, Trade Shows, and Other Events.** We may collect personal information from individuals when we attend or host conferences, trade shows, and other events.
- **Business Development and Strategic Partnerships.** We may collect personal information from individuals and third parties to assess and pursue potential business opportunities.
- **Job Applications.** If you apply for a job with us, we will collect any personal information you provide in connection with your application, such as your contact information and resume or CV.

## B. Personal Information Collected Automatically

We may collect personal information automatically when you use the Services.

- **Device Information.** We may collect personal information about your device, such as your Internet protocol (IP) address, user settings, cookie identifiers, other unique identifiers, browser or device information, Internet service provider, and location information (including, as applicable, an approximate location derived from the IP address and precise geo-location information).
- **Usage Information.** We may collect personal information about your use of the Services, such as the pages that you visit, items that you search for, the types of content you interact with, information about the links you click, the frequency and duration of your activities, and other information about how you use the Services.
- **Cookie Notice (and Other Technologies).** We, as well as third parties, may use cookies, pixel tags, and other technologies (“**Technologies**”) to automatically collect personal information through your use of the Services.
  - **Cookies.** Cookies are small text files stored in device browsers.
  - **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded in the Services that collects personal information about use of or engagement with the Services. The use of a pixel tag allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. We may also include web beacons in emails to understand whether messages have been opened, acted on, or forwarded.

See [“Your Privacy Choices and Rights”](#) below to understand your choices regarding these Technologies.

## C. Personal Information Collected from Third Parties

We may collect personal information about you from third parties. For example, if you access the Services using a third-party website, application, service, products, or technology (each a “**Third-Party Service**”), we may collect personal information about you from that Third-Party Service that you have made available via your privacy settings. In addition, users of the Services may upload or otherwise provide personal information about others.

### **3. HOW WE USE PERSONAL INFORMATION**

We use personal information for a variety of business purposes, including to provide the Services, to improve the Services, to develop new products and services, and to provide you with marketing materials, as described below.

#### **A. Provide the Services**

We use personal information to provide the Services, such as:

- Providing access to certain areas, functionalities, and features of the Services;
- Communicating with you;
- Answering requests;
- Sharing personal information with third parties as needed to provide the Services; and
- Processing your financial information and other payment methods.

#### **B. Improve the Services and Develop New Products and Services**

We use personal information to improve the Services and to develop new products and services.

#### **C. Operate Our Business**

We use personal information to operate our business, such as:

- Pursuing our legitimate interests such as direct marketing, research and development (including marketing research), network and information security, and fraud prevention;
- Carrying out analytics;
- Creating de-identified and/or aggregated information;
- Processing applications if you apply for a job we post on our Services;
- Allowing you to register for events;
- Enforcing our agreements and policies; and
- Carrying out activities that are required to comply with our legal obligations.

#### **D. Marketing**

We may use personal information in connection with our marketing activities including to tailor and provide you with marketing communications, promotions, and offers that may interest you.

#### **E. With Your Consent or Direction**

We may use personal information: (i) for other purposes that are clearly disclosed to you at the time you provide the personal information, (ii) with your consent, or (iii) as otherwise directed by you.

#### **F. Automated Decision-Making**

We may engage in automated decision-making, including profiling.

### **4. HOW WE SHARE PERSONAL INFORMATION**

We share personal information with third parties for a variety of business purposes, including to provide the Services, to protect us or others, or in connection with a major business transaction such as a merger, sale, or asset transfer, as described below.

#### **A. Disclosures to Provide the Services**

We may share any of the personal information we collect with the categories of third parties described below.

- **Service Providers.** We may share personal information with service providers that assist us with the provision of the Services. This may include, but is not limited to, service providers that provide us with hosting services, customer service, AI or machine learning services, analytics, marketing services, IT support, and related services. In addition, personal information and chat communications may be shared with service providers that help provide our chat features.
- **Other Users You Share or Interact With.** The Services may allow Ashler users to share personal information or interact with other users of the Services.
- **Third-Party Services You Share or Interact With.** The Services may link to or allow you to interface with, interact with, share information with, direct us to share information with, access, and/or use a Third-Party Service.

Any personal information shared with a Third-Party Service will be subject to the Third-Party Service's privacy policy. We are not responsible for the processing of personal information by Third-Party Services.

- **Business Partners.** We may share your personal information with business partners we work with to provide you with a product or service you have requested. We may also share your personal information with business partners with whom we jointly offer products or services.

Once your personal information is shared with our business partner, it will also be subject to our business partner's privacy policy. We are not responsible for the processing of personal information by our business partners.

- **Ashler Customers (Authorized Users Only).** In cases where you use our Services as an employee, contractor, or other authorized user of a Ashler customer, we may share any information associated with your use of the Services with the Ashler customer, including, but not limited to, account information, usage information, files, and the contents of the communications associated with your account. Your personal information may also be subject to the Ashler customer's privacy policy. We are not responsible for the Ashler customer's processing of your personal information.
- **Affiliates.** We may share your personal information with our corporate affiliates.
- **Advertising Partners.** We may share your personal information with third-party advertising partners. These third-party advertising partners may set Technologies on our Services to collect personal information regarding your activities and your device (e.g., IP address, cookie identifiers, page(s) visited, location, time of day). These advertising partners may use this personal information (and similar information collected from other services) to tailor and deliver personalized ads to you when you visit digital properties within their networks. This practice is commonly referred to as "interest-based advertising," "personalized advertising," or "targeted advertising."

#### B. Disclosures to Protect Us or Others

We may share your personal information and related information with external parties if we, in good faith, believe doing so is required or appropriate to comply with law enforcement requests, national security requests, or other government requests; comply with legal process, such as a court order or subpoena; protect your, our, or others' rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual unauthorized or illegal activity.

#### C. Disclosure in the Event of Merger, Sale, or Other Asset Transfers

If we are involved in a merger, acquisition, financing, reorganization, bankruptcy, receivership, purchase or sale of assets, transition of service to another provider, or other similar corporate transaction, your personal information may be shared, sold, or transferred as part of such a transaction.

## 5. YOUR PRIVACY CHOICES AND RIGHTS

**Your Privacy Choices.** The privacy choices you may have about your personal information are described below.

- **Email Communications.** If you receive an unwanted email from us, you can use the unsubscribe functionality found at the bottom of the email to opt out of receiving future emails. Note that you will not be able to opt out of certain communications (e.g., communications regarding the Services or updates to this Privacy Notice).
- **Text Messages.** If you receive an unwanted text message from us, you may opt out of receiving future text messages from us by following the instructions in the text message you have received from us or by otherwise contacting us as set forth in [“Contact Us”](#) below.
- **“Do Not Track.”** Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.
- **Cookies.** You may stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as your browser or device permits. However, if you adjust your preferences, the Services may not work properly.

Please note that cookie-based opt-outs are not effective on mobile applications. However, you may opt out of certain tracking on some mobile applications by following the instructions for [Android](#), [iOS](#), and [other mobile operating systems](#).

The online advertising industry also provides mechanisms that may allow you to opt out of receiving targeted ads from organizations that participate in self-regulatory programs. To learn more, visit the [Network Advertising Initiative](#), [the Digital Advertising Alliance](#), and [the European Digital Advertising Alliance](#).

Please note you must separately opt out in each browser and on each device.

**Your Privacy Rights.** In accordance with applicable law, you may have the right to:

- **Request Access to or Portability of Your Personal Information;**
- **Request Correction of Your Personal Information;**
- **Request Deletion of Your Personal Information;**
- **Request Restriction of or Object to Our Processing of Your Personal Information;** and
- **Withdraw Your Consent to Our Processing of Your Personal Information.** Please note that your withdrawal will take effect only for future processing and will not affect the lawfulness of processing before the withdrawal.

If you would like to exercise any of these rights, please contact us as set forth in [“Contact Us”](#) below.

We will process such requests in accordance with applicable laws.

If your personal information is subject to the applicable data protection laws of the European Economic Area or the United Kingdom, you have the right to lodge a complaint with the competent supervisory authority if you believe that our processing of your personal information violates applicable law.

## 6. INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

All personal information processed by us may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States or other countries, which may have data protection laws that are different from the laws where you live. These countries may or may not have adequate data protection laws as defined by the data protection authority in your country.

If we transfer personal information from the European Economic Area, Switzerland, and/or the United Kingdom to a country that does not provide an adequate level of protection under applicable data protection laws, one of the safeguards we may use to support such transfer is the [EU Standard Contractual Clauses](#).

For more information about the safeguards we use for international transfers of your personal information, please contact us as set forth below.

## 7. RETENTION OF PERSONAL INFORMATION

We store the personal information we collect as described in this Privacy Notice for as long as you use the Services, or as long as necessary to fulfill the purpose(s) for which it was collected, or as long as necessary to pursue our business purposes.

To determine the appropriate retention period for personal information, we may consider applicable legal requirements; the amount, nature, and sensitivity of the personal information; certain risk factors; the purposes for which we process your personal information; and whether we can achieve those purposes through other means.

## 8. SUPPLEMENTAL NOTICE FOR EU/UK GDPR

This Supplemental Notice for EU/UK GDPR applies only to our processing of personal information that is subject to the EU or UK General Data Protection Regulation.

In some cases, providing personal information may be a requirement under applicable law, a contractual requirement, or a requirement necessary to enter into a contract. If you choose not to provide personal information in cases where it is required, we will inform you of the consequences at the time of your refusal to provide the personal information.

Ashler's processing of your personal information may be supported by one or more of the following lawful bases:

<u>Privacy Notice Section</u>	<u>Lawful Basis: Performance of a Contract (i.e., to provide the Services to you)</u>	<u>Lawful Basis: Legitimate Interest</u>	<u>Lawful Basis: Consent</u>	<u>Lawful Basis: For Compliance with Legal Obligations</u>
<b>Section 3A: Provide the Services</b>	✓	✓	✓	✓
<b>Section 3B: Improve the Services and Develop New</b>	✓	✓	✓	✓

<b>Products and Services</b>				
<b>Section 3C: Operate Our Business</b>	✓	✓	✓	✓
<b>Section 3D: Marketing</b>		✓	✓	
<b>Section 3E: With Your Consent or Direction</b>	✓	✓	✓	
<b>Section 3F: Automated Decision-Making</b>	✓	✓	✓	✓

## 9. CHILDREN’S PERSONAL INFORMATION

The Services are not directed to children under 16 (or other age as required by local law outside the United States), and we do not knowingly collect personal information from children.

If you are a parent or guardian and believe that your child has uploaded personal information to the Services in violation of applicable law, you may contact us as described in “[Contact Us](#)” below.

## 10. CONTACT US

Ashler is the controller of the personal information we process under this Privacy Notice.

If you have any questions about our privacy practices or this Privacy Notice, or to exercise your rights as detailed in this Privacy Notice, please contact us at: [support@ashler.ai](mailto:support@ashler.ai)