

# Podium Privacy Policy

**Effective: September 1, 2024**

This Privacy Policy describes how Podium Corporation, Inc. and its subsidiaries and affiliates (collectively, “Podium”, “we”, “us” and/or “our”) collects and manages your personal information - meaning information that relates to an identified or identifiable individual - as part of providing any services and products developed or administered by us, including without limitation our reputation management tools, messaging and communication tools, payment processing and related services, application programming interfaces, web and mobile applications, and any other services Podium may offer (collectively, the “Services”). Any capitalized terms used but not otherwise defined in this Privacy Policy have the meanings provided in Podium’s [Terms of Service](#).

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## 1. Scope

This Privacy Policy primarily covers:

- “Clients”: companies, organizations, or other entities that have contracted with Podium for the Services. Where this term is used in this Privacy Policy in the context of the processing of the personal information of a Client, it refers to a Client that is an individual.
- “Authorized Users”: employees, agents, contractors, and any other users (including but not limited to Developer Partners or Third-Party Providers) whom a Client has authorized to access the Services on its behalf.
- “Customers”: individuals who are current or potential clients, customers, or patients of a Client.

In addition to the above, this Privacy Policy applies to individuals who visit [www.podium.com](http://www.podium.com) (“Website”), which is part of the Services. In this Privacy Policy, “you” and “your” refers to you the reader, and how we process your personal information will depend on whether you are a Client, Authorized User, Customer, or Website visitor.

By using the Services or otherwise providing us with personal information, you acknowledge that your personal information will be processed and used in the manner set out in this Privacy Policy. We may amend this Privacy Policy from time to time in line with the [Changes to Our Privacy Policy](#) section below.

## 2. Personal Information We Collect

What personal information we collect depends on the nature of your interaction with the Services. While some personal information is collected automatically or through sources outside of Podium, most is collected when you use our Services. A breakdown of our collection practices is below. In all cases, the actual personal information we collect will vary depending on the Services used and your relationship with Podium.

## 2.1 Personal Information Collected Through the Services

### A. Information Provided by Clients and Authorized Users

If you are a Client or an Authorized User, we collect personal information from you in connection with your Subscription Documentation and use (or prospective use) of the Services, such as:

- name;
- address and other general location details;
- email;
- date of birth;
- phone number;
- information relating to your role, such as your job title;
- content of communications sent or received via the Services, such as text messages, message attachments, transcripts of calls made or received using the [Podium Phones Service](#) and voice recordings if a Client chooses to record calls. Clients are responsible for obtaining any required consent from call participants in order to record calls made or received via Podium.

As part of our registration process and agreement to provide the Services, we may also collect additional information, such as your employer identification number, federal tax identification number, and other business-related information. When you add payment information to your account, we use a third-party service provider to collect and store your payment information.

For Clients using Podium's Payments Service, in addition to the information listed above, Podium may also collect or receive a copy of your driver's license or other identification documentation, a self-selected photograph of you, information about your financial account and transaction history (such as a voided check or bank statement), Social Security number or other national identification number, and business and individual public records such as liens, judgments, and lawsuits. For more information, please see the [Podium Payments Service Terms](#).

### B. Information Provided by Customers

If you are a Customer, we collect information from you through your use of the Services, which may include your use of our Webchat widget, contact forms, review invitations, Payments Service, and other related products. We also collect your personal information when you communicate with a Client via text message, phone, email, social media, or otherwise, or make a purchase from or otherwise complete a transaction with a Client.

Depending on the Services you use, we may collect personal information such as your:

- name;
- contact details, such as your phone number and email;
- address and other general location details;
- transaction information (e.g., history of goods/services ordered, date, payment method, and amount of payment);
- health information, if you are a patient of a Client in the healthcare sector;
- reviews and feedback in relation to your experience with our Clients (if you choose to provide it); and
- content of communications sent or received via the Services, such as text messages, message attachments, transcripts of calls made or received using the [Podium Phones Service](#) and voice recordings if a Client chooses to record calls. Clients are responsible for obtaining any required consent from call participants in order to record calls made or received via Podium.

### C. Website Visitors

We may also collect personal information when you visit our Website to browse, request information about our Services, download a white paper, schedule a product demo, or you subscribe to our media channels (e.g., blogs, YouTube, etc.). This personal information may include your:

- name;
- email;
- phone number;
- business name;
- website; and
- job title.

If you request information about our Services using our Webchat product on our Website or you otherwise fill out a form on our Website, you agree to be bound by our [Messaging Terms and Conditions](#). Additionally, certain information may also be collected automatically when you visit our Website. For more information, see the [Information Collected Automatically](#) subsection below.

## D. Business Partners

If you are a business partner integrated with Podium or looking to do so, we collect information such as your name and contact details as part of your application to integrate with our Services.

# 2.2 Information Collected Automatically

We collect certain information automatically whenever anyone uses our Services - whether you are a Client, Authorized User, Customer, or Website visitor.

## A. Usage Information

We automatically collect details of your use of our Services, including traffic data, location data, logs, communication records (such as time of call or text message, call duration, call completion status, source number, and destination number) and other communication-related data, and the resources you access and use through the Services. We may also create inferred or derived data, such as a summary of information included in content processed by our artificial intelligence features.

## B. Widget Information

Other websites, such as our Clients' websites, may integrate Podium's widgets (such as Podium Webchat). When you visit a site with an embedded Podium widget, we receive certain information about you, including information about the web page you visited and other information about your device.

## C. Device Information

We receive information about the device and software you use to access our Services, such as your internet protocol (IP) address, web browser type, operating system version, phone carrier and manufacturer, application installations, device identifiers, mobile advertising identifiers, and push notification tokens.

## D. Information from Linked Accounts

If you choose to link our Services to a third-party account, we may receive information about you from that third party, including your profile information, photo, and use of that account. If you choose to link a Google account to our Services, Podium's use and transfer of information received from Google APIs to any other app will adhere to the [Google API Services User Data Policy](#). If you choose to link your Google email account to our Services, Podium may use information from the emails in your linked account to develop, train, and improve artificial intelligence and/or machine learning models personalized for you, and in doing so may transfer such information to third-party artificial intelligence tools. Please note that Podium does not use Google Workspace APIs to develop, improve, or train generalized/non-personalized artificial intelligence and/or machine learning models.

## E. Information from Cookies and Similar Technologies

The information we collect automatically by cookies, web beacons, and similar technologies may include:

- information about your device, such as your device type and model and device ID (e.g., MAC address);
- information about your browser, settings (e.g., language), and operating system;

- your IP address; and
- browsing and usage activity, such as the referring domain and what content you have viewed or actions you have taken on our Services.

See the [Cookies and Similar Technologies](#) section of this Privacy Policy for more information.

## F. Customer Proprietary Network Information (U.S.)

Customer proprietary network information (“CPNI”) is certain information that relates to a U.S. Client/Authorized User or Customer that Podium collects in the course of providing the Podium Phones Service, and includes information such as: phone numbers dialed and received by Clients; number of phone numbers assigned to an account; average length of calls; and call detail records and usage data. CPNI does not include basic contact information (such as name, phone number, and address).

Podium uses CPNI for the purposes described in this Privacy Policy other than for marketing purposes, and protects the confidentiality of CPNI as required by law. Podium personnel are not permitted to access, use, or share any CPNI unless they are authorized and have a legitimate business need to do so.

## 2.3 Personal Information Collected from Other Sources

Depending on whether you are a Client, Authorized User, Customer, or a Website visitor, we may also collect personal information about you from third parties including our marketing and service partners, identity verification and public record investigation services, and banks and other financial institutions. We may also collect information from you that is publicly available. For example, we may source information about a business from public search pages, or receive information about you if you interact with us or share your information through various social media channels.

## 2.4 Deidentified Information

We may at times receive or create de-identified information that can no longer reasonably be used to infer information about, or otherwise be linked to, a particular individual. We maintain and use such information in de-identified form and do not attempt to re-identify the information except as required or permitted by law.

## 3. How We Use Personal Information

We use your personal information to provide you and our Clients with our Services and to manage our business operations. This includes communicating with you as part of our Services, as well as use for advertising and marketing purposes and as otherwise permitted by law. The nature of how we use personal information will depend on the specific Services you use, and may vary depending on whether you are a Client, Authorized User, Customer, or Website visitor. A more detailed breakdown of how we use personal information is below.

### 3.1 Providing Our Services

We may use your personal information to:

- provide, maintain, improve, and enhance our Services and provide support and training related to our Services;
- determine eligibility to use certain Services;
- analyze the performance and assessing the effectiveness of our Services;
- creating and developing analytics for the benefit of our business and the businesses of our Clients;
- research purposes, including the development of new offerings; and
- to process transactions through the Services.

### 3.2 Advertising and Marketing

We may use your personal information to:

- send marketing communications regarding existing or new features of our Services that we think might interest you;
- display advertisements for Podium on social media and other third-party platforms;

- estimate our audience size and usage patterns; and
- enable our Clients to advertise their products and services to Customers.

Please see the [Your Rights and Choices](#) section of this Privacy Policy for details regarding your choices you have regarding marketing communications and targeted advertisements from us.

## 3.3 Communicating With You

We may use your personal information to communicate with you or provide information you have requested, such as:

- providing notifications in relation to the Services and other customer support;
- sending you white papers and other materials from our Website;
- providing you with our newsletters and other subscription materials;
- sending you digital receipts; and
- responding to feedback that you have provided in relation to our Services or, if you are a Customer, the products and services of our Clients.

## 3.4 Legal, Compliance, and Security

We may use your personal information for legal, compliance, and security-related purposes, including to:

- enforce our [Terms of Service](#) or other legal rights. Specifically, we monitor text message and other content to detect spam, fraudulent activity, and violations of our [Acceptable Use Policy](#);
- comply with our legal obligations, including under anti-money laundering, know-your-customer, and similar laws;
- detect, prevent, and investigate security incidents and otherwise secure and protect our network and systems;
- identify and protect against fraud and other crimes;
- establish, exercise, and defend legal claims; and
- perform our contractual obligations.

# 4. Disclosure of Your Personal Information

In certain instances, Podium may share the personal information it processes in order to provide our Services and for other purposes, as described in detail below.

## 4.1 Providing the Services

We may share personal information with our Clients and their Authorized Users to provide the Services, fulfill requests, and for other purposes as described in this Privacy Policy. If you are a Customer, as part of providing the Services (for example, when you use our Webchat widget on a Client website, complete a transaction through our Payments Service, or leave a review for a Client), Podium will share your personal information with the applicable Client, such as your contact information, transaction details, and review and communication content.

If a Client integrates Podium with other applications or platforms, we may share personal information with the third-party integration partners selected by the Client when Podium is instructed to share that information as part of the Services.

We may also share personal information with third parties to provide, maintain, and improve our Services, including service providers who may access information about you to perform services on our behalf or on behalf of our Clients, such as hosting and information technology services, payment processing services, identity verification and fraud prevention services, marketing and advertising services, data analytics and personalization services, and customer support services. The [Podium Service Partner page](#) contains a list of Podium's main service providers who process personal information on Podium's behalf, as may be updated from time to time.

Additionally, we may share personal information we receive with our subsidiaries and affiliates for any of the purposes described in this Privacy Policy. However, we do not share personal information we collect when you opt in to receive text messages from Podium on [www.podium.com](http://www.podium.com) or your consent with any third parties for their own purposes.

## 4.2 Legal, Compliance, and Security

We may share personal information if we believe it is necessary:

- to protect our rights or property, or the security or integrity of our Services;
- to enforce our [Terms of Service](#) or other applicable agreements or policies;
- to investigate, detect, and prevent fraud and security breaches, and protect us, users of our Services, and the public from harm or potentially prohibited activities;
- for public safety and in the provision of emergency services; and
- to comply with any applicable law, regulation, legal process, or governmental request (including, for example, a court order, subpoena, or search warrant).

## 4.3 Sale, Acquisition, Merger or Other Asset Transfers

We may share personal information with a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Podium's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Podium is among the assets transferred.

## 5. Cookies and Similar Technologies

Podium and third parties described below may use cookies, pixels, and other tracking technologies as part of providing the Services and for the purposes described in this Privacy Policy.

### 5.1 Tracking Technologies

A “cookie” is a small text file placed and saved in your browser when you access our Services and potentially the websites of our Clients, business partners, and other third parties. We use both session cookies (cookies that are stored only for a specific website visit) and persistent cookies (cookies that are stored beyond a specific website visit) to provide the Services and for the other purposes described in this Privacy Policy. These cookies may be set by us (first-party cookies) or by third parties that collect information on our behalf (third-party cookies), such as Google Analytics.

There are other tracking technologies, such as pixels, tags, and embedded scripts, that consist of small transparent image files or other web programming code that record how you interact with websites and mobile applications. They are often used in conjunction with cookies or other identifiers associated with your device.

### 5.2 How We Use These Technologies

Podium may use these technologies:

- to provide our Services (e.g., authentication within the check-out process);
- to uniquely identify you and/or your device;
- to store your preferences as part of providing the Services;
- for personalization and targeted advertising purposes;
- for security and fraud-prevention purposes;
- to analyze and monitor the performance of our Services;
- to improve and develop new Services; and
- to understand your use of the Services over time.

We use web analytics services such as Google Analytics to collect and process certain analytics data. We also use session replay services on our Services to understand and improve functionality and an individual's experience using Services. Certain web analytics services may collect information about your use of the Website and other websites, apps, and online resources. You can learn about Google's practices by going to <https://www.google.com/policies/privacy/partners/> and opt out of them by downloading the Google Analytics opt-out browser add-on, available at: <https://tools.google.com/dlpage/gaoptout>.

### 5.3 Your Choices

## A. Browser Settings

There are ways to control and/or reject the setting of cookies and similar technologies within your browser settings. As each browser is different, please consult the “help” menu within your browser. For additional information about cookies and how to control their use on various browsers and devices, you can visit <http://www.allaboutcookies.org>. Please be aware that depending on the Services being used, restricting cookies may prevent you from accessing and using all or part of the Services.

Do Not Track (“DNT”) is an optional browser setting that allows you to express your preferences regarding tracking across websites. Outside of the opt-out preference setting described below, we currently do not respond to DNT signals and we may continue to collect information in the manner described in this Privacy Policy from browsers that have enabled DNT or similar mechanisms.

## B. Targeted Advertising Choices

Podium does not “sell” personal information in the traditional sense. We do, however, provide personal information collected on and activity from the marketing pages of our Website to third parties for the purpose of displaying advertisements for Podium to you on other platforms (otherwise known as “targeted advertising” or “cross-context behavioral advertising”). Similarly, we allow certain third-party advertising partners to use cookies and other tracking technologies on our Services to collect information about you and your online activities for interest-based advertising or other targeted content. The information they collect may be associated with your personal information or they may collect information about your online activities over time and across different websites and other online services. This information may be shared with ad networks and other content providers.

Depending on your location, you may be able to opt out of such “sales” and “sharing” through our cookie management tool that can be accessed by clicking on the “Manage Preferences” or “Do Not Sell or Share My Personal Information” links at the bottom of our Website. Please note that your opt out will be specific to the device and browser you use when you opt out, and our Website will recognize opt-out preference settings only on domains of our Website where any “selling” or “sharing” occurs.

## 6. Retention

We retain personal information as long as reasonably necessary to provide the Services and for the other purposes set forth in this Privacy Policy. For example, we may retain information about users of our Services in order to comply with our legal and regulatory obligations or to protect our interests as part of providing the Services.

To determine the appropriate duration of the retention of personal information, we consider the amount, nature, and sensitivity of the personal information, and if we can attain our objectives by other means, as well as our legal, regulatory, tax, accounting, and other obligations. As to each type of personal information Podium collects, the retention period will vary depending on our relationship with the applicable individual. Generally, we retain a Client’s personal information - including personal information of their Authorized Users and Customers - for the duration of our agreement with the Client plus a reasonable period following termination.

## 7. Your Rights and Choices

We strive to provide you with choices regarding the personal information we process about you. Depending on the nature of your relationship with Podium, you may be able to manage your personal information and preferences directly as part of the Services or by contacting Podium, as described below.

### 7.1 Managing Information

Your ability to update and manage the personal information we process will differ depending on your relationship with Podium and what Services you use.

#### A. Clients and Authorized Users

We rely on you to ensure that the information in your account is accurate, complete, and up to date and ask that you notify us of any changes to your personal information. If you are a Client or Authorized User, you may access, change, or correct certain Podium account information at any time by logging into your account. You may also submit a request [here](#) or send us an email at [privacy@podium.com](mailto:privacy@podium.com) to request access to, correct, or delete any personal information that you have provided to us or we have collected in a data controller capacity. We may need to verify your identity before processing your request. In certain instances, we may not be able to accommodate your request due to legal, contractual, or technical restrictions. Please note that as we cannot delete all of your personal information except by also deleting your Podium account.

Clients wishing to delete or exercise other choices about the Customer data Podium processes on their behalf in a service provider/processor capacity may do so by submitting a request [here](#) or sending us an email at [privacy@podium.com](mailto:privacy@podium.com). In some cases, we may retain a copy of your usage records, including the personal information contained in them, to carry out necessary functions like billing, troubleshooting, and detecting, preventing, and investigating spam, fraudulent activity, and network exploits

and abuse. We may also be required to preserve Client records, including those containing personal information, due to litigation, law enforcement requests, or government investigations. If we have to do this, we will delete the impacted records when we are no longer legally obligated to retain them. We may, however, retain or use records after they have been de-identified, if permitted by law.

## B. Customers

When we provide our Services to our Clients and their Authorized Users, we generally act as data processor or service provider on their behalf. This means that when we receive and otherwise process information pertaining to Customers as part of providing the Services, such as Customer names, contact information, text messages, call records, etc., we do so on behalf of our Clients and in accordance with their instructions. As such, if you wish to access, modify, or delete any personal information or the content of communications Podium processes as a service provider or data processor on behalf of a Client, you should direct your request to that Client rather than to Podium.

In other instances, if applicable, contact us as described in the [Contact Us](#) section of this Privacy Policy.

If you submit a request to update, delete, or otherwise manage your personal information, we will try to help you with your request free of charge. However, we may request that you pay a reasonable fee, such as if you request a transcript or a reproduction by mail. We will only do so if we are authorized by law, and if we notified you before and you've accepted the fees. To avoid any fraudulent request and protect your personal information, we may ask that you provide a proof of identity with your request. We will not use such personal information for any other purposes.

We will respond to your request as soon as reasonably practicable, and within the time period required by law. Please note that in certain circumstances, we may refuse to act or impose limitations on your rights, as permitted by the applicable law. If we cannot process your request, we may inform you of the reasons why, subject to any legal or regulatory restrictions, and outline further steps available to you.

In certain cases, depending on the nature of your request, there may also be residual information that will remain within our databases and other records, which, due to applicable law or as part of Services that are in the process of being carried out, will not be removed or changed. We will also retain information relating to your request for recordkeeping and compliance purposes.

## 7.2 Podium Communications

As part of providing the Services, Podium (whether directly or through a third party) may send you different types of communications.

### A. Marketing Communications

Podium may send you marketing and other promotional communications for new or existing Services that we think you might be interested in. These communications may include promotional emails, and marketing text messages if you have opted in to receive them. You may unsubscribe from Podium's promotional emails via the unsubscribe link provided in such emails. To stop receiving marketing text messages from Podium, text "REMOVE" in response to any Podium marketing text message you receive. If you unsubscribe from Podium marketing text messages and wish to resubscribe, reply "JOIN." For more information about text messages Podium sends on its own behalf, see our [SMS Terms and Conditions](#).

Please note that you may still receive certain non-marketing communications from Podium after opting out as set forth above. These messages may include transaction-specific or account-specific communications.

If you are a Customer, our Clients may also send you marketing and promotional communications as part of their use of the Services. In these instances, please follow the instructions within those messages to opt out or reach out to the Client directly.

### B. Other Communications

As part of your interaction with our Services, you may receive various non-marketing communications from Podium via email, text message, or telephone. These include, but are not limited to:

For Clients and Authorized Users:

- communications relating to Podium's Services and demo requests (for prospective Clients);
- onboarding-related communications pertaining to setting up the Services; and/or
- communications pertaining to Services that you are using or are under your account.

For Customers:

- communications by Clients through the Services, such as appointment reminders, order statuses, payment and review requests, and other business related communications; and/or

- responding to feedback that you have provided in relation to the Services of Podium or one of our Clients.

## 7.3 Cookies and Similar Technologies

For information about your choices regarding Podium's use of cookies and other similar technologies, see the [Cookies and Similar Technologies](#) section of this Privacy Policy.

## 8. Security

We have implemented reasonable security measures that are designed to protect the information we maintain. These measures vary based on the sensitivity of the information we collect and process. However, we cannot guarantee that the collection, transmission, and storage of personal information will always be completely secure.

Where we have given you (or you have chosen) a password for access to certain features of our Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. Podium strongly recommends Clients enable [multi-factor authentication](#).

## 9. Client Practices and Links to Other Sites

This Privacy Policy only applies to information Podium processes when you visit our Website or otherwise use our Services. Podium's Clients are independent third parties that maintain their own business practices and policies outside of their relationship with Podium and their use of the Services. As a result, we are not responsible for the privacy policies or data practices of our Clients.

Moreover, while visiting our Website or using the Services, you may be directed through links to third-party websites or services that are not operated or controlled by Podium. We are not responsible for the privacy practices and policies of these third parties, and we encourage you to review the privacy policies of these third parties, as their practices may differ from ours.

## 10. Children

Our Services are not targeted to or directed at children under the age of 13, and we do not intend to, or knowingly, collect or solicit personal information from children under the age of 13. If you have reason to believe a child under the age of 13 has provided personal information to us, we encourage the child's parent or guardian to contact us as described in the [Contact Us](#) section of this Privacy Policy to request that we remove the information from our systems.

## 11. Data Transfers

Our Services are primarily hosted in the United States. If you choose to use the Services from other regions of the world with laws governing data processing that differ from those in the United States, please note that you are transferring your personal information outside of those regions to the United States for processing. Additionally, Podium (or our service providers on our behalf) may transfer your data from the United States to other regions in connection with our processing of data. We utilize appropriate safeguards for the transfer of personal information in various jurisdictions, and have implemented contractual arrangements or other measures for such purposes.

Your provision of personal information to us via the Services constitutes your consent to the transfer and processing of your personal information as described in this Privacy Policy.

## 12. Location-Specific Disclosures

### 12.1 Australia

If you are an Australian user accessing or using the Services from Australia, the Privacy Act 1988 (Cth) and the Australian Privacy Principles contained therein apply to personal information collected or held by Podium entities with an "Australian link" (within the meaning of the Privacy Act). In addition, Podium is committed to complying with other applicable commonwealth, state, or territory privacy and data protection laws and regulations.

### 12.2 California

The table below provides a summary of certain categories of personal information Podium collects, the sources of that personal information, and how we use and disclose that personal information, as required by the California Consumer Privacy Act of 2018, as amended ("CCPA"). For more information, please see the generally applicable sections of our Privacy Policy above.

<b>Category of Personal Information</b>	<b>Examples*</b>	<b>Categories of Sources</b>  <i>For additional details regarding how we may obtain personal information, see the <a href="#">Personal Information We Collect</a> section of this Privacy Policy.</i>	<b>Commercial/Business Purposes</b>  <i>For additional details regarding how we may use personal information we collect, see the <a href="#">How We Use Personal Information</a> section of this Privacy Policy.</i>	<b>With Whom it is Shared</b>  <i>For additional details regarding how we may share personal information, see the <a href="#">Disclosure of Your Personal Information</a> section of this Privacy Policy.</i>
Identifiers	Name, address, IP address, email address	<ul style="list-style-type: none"> <li>• You or your devices, for example, through your use of our Services</li> <li>• Business partners</li> <li>• Service providers</li> <li>• Clients and Authorized Users</li> </ul>	<ul style="list-style-type: none"> <li>• Provide, maintain, and support our Services</li> <li>• Manage our business and for internal operations</li> <li>• Advertise and market to you</li> <li>• Communicate with you</li> <li>• Legal, compliance, and security-related purposes</li> </ul>	<ul style="list-style-type: none"> <li>• Clients and Authorized Users</li> <li>• Business partners, including advertising partners and ad networks</li> <li>• Service providers</li> <li>• Legal and other regulatory authorities</li> </ul>
California Customer Records (Cal. Civ. Code § 1798.80(e))	Name, telephone number	<ul style="list-style-type: none"> <li>• You or your devices, for example, through your use of our Services</li> <li>• Business partners</li> <li>• Service providers</li> <li>• Clients and Authorized Users</li> </ul>	<ul style="list-style-type: none"> <li>• Provide, maintain, and support our Services</li> <li>• Manage our business and for internal operations</li> <li>• Advertise and market to you</li> <li>• Communicate with you</li> <li>• Legal, compliance, and security-related purposes</li> </ul>	<ul style="list-style-type: none"> <li>• Clients and Authorized Users</li> <li>• Business partners, including advertising partners and ad networks</li> <li>• Service providers</li> <li>• Legal and other regulatory authorities</li> </ul>
Internet/Network Information	Website browsing activity and interactions, advertisement interactions	<ul style="list-style-type: none"> <li>• You or your devices, for example, through your use of our Services</li> <li>• Service providers</li> </ul>	<ul style="list-style-type: none"> <li>• Provide, maintain, and support our Services</li> <li>• Manage our business and for internal operations</li> <li>• Advertise and market to you</li> <li>• Communicate with you</li> <li>• Legal, compliance, and security-related purposes</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers</li> <li>• Business partners, including advertising partners and ad networks</li> <li>• Legal and other regulatory authorities</li> </ul>
Geolocation Data	Course location information based on your device activity	<ul style="list-style-type: none"> <li>• You or your devices, for example, through your use of our Services</li> <li>• Service providers</li> </ul>	<ul style="list-style-type: none"> <li>• Provide, maintain, and support our Services</li> <li>• Advertise and market to you</li> <li>• Legal, compliance, and security-related purposes</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers</li> <li>• Business partners, including advertising partners and ad networks</li> <li>• Legal and other regulatory authorities</li> </ul>

Sensory Information	Call recordings, transcripts, and other audio, electronic, and similar information	<ul style="list-style-type: none"> <li>You or your devices, for example, through your use of our Services</li> <li>Service providers</li> </ul>	<ul style="list-style-type: none"> <li>Provide, maintain, and support our Services</li> <li>Manage our business and for internal operations</li> <li>Legal, compliance, and security-related purposes</li> </ul>	<ul style="list-style-type: none"> <li>Clients and Authorized Users</li> <li>Service Providers</li> <li>Legal and other regulatory authorities</li> </ul>
Professional or Employment Information	Job title, professional website, job application information	You, for example, if you fill out a form on our Website, create a Podium account, or apply for a role at Podium	<ul style="list-style-type: none"> <li>Provide, maintain, and support our Services</li> <li>Manage our business and for internal operations</li> <li>Legal, compliance, and security-related purposes</li> </ul>	<ul style="list-style-type: none"> <li>Service providers</li> <li>Business partners</li> <li>Legal and other regulatory authorities</li> </ul>
Inferences	Inferences drawn from any of the above categories of personal information (e.g., preferences or characteristics)	<ul style="list-style-type: none"> <li>You or your devices, for example, through your use of our Services</li> <li>Clients and Authorized Users</li> </ul>	<ul style="list-style-type: none"> <li>Provide, maintain, and support our Services</li> <li>Manage our business and for internal operations</li> <li>Advertise and market to you</li> <li>Legal, compliance, and security-related purposes</li> </ul>	<ul style="list-style-type: none"> <li>Clients and Authorized Users</li> <li>Business partners</li> <li>Service providers</li> <li>Legal and other regulatory authorities</li> </ul>
<b>Sensitive Information</b>  <i>Podium does not "sell" or "share" sensitive personal information, or otherwise use or disclose sensitive personal information for purposes other than those specified in § 1798.121(a) of the CCPA.</i>	Social Security Number	You, for example, if you sign up for the Podium Payments Service	<ul style="list-style-type: none"> <li>Provide, maintain, and support our Services</li> <li>Legal, compliance, and security-related purposes</li> </ul>	<ul style="list-style-type: none"> <li>Service providers</li> <li>Legal and other regulatory authorities</li> </ul>
	Driver's License or State ID Number	You, for example, if you sign up for the Podium Payments Service	<ul style="list-style-type: none"> <li>Provide, maintain, and support our Services</li> <li>Legal, compliance, and security-related purposes</li> </ul>	<ul style="list-style-type: none"> <li>Service providers</li> <li>Legal and other regulatory authorities</li> </ul>
	Account Login and Password	You, if you create a Podium account	<ul style="list-style-type: none"> <li>Provide, maintain, and support our Services</li> <li>Legal, compliance, and security-related purposes</li> </ul>	<ul style="list-style-type: none"> <li>Service providers</li> <li>Legal and other regulatory authorities</li> </ul>
	Health Data	You, if you provide such information to a Client via the Services	<ul style="list-style-type: none"> <li>Provide, maintain, and support our Services</li> <li>Legal, compliance, and security-related purposes</li> </ul>	<ul style="list-style-type: none"> <li>Service providers</li> <li>Legal and other regulatory authorities</li> </ul>

*\*Note that the actual personal information collected will depend on the nature of an individual's relationship with Podium and the specific Services provided.*

If you are a California resident, you may exercise your rights under the CCPA to have personal information Podium collects about you in a data controller/business capacity by following the instructions in the [Your Rights and Choices](#) section of this Privacy Policy.

## 12.3 Canada

If you are located in Canada, subject to applicable law and the nature of your relationship with Podium, you may have the right to review, correct, delete, or otherwise limit our use of your personal information that has been previously provided to us. You may also have the right to access information about the ways in which your personal information is or has been used and the names of individuals and/or organizations to which your information has been disclosed. You may exercise such rights by following the instructions in the [Your Rights and Choices](#) section of this Privacy Policy.

The Office of the Privacy Commissioner of Canada drafted [this FAQ](#) to help you access your personal information when it is held by a business. You can also contact the Office of the Privacy Commissioner of Canada's Information Centre at 1-800-282-1376 or by mail at: Office of the Privacy Commissioner, 30 Victoria Street, Gatineau, Québec K1A 1H3.

If you have any issue with how we process your personal information, or how we responded to your request, please let us know. We will try to improve our processes and provide you with additional information about our practices if you would like us to do so. If you are still not satisfied, you can lodge a complaint to the Office of the Privacy Commissioner of Canada using [this online form](#), or to your local privacy regulators.

## 13. Changes to Our Privacy Policy

Podium will post any changes we make to our Privacy Policy on this page. The date the Privacy Policy was last revised is identified at the top of this page. If we make material changes to how we process personal information, we will notify Clients and Authorized Users by email to the primary email addresses specified in their accounts. If you are a Client or Authorized User, you are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Services and this Privacy Policy to check for any changes.

## 14. Contact Us

If you have questions about our Privacy Policy, our data processing practices, or our compliance with applicable privacy laws, please email us at [privacy@podium.com](mailto:privacy@podium.com), write to us at: Podium Corporation, Inc., Attn: Legal Department, 1650 W Digital Drive, Lehi, UT 84043, or call us via our toll-free number 1-833-276-3486.

In the event you are a user with a disability, or are supporting an individual with a disability, and are having difficulty navigating this Privacy Policy or the information linked within this Privacy Policy, please contact us at [privacy@podium.com](mailto:privacy@podium.com).