DocuGen Privacy Policy

This Privacy Policy describes how we - DocuGen, Inc. (together with its affiliates companies - "DocuGen", "we", "our" or "us") collect, store, use and disclose personal data regarding individuals ("you") who: (i) visit or otherwise interact with our websites ("Visitors"), available at docugen.io or any other website, webpage, e-mail, text message or online ad under our control (collectively - "Sites"); (ii) use our document generation platform (the "Users"; and together with the Sites - the "Service")

Your privacy is important to us, and we are strongly committed to making our practices regarding your personal data more transparent and fairer. Please read this Privacy Policy carefully and make sure that you fully understand and agree to it.

You are not legally required to provide us with any Personal Data (defined below), and may do so (or avoid doing so) at your own free will.

If you do not wish to provide us with such Personal Data, or to have it processed by us or any of our Service Providers (defined below), please simply do not enter our Sites or use our Service. You may also choose not to provide us with "optional" Personal Data, but please keep in mind that without it we may not be able to provide you with the full range of our services or with the best user experience when using our Service.

This Privacy Policy forms part of our Terms of Service ("Terms"). Any capitalized but undefined term in this Privacy Policy shall have the meaning given to it in the Terms.

1. Data Collection

We collect technical data, profile data, customer data, content, and other data received from you, your organization or other third party sources.

We collect various types of personal data regarding our Users as well as data regarding Visitors to our Sites. Such data is typically collected and generated through your interaction with us or our Service, through automatic means, or directly from you, from other Users, from our Customers, or from other third parties (including Service Providers, as hereinafter defined).

Specifically, we collect the following categories of data (which, to the extent it relates to an identified or identifiable individual, is deemed as "Personal Data"):

Data automatically collected or generated: When you visit, interact with, or use our Service, we may collect, record or generate certain technical data about you. We do so either independently or with the help of third party Service Providers (as defined in Section 4 below), including through the use of "cookies" and other tracking technologies (as detailed in Section 5 below).

Such data consists of connectivity, technical and aggregated usage data, such as IP addresses

and general locations, device data (like type, operating system, mobile device id, browser version, locale and language settings used), date and time stamps of usage, the cookies and pixels installed or utilized on such device and the recorded activity (sessions, clicks and other interactions) of Visitors and Users in connection with our Service. In addition, phone calls (e.g. with our customer success or product consultants) may be automatically recorded, tracked and analyzed, for purposes including analytics, service-, operations-, and business quality control and improvements, and record-keeping purposes.

User Data received from you: When you contact us or sign up to the Service and create your individual profile ("User Profile"), you may provide us with Personal Data. This includes your name, workplace and position, contact details (such as e-mail, phone and address), account login details (e-mail address and passwords which are automatically hashed), as well as any other data you choose to provide when you use our Service, contact us, or interact with others via our Service. For example, you may connect your Google account when you sign up or login to the Service, and thereby provide us with your name, e-mail address, image and other details listed on your profile there. You may also provide us with your profile photo, location, time-zone, skills, device, general location, and activity logs and data; as well as your preferences, characteristics and objectives for using the Service (collectively, "User Data").

You may also send us a "Contact Us" or support requests, or provide us with feedback, reviews, or answers to surveys or promotions, including by submitting an online form on our Service or social media channels, by posting on any of our online public forums or communities, by sending an e-mail to any of our designated addresses, or any other form of communication. Such data may include details on a problem you are experiencing, contact information and any other documentation, screen recording, screenshots or other information.

Our Customers may provide us with additional User Data such as their billing details, business needs and preferences. To the extent that such data concerns a non-human entity (e.g. the bank account of a company or business), we will not regard it as "Personal Data" and this Privacy Policy will not apply to it.

Customer Data containing Personal Data: Users may choose to upload or submit Customer Data to our Service which includes Personal Data (e.g., by uploading the Customer's clients or employees directories). Personal Data which is included in Customer Data will only be processed by DocuGen on behalf of our Customer (who owns the Customer's Account), in accordance with our Data Processing Agreement (to the extent applicable) and other agreements with such Customer, and this Privacy Policy.

User Data received from our Customers and Users: Customers and Users may provide us with the contact details of their employees, team members and colleagues, in order for us to contact, invite or subscribe them as Users to our Service. Such data typically includes these individuals' names, phone numbers and work e-mails, however additional data may be provided at the discretion of those providing it. For the purposes of this Privacy Policy, this data will also be regarded as "User Data".

Data received from other third parties: We may receive Personal Data concerning you from other sources. For example, if you participate in an event, webinar or promotion that we sponsor or participate in, we may receive your Personal Data from its organizers. We may also receive your contact and professional details (e.g., your name, company, position, contact details and professional experience, preferences and interests) from our business partners or service providers, and through the use of tools and channels commonly used for connecting between companies and individuals in order to explore potential business and employment opportunities, such as LinkedIn.

Data concerning service integrations: If, when using the Service, you or your Admin choose to integrate the Customer's Account on a third-party service (and such service is supported by our Service), we will connect and integrate that third-party service to ours. The third-party provider of this integration may receive certain relevant data about or from your Customer's Account (including User Data), or share certain relevant data from your Customer's Account on their service with our Service, depending on the nature and purpose of such integration. Note that we do not receive or store your passwords for any of these third-party services (but do typically require your API key in order to integrate with them). If you do not wish your data to be shared with such third-party service(s), please contact your Admin.

Data obtained through Analytics Tools: We use analytics tools (e.g. Google Analytics) to collect data about the use of our Sites and Service. Analytics tools collect data such as how often Users and Visitors visit or use the Sites or Service, which pages they visit and when, and which website, ad or e-mail message brought them there.

2. Data Uses

We use Personal Data to provide, improve and secure our Service; for analytics, marketing and sales purposes; to comply with applicable laws; and to support our legitimate interests.

We use Personal Data as necessary for the performance of our Service; to comply with our legal and contractual obligations; and to support our legitimate interests in maintaining and improving our Service, e.g. in understanding how our Service are used and how our campaigns are performing, and gaining insights which help us dedicate our resources and efforts more efficiently; in marketing, advertising and selling our Service to you and others; providing customer service and technical support; and protecting and securing our Users, Customers, Visitors, ourselves and our Service.

If you reside or are using the Service (i) in a territory governed by privacy laws which determine that "consent" is the only or most appropriate legal basis for processing Personal Data (in general, or specifically with respect to the types of Personal Data you choose to share via the Service), your acceptance of our Terms and of this Privacy Policy will be deemed as your consent to the processing of your Personal Data for all purposes detailed in this Privacy Policy. If you wish to revoke such consent, please contact us by email at legal@docugen.io.

We do not sell your personal information for the intents and purposes of the California Consumer Privacy Act (CCPA).

Specifically, we use Personal Data for the following purposes:

• To facilitate, operate, and provide our Service;

• To authenticate the identity of our Users, and to allow them to access our Service;

• To provide our Visitors, Users and Customers with assistance and support;

• To gain a better understanding on how Visitors and Users evaluate, use and interact with our Service, and how we could improve their and others' user experience, and continue improving our products, offerings and the overall performance of our Service;

• To facilitate and optimize our marketing campaigns, ad management and sales operations, and to manage and deliver advertisements for our products and services more effectively, including on other websites and applications. Such activities allow us to highlight the benefits of using our Service, and thereby to increase your engagement and overall satisfaction with our Service. This includes contextual, behavioral and interests-based advertising based on the Visitor's or User's activity, preferences or other data available to us or to our business partners;

• To contact our Visitors, Users and Customers (whether existing or prospective) with general or personalized service-related messages, as well as promotional messages that may be of specific interest to them (as further described in Section 6 below);

• To facilitate, sponsor and offer certain events, contests and promotions;

• To publish your feedback and submissions to our public forums and blogs;

• To support and enhance our data security measures, including for the purposes of preventing and mitigating the risks of fraud, error or any illegal or prohibited activity;

• To create aggregated statistical data, inferred non-personal data or anonymized or pseudonymized data (rendered non-personal), which we or our business partners may use to provide and improve our respective services, or for any other purpose; and

• To comply with applicable laws and regulations.

Notwithstanding anything to the contrary in the foregoing, in respect of Personal Data we obtain from Google OAuth API Scopes, used in our integration with certain Google services (the "Integrated Google Services"), our use of such Personal Data and data aggregated, anonymized, or derived therefrom (the "Restricted Personal Data"), is limited to the following:

• Facilitating, operating, supporting, providing and improving the Integrated Google Service;

• Troubleshooting or security purposes (such as investigating a bug or abuse);

• Compliance with applicable law and regulations;

• For our internal operations, provided that the Restricted Personal Data (including derivations thereof) have been aggregated and anonymized;

• Transfer of the Restricted Personal Data to third parties: (1) in accordance with this Privacy

Policy, solely to the extent necessary to provide or improve the Integrated Google Services; (2) to comply with applicable laws and regulations; and (3) in connection with any change in control, including by means of merger, acquisition or purchase of substantially all of DocuGen's assets; or

• In strict accordance with your affirmative agreement.

3. Data Location & Retention

We store your data in multiple locations around the world, for as long as necessary in accordance with our reasonable business needs (as necessary for the performance of our Service or for supporting and exercising our legitimate interests); and in accordance with our legal obligations.

Data Location: Your Personal Data may be maintained, processed and stored by us and our authorized Service Providers (defined below) in multiple locations, including in the United States of America, Israel and other jurisdictions, as reasonably necessary for the proper performance and delivery of our Service, or as may be required by law.

While privacy laws may vary between jurisdictions, DocuGen and its affiliates and Service Providers are each committed to protect Personal Data in accordance with this Privacy Policy and customary industry standards, regardless of any lesser legal requirements that may apply in their jurisdiction.

Data Retention: We will retain your Personal Data for as long as it is reasonably necessary in order to maintain and expand our relationship and provide you with our Service and offerings; in order to comply with our legal and contractual obligations; or to protect ourselves from any potential disputes (i.e. as required by laws applicable to log-keeping, records and bookkeeping, and in order to have proof and evidence concerning our relationship, should any legal issues arise following your discontinuance of use), all in accordance with our data retention policy.

Please note that except as required by applicable law or our specific agreements with you, we will not be obligated to retain your Personal Data for any particular period, and we are free to securely delete it or restrict access to it for any reason and at any time, with or without notice to you. If you have any questions about our data retention policy, please contact us by e-mail at legal@docugen.io.

4. Data Sharing

We share your data (& feedback) with our Service Providers; our Customers; within our group; in accordance with legal compliance and amongst Users on your shared boards.

Legal Compliance: In exceptional circumstances, we may disclose or allow government and

law enforcement officials access to your Personal Data, in response to a subpoena, search warrant or court order (or similar requirement), or in compliance with applicable laws and regulations. Such disclosure or access may occur if we believe in good faith that: (a) we are legally compelled to do so; (b)disclosure is appropriate in connection with efforts to investigate, prevent, or take action regarding actual or suspected illegal activity, fraud, or other wrongdoing; or (c) such disclosure is required to protect the security or integrity of our products and services.

Service Providers: We may engage selected third party companies and individuals to perform services complementary to our own. Such service providers include Third Party Service providers, hosting and server co-location services, communications and content delivery networks (CDNs), data and cyber security services, billing and payment processing services, fraud detection and prevention services, web analytics, e-mail distribution and monitoring services, session or activity recording services, remote access services, performance measurement, data optimization and marketing services, social and advertising networks, content providers, e-mail, voicemails, support and customer relation management systems, and our legal and financial advisors (collectively, "Service Providers").

These Service Providers may have access to your Personal Data, depending on each of their specific roles and purposes in facilitating and enhancing our Service, and may only use it for such limited purposes as determined in our agreements with them. When our Service Providers contact you in order to offer or promote our Service, they may additionally interest you in their own services. Should you decide to engage in such activities with DocuGen's Service Providers, please note that such engagement is beyond the scope of DocuGen's Terms and Privacy Policy and will therefore be covered by our Service Provider's terms and privacy policy.

Our Service Providers shall be deemed as 'Data Processors' in circumstances where DocuGen assumes the role of 'Data Controller'; and where DocuGen acts as the Data Processor for our Customer, the Service Provider shall be deemed our 'Sub-Processor' (as further described in Section 9 below). A list of DocuGen's Sub-Processors is available at https://docugen.io/subprocessors.

Third Party Websites and Services: Our Service also includes links to third party websites, and integrations with Third Party Services (as defined in the Terms). Such websites and Third Party Services, and any information you process, submit, transmit or otherwise use with such websites and Third Party Services, are governed by such third party's terms and privacy practices and policies, and not by this Privacy Policy. We encourage you to carefully read the terms and privacy policies of such website and Third Party Services.

Sharing Personal Data with our Customers and other Users: We may share your Personal Data with the Customer owning the Account to which you are subscribed as a User (including data and communications concerning your User Profile). In such cases, sharing such data means that the Account's Admin(s) may access it on behalf of the Customer, and will be able to monitor, process and analyze your Personal Data. This includes instances where you may

contact us for help in resolving an issue specific to a team of which you are a member (and which is managed by the same Customer).

Any Customer Data or other content submitted by you to private Boards may still be accessed, copied and processed by the Customer's Admin(s). Your User Profile and User Data will also be made available to all the authorized Users who can view the same Board(s) as you. Please note that DocuGen is not responsible for and does not control any further disclosure, use or monitoring by or on behalf of the Customer, that itself acts as the "Data Controller" of such data (as further described in Section 9 below).

If you register or access the Service using an e-mail address at a domain that is owned by your employer or organization (our Customer), and another team within such Customer's organization wishes to establish an account on the Service, certain information about you including your name, profile picture, contact info and general use of your account may become accessible to the Customer's Admins and Users.

Sharing your Feedback or Recommendations: If you submit a public review or feedback, note that we may (at our discretion) store and present your review to other users of our Sites and Service (including other Customers). If you wish to remove your public review, please contact us at legal@docugen.io. If you choose to send others an e-mail or message inviting them to use the Service, we will use the contact information you provide us to automatically send such invitation e-mail or message on your behalf. Your name and e-mail address may be included in the invitation e-mail or message.

Community Forum: Our Sites include public blogs or forums, such as docugen.io Community. Any information you submit on these forums, blogs and communities - including profile information associated with the Account you use to post the information - may be read, collected, and used by others who access these Sites. Due to the nature of such public forums, your posts and certain profile information may remain visible to all even after you terminate your Account. To request removal of your information from publicly accessible Sites operated by us, please contact us as provided in Section 10 below. In some cases, we may not be able to remove your information, in which case we will let you know if we are unable to and why.

Protecting Rights and Safety: We may share your Personal Data with others if we believe in good faith that this will help protect the rights, property or personal safety of DocuGen, any of our Users or Customers, or any members of the general public.

DocuGen Subsidiaries and Affiliated Companies: We may share Personal Data internally within our group, for the purposes described in this Privacy Policy. In addition, should DocuGen or any of its subsidiaries or affiliates undergo any change in control, including by means of merger, acquisition or purchase of substantially all of its assets, your Personal Data may be shared with the parties involved in such an event. If we believe that such change in control might materially affect your Personal Data then stored with us, we will notify you of this event and the choices you may have via e-mail or prominent notice on our Service.

For the avoidance of doubt, DocuGen may share your Personal Data in additional manners, pursuant to your explicit approval, or if we are legally obligated to do so, or if we have successfully rendered such data non-personal and anonymous. We may transfer, share or otherwise use non- personal data at our sole discretion and without the need for further approval.

5. Cookies and Tracking Technologies

We and our Service Providers use cookies and other technologies for performance, tracking, analytics and personalization purposes.

Our Sites and Service (including some of our Service Providers) utilize “cookies”, anonymous identifiers, container tags and other technologies in order for us to provide our Service and ensure that it performs properly, to analyze our performance and marketing activities, and to personalize your experience. Such cookies and similar files or tags may also be temporarily placed on your device. Certain cookies and other technologies serve to recall Personal Data, such as an IP address, previously indicated by a User. To learn more about our practices concerning Cookies and Tracking, please see our Cookie Policy.

Please note that we do not change our practices in response to a “Do Not Track” signal in the HTTP header from a browser or mobile application; however, most browsers allow you to control cookies, including whether or not to accept them and how to remove them. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser.

6. Communications

We engage in service and promotional communications, through e-mail, phone, SMS and notifications.

Service Communications: We may contact you with important information regarding our Service. For example, we may send you notifications (through any of the means available to us) of changes or updates to our Service, billing issues, service changes, log-in attempts or password reset notices, etc. Our Customers, and other Users on the same Account, may also send you notifications, messages and other updates regarding their or your use of the Service. You can control your communications and notifications settings from your User Profile settings. However, please note that you will not be able to opt-out of receiving certain service communications which are integral to your use (like password resets or billing notices).

Promotional Communications: We may also notify you about new features, additional offerings, events and special opportunities or any other information we think our Users will find valuable. We may provide such notices through any of the contact means available to us (e.g. phone, mobile or e-mail), through the Service, or through our marketing campaigns on any other

sites or platforms.

If you do not wish to receive such promotional communications, you may notify DocuGen at any time by sending an e-mail to legal@docugen.io, changing your communications preferences in your User Profile settings, or by following the “unsubscribe”, “stop”, “opt-out” or “change e-mail preferences” instructions contained in the promotional communications you receive.

7. Data Security

We secure your Personal Data using industry-standard physical, procedural and technical measures.

In order to protect your Personal Data held with us, we are using industry-standard physical, procedural and technical security measures, including encryption as appropriate. However, please be aware that regardless of any security measures used, we cannot and do not guarantee the absolute protection and security of any Personal Data stored with us or with any third parties as described in Section 4 above.

8. Data Subject Rights

Individuals have rights concerning their Personal Data. You may exercise your rights by contacting us or your Account Admin.

If you wish to exercise your rights under any applicable law, including the EU General Data Protection Regulation (GDPR) or the California Consumer Privacy Act (CCPA), such as the right to request access to, and rectification or erasure of your Personal Data held with DocuGen, or to restrict or object to such Personal Data’s processing, or to port such Personal Data, or the right to equal services and prices (each to the extent available to you under the laws which apply to you) – please contact us by e-mail at legal@docugen.io.

Please note that once you contact us by e-mail, we may instruct you on how to fulfill your request independently through your User Profile settings; or may require additional information and documents, including certain Personal Data, in order to authenticate and validate your identity and to process your request. Such additional data will then be retained by us for legal purposes (e.g. as proof of the identity of the person submitting the request), in accordance with Section 3 above.

If you would like to make any requests or queries regarding Personal Data we process on your Account owner’s (our Customer’s) behalf, please contact the Account’s Admin directly. For example, if you are a User who wishes to access, correct, or delete data processed by DocuGen on behalf of a Customer, please direct your request to the relevant Customer (who is the “Data Controller” of such data – see Section 9).

9. Data Controller/Processor

We are the Controller of our Visitors' and Customers' Personal Data, and certain types of User Data; we are the Processor of any Personal Data contained in Customer Data, and of User Data processed on behalf of our Customer.

Certain data protection laws and regulations, such as the GDPR or the CCPA, typically distinguish between two main roles for parties processing Personal Data: the "Data Controller" (or under the CCPA, "business"), who determines the purposes and means of processing; and the "Data Processor" (or under the CCPA, "service provider"), who processes the data on behalf of the Data Controller (or business). Below we explain how these roles apply to our Service, to the extent that such laws and regulations apply.

DocuGen is the "Data Controller" of its Visitors' and Customers' Personal Data, as well as User Data consisting of profile and contact details, as well as usage, preferences, engagement and analytics data. With respect to such data, we assume the responsibilities of Data Controller (solely to the extent applicable under law), as set forth in this Privacy Policy. In such instances, our Service Providers processing such data will assume the role of "Data Processor".

If any of our Users upload or submit Customer Data or other content to our Service which includes Personal Data (e.g., by submitting their own clients' contact details to one of their Boards), such data will only be processed by DocuGen on behalf of our Customer, which is the owner of the respective Account, along with all other User Data processed on such Customer's behalf.

In such instances, our Customer shall be deemed the "Data Controller" of such data, and DocuGen will process such data on the Customer's behalf, as its "Data Processor", in accordance with its reasonable instructions, subject to our Terms, our Data Processing Agreement with such Customer (to the extent applicable) and other commercial agreements. DocuGen's Service Providers shall act as designated Sub-Processors in these instances. The Customer will be responsible for meeting any legal requirements applicable to Data Controllers (such as establishing a legal basis for processing and responding to Data Subject Rights requests concerning the data they control).

10. Additional Notices

We may update this policy from time to time; we are not responsible for other websites' or services' privacy practices; we have appointed a Data Protection Officer and have designated a Representative in the EU.

Updates and Amendments: We may update and amend this Privacy Policy from time to time by posting an amended version on our Service. The amended version will be effective as of the

date it is published. When we make material changes to these Terms, we'll provide Customer with notice as appropriate under the circumstances, e.g., by displaying a prominent notice within the Service or by sending Customer an email. Your continued use of the Service after the changes have been implemented will constitute your acceptance of the changes.

External Links: While our Service may contain links to other websites or services, we are not responsible for their privacy practices. We encourage you to pay attention when you leave our Service for the website or application of such third parties, and to read the privacy policies of each and every website and service you visit. This Privacy Policy applies only to our Service.

Our Service is not designed to attract children under the age of 16: We do not knowingly collect Personal Data from children and do not wish to do so. If we learn that a person under the age of 16 is using the Service, we will attempt to prohibit and block such use and will make our best efforts to promptly delete any Personal Data stored with us with regard to such child. If you believe that we might have any such data, please contact us by e-mail at legal@docugen.io.

EU Representative: DocuGen has not yet designed a representative in the European Union for data protection matters pursuant to Article 27 of the GDPR.

Questions, concerns or complaints: If you have any comments or questions regarding our Privacy Policy, or if you have any concerns regarding your Personal Data held with us, please contact us at legal@docugen.io. If you are a GDPR-protected individual, you also have the right to lodge a complaint with an EU supervisory authority.

Compliance with Google Limited User Policy: DocuGen's use and transfer of information received from Google APIs to any other app will adhere to Google API Services User Data Policy, including the Limited Use requirements.

Last updated: 23 Nov 2023.