

## PRIVACY POLICY AND COOKIE POLICY - UPDATED 2024-03-26

Freeze Inc. and its subsidiaries and affiliates ("Freeze") respects your data privacy and is committed to protecting it through our compliance with this "Privacy Policy". Any data collected, used, or shared as a result of your use or access of our websites located at freeze.com and account.freeze.com (the "Website") and any other services provided by us (collectively, the "Services") will be in accordance with this Privacy Policy. This Privacy Policy does not apply to data that is collected by third-party websites, applications, and services that are integrated with or linked to our Website and Services (the "Third-Party Services").

### TYPES OF INFORMATION AND DATA COLLECTED BY FREEZE FOR SERVICE

Freeze collects the following types of information from organizations and individuals under the terms of a Master Service Subscription Agreement ("MSSA") for the purpose of providing the service described within the MSSA. Freeze will only disclose this information to provide service, analyze service operations, and report the status of service. Freeze will not use this information for marketing or website analytics.

1. Account Email Address - A Freeze user must sign in to Freeze's website using an email address. This email address serves as an identifier for a Freeze account and an identifier that may be known to organizations that collect data about individuals or organizations. When a representative for an organization agrees to purchase a subscription for service according to the terms of the MSSA, this email address may be shared with Stripe to manage the subscription and billing information subject to the terms expressed in <https://stripe.com/privacy> and <https://stripe.com/legal/cookies-policy>.
2. Authorization Agreement Data - An individual receiving service from Freeze must provide a full name, address, and date of birth in an Authorization Agreement. A representative for an organization receiving service from Freeze must provide a name for the representative, a title for the representative, a name for the organization, and a principal address for the organization. Freeze may collect and store this data, associated with the account email address, through an integration with PandaDoc, subject to the terms expressed in <https://www.pandadoc.com/privacy-notice/> and <https://www.pandadoc.com/cookie-notice/>.
3. Profile Data - An individual receiving service from Freeze may provide personal identifiers that may be known to organizations that collect data about individuals, including names, email addresses, phone numbers, and street addresses. A representative for an organization receiving service from Freeze may provide personal identifiers and organization identifiers that may be known to organizations that collect data about individuals or organizations, including names, email addresses, phone numbers, and street addresses.
4. Organization Directory Data - A representative for an organization may configure integrations with the following services, allowing Freeze to access a directory of information about the organization, the organization's employees, the organization's contractors, the organization's members, or other individuals.
  - a. Google Workspace - Freeze's use and transfer to any other app of information received from Google APIs will adhere to Google API Services User Data Policy (<https://developers.google.com/terms/api-services-user-data-policy>), including the Limited Use requirements.

During the directory integration, Freeze requests offline access to the organization's information through the Admin SDK API under the following scopes:

- i. .../auth/admin.directory.user.readonly
  - ii. .../auth/admin.directory.user.alias.readonly
  - iii. .../auth/admin.directory.customer.readonly
  - iv. .../auth/admin.directory.userschema.readonly
5. User Support Data - Freeze provides support for individuals and organization representatives through a set of email addresses within the support.freeze.com domain.
  6. Subscription Data - Freeze manages subscriptions and orders for organizations and individuals through the following services.
    - a. Stripe - subject to the terms expressed in <https://stripe.com/privacy> and <https://stripe.com/legal/cookies-policy>.
    - b. PandaDoc - subject to the terms expressed in <https://www.pandadoc.com/privacy-notice/> and

<https://www.pandadoc.com/cookie-notice/>.

7. Website Session Data - <https://account.freeze.com> utilizes one first-party cookie, "\_\_Host-a", to store a session identifier in an individual or organization representative's web browser.

Freeze will delete all Profile Data and Organization Directory Data within 30 days after the organization's subscription terminates. Freeze will delete Website Session Data within 30 days of its creation. Freeze will retain all other data types in perpetuity, as is necessary to support actions taken while providing service to organizations and individuals.

## TYPES OF INFORMATION COLLECTED BY FREEZE FOR WEBSITE ANALYTICS AND MARKETING

Cloudflare Web Analytics collects website browsing behavior data for all traffic to freeze.com and its subdomains subject to the terms expressed in <https://www.cloudflare.com/privacypolicy/> and <https://www.cloudflare.com/cookie-policy/>.

Freeze depends on Cloudflare's IP Geolocation technology to determine where requests to freeze.com and its subdomains originate (<https://developers.cloudflare.com/network/ip-geolocation/>). When requests to freeze.com and its subdomains originate from the United States, Freeze collects the following data for the purpose of website analytics and marketing. Freeze depends on

1. Account Email Address - The following organizations may receive this data while providing services to Freeze.
  - a. Stripe - subject to the terms expressed in <https://stripe.com/privacy> and <https://stripe.com/legal/cookies-policy>.
  - b. HubSpot - subject to the terms expressed in <https://legal.hubspot.com/privacy-policy> and <https://legal.hubspot.com/cookie-policy>.
2. Website Browsing Behavior Data - Freeze utilizes cookies and software from the following third-party services on freeze.com and its subdomains. Freeze may set first-party cookies on behalf of these third-party services and these third-party services may set third-party cookies in an individual or organization representative's web browser.
  - a. Cloudflare - subject to the terms expressed in <https://www.cloudflare.com/privacypolicy/> and <https://www.cloudflare.com/cookie-policy/>.
  - b. HubSpot - subject to the terms expressed in <https://legal.hubspot.com/privacy-policy> and <https://legal.hubspot.com/cookie-policy>.
  - c. Google Analytics and Google Ads - subject to the terms expressed in <https://policies.google.com/privacy> and <https://policies.google.com/technologies/cookies>
3. Marketing Form and Chat Data - Freeze may collect data about individuals and organization representatives expressing interest in service through forms and chat services provided by HubSpot, subject to the terms expressed in <https://legal.hubspot.com/privacy-policy> and <https://legal.hubspot.com/cookie-policy>.

## INTERNATIONAL DATA TRANSFERS

Freeze is headquartered in the United States, and stores and processes all service-related data in data centers located within the United States. This includes information collected from our users, both from within the United States and internationally.

For users residing outside the United States, including those in Europe or any other region with laws governing data collection and use that may differ from U.S. law, please be aware that by using our service, you agree to the transfer of your information to the United States. Freeze takes the privacy and protection of your information very seriously and implements measures to ensure that your data is treated securely and in accordance with this privacy policy.

Freeze adheres to applicable legal frameworks regarding the international transfer of personal data. For users in the European Economic Area (EEA), the United Kingdom, or Switzerland, Freeze complies with the General Data Protection Regulation (GDPR) and other relevant data protection laws. We ensure that adequate safeguards are in place for such transfers, which may include standard contractual clauses approved by the European Commission, reliance on the European Commission's adequacy decisions about certain countries, as applicable, or other legally accepted means.

If you have any questions or concerns about these data practices, including our practices related to the international transfer of personal data, please contact us using the contact information provided in this policy.

## USER RIGHTS AND CHOICES

Freeze recognizes the importance of your privacy and is committed to ensuring that your rights are respected and protected. Depending on where you reside, you may be entitled to certain rights regarding the personal information we hold about you. We aim to provide you with control over your data and support your rights to:

1. Access Your Information - You have the right to request access to the personal information we hold about you, including details about how we use it and who we share it with.
2. Correct Your Information - If you believe that any information we hold about you is incorrect or incomplete, you have the right to request its correction or updating.
3. Delete Your Information: You have the right to request the deletion of your personal information from our records, subject to certain exceptions prescribed by law and the MSSA.
4. Restrict Processing - In certain circumstances, you have the right to request that we restrict the processing of your personal information.
5. Data Portability - Where technically feasible, you have the right to request a copy of your personal information in a structured, commonly used, and machine-readable format, and to have it transferred to another data controller.
6. Object to Processing - You have the right to object to the processing of your personal information in some situations, such as for direct marketing purposes.
7. Withdraw Consent - If we are processing your personal information based on your consent, you have the right to withdraw that consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
8. Automated Decision-Making and Profiling - You have the right to be free from decisions based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you, unless such profiling is necessary for entering into, or the performance of, a contract between you and us, or is based on your explicit consent.

To exercise any of these rights, please contact us using the contact information provided in this privacy policy. We may request specific information from you to help us confirm your identity and process your request. Applicable law may allow or require us to refuse your request, and we will inform you of the reasons for any refusal.

We are committed to providing you with meaningful choices about the information we collect, and that's why we provide you with the ability to opt-out of certain uses of your information. For instance, you can opt-out of receiving marketing emails from us by following the unsubscribe link included in such emails.

Please note that exercising these rights may affect our ability to provide you with certain products or services.

For more information about your privacy rights, or if you have any complaints about our privacy practices, please contact us using the contact information provided in this policy. Residents of certain jurisdictions may also have the right to lodge a complaint with their local data protection authority.

## SECURITY MEASURES

Freeze is committed to protecting the security and privacy of our users' data. We understand the importance of implementing robust security measures to safeguard against unauthorized access, alteration, disclosure, or destruction of personal information and data collected through our services. To achieve this, we employ a combination of technical, administrative, and physical security controls that are designed to protect our systems and our users' information:

1. Encryption - Where appropriate, we use encryption technology to protect data in transit and at rest. This means that when you provide us with personal information or when that information is being transferred between systems, it is encrypted using industry-standard methods to ensure that it is protected from interception by

third parties.

2. Access Control - We restrict access to personal information to Freeze employees, contractors, and agents who need to know that information in order to process it for us. These individuals are bound by confidentiality obligations and may be subject to disciplinary measures, including termination and criminal prosecution, if they fail to meet these obligations.
3. Regular Security Assessments - Our security team regularly reviews and updates our security practices to address evolving threats and vulnerabilities. This includes conducting regular security assessments and penetration testing to identify and remediate potential security issues.
4. Secure Development Practices - We incorporate security considerations into our software development lifecycle. This includes implementing secure coding practices, regular code reviews, and integrating security into our software development and deployment processes.
5. Incident Response Plan - In the unlikely event of a data breach, we have an incident response plan in place to promptly address and mitigate the impact. This plan includes procedures for responding to and recovering from security incidents, notifying affected individuals and regulatory bodies as required by law, and taking steps to prevent future occurrences.
6. User Education and Awareness - We believe that security is a shared responsibility. As such, we provide our users with information on how to protect their accounts and personal information, including recommending strong, unique passwords and being vigilant against phishing attempts.

We are committed to continuously improving our security measures in response to new challenges and threats. Please be assured that protecting the privacy and security of your information is a top priority for us. If you have any questions or concerns about our security practices, please contact us using the contact information provided in this policy.

## CHILDREN'S PRIVACY

Freeze's commitment to protecting the privacy of young users is a top priority. We recognize the importance of safeguarding the personal information of children who use our service. In compliance with relevant child protection laws and regulations, our service is designed to be accessible to users under the age of 18 only with explicit parental or guardian consent.

To ensure the safety and privacy of our underage users, we require the completion of an Authorization Agreement for any user under the age of 18. This Agreement must be electronically signed by the user's parent or legal guardian before the service can be accessed by the underage user. The Authorization Agreement is designed to ensure that guardians are fully informed about our service, the types of information we collect, and how it is used and protected.

We collect only the information necessary to provide our service to underage users. This may include, but is not limited to, name, contact information, and usage data. The collection and use of this information are strictly for the purpose of delivering our service effectively and ensuring a safe user experience.

Parents or guardians who have completed the Authorization Agreement on behalf of an underage user have the right to review the personal information collected from their child, request the deletion of such information, and refuse any further collection or use of the child's information. Guardians can exercise these rights by contacting us directly through the contact information provided in this policy.

We implement robust security measures to protect the privacy and integrity of all our users' information, with special attention to the data of underage users. We strive to ensure that their information is protected against unauthorized access, alteration, or destruction.

We may update our Children's Privacy section to reflect changes in our practices or in the applicable regulations. Guardians will be notified of any significant changes to how we handle children's privacy and will have the opportunity to review and re-affirm their consent under the updated policy conditions.

If you have questions or concerns about our children's privacy practices or the Authorization Agreement, please contact

us using the contact information provided in this policy. We are committed to working with parents and guardians to ensure a safe and positive experience for all our underage users.

#### CHANGES TO THE PRIVACY POLICY

Freeze reserves the right to update or modify this Privacy Policy at any time and for any reason, without prior notice, to reflect changes in our practices or to comply with new laws and regulations. We are committed to maintaining transparency with our users about how we collect, use, and safeguard personal information. Therefore, we encourage you to review our Privacy Policy periodically to stay informed about our data protection practices.

Any significant changes to our privacy practices will be communicated through our website, or, where feasible, directly to you via email, before they become effective. This is to ensure that you are always aware of the information we collect, how we use it, and under what circumstances, if any, we disclose it. The date at the top of this Privacy Policy indicates when it was last updated. Your continued use of our service after any changes or revisions to this Privacy Policy become effective signifies your agreement with the terms of the revised policy.

Please note that we may also provide additional privacy notices on specific occasions when we are collecting or processing personal information about you, so that you are fully aware of why we are using that information and the legal basis for such usage. These notices may supplement or clarify our privacy practices or may provide you with additional choices about how we process your personal information.

If you have any questions or concerns about our Privacy Policy or our data practices, please contact us using the contact information provided in this policy.

#### CONTACT INFORMATION

If you have any questions or concerns regarding our privacy practices, please do not hesitate to contact us by sending an email to [general@support.freeze.com](mailto:general@support.freeze.com). We are committed to ensuring the privacy and security of your information and are available to address any inquiries or requests you may have.