



Introduction

Sovereign, Inc. (“Sovereign,” “we,” “us,” or “our”) values individuals’ (“you” or “your”) privacy. In this Privacy Policy (“Policy”), we describe how we and our corporate affiliates may collect, use, store, and disclose your information as it relates to:

- Our data services – these are the data products and services that we provide to our Customers (the “Data Services”); and
- This website, www.sovereign.ai (the “Website” or “Site”).

Our customers (“Customers”) are entities that use our Data Services.

Our partners (“Partners”) are companies that collect information from individuals, including their mobile device’s location information, and provide that information to us in different data sets so that we can assist our Customers.

By visiting the Website, you agree that your information will be handled as described in this Policy. Your use of this Site is subject to this Policy.

Please note that this Policy does not cover our Customers’ use of the information we provide to them. Our Customers may associate the information we provide with additional information they have from other sources and may use this combined information for a variety of purposes, such as, consumer insights, security and risk management, movement analytics, law enforcement and national security.

If you are located in the European Economic Area (EEA), the United Kingdom, or Switzerland, please refer to the EEA, U.K. & Switzerland Privacy notice.

Who We Are

Sovereign provides real-world location intelligence. Our platform merges, categorizes and interprets disparate Location Data (as defined below). Our Customers rely on our Data Services to power their security and risk management solutions, understand movement patterns for purposes of law enforcement and national security, and to provide and improve the services they offer to their own customers.

Description of Service

Sovereign collects and processes various types of information from mobile devices, which we receive from our third-party partners (“Partners”). The data we receive from our Partners includes location data in the form of latitude/longitude (“Location Data”), which is associated with a mobile advertising ID, such as Apple’s Identifier for Advertisers (IDFA) or a Google Advertising ID (Advertising ID/Ad ID). Our various solutions allow our Customers to incorporate the Location Data into their own proprietary applications and analyses, create data analytics reports, and visualize Location Data through our proprietary software tool (the “Portal”). We also may receive other information from our Partners about your device, such as IP address and Device User Agent Data (as defined below) which may be included in our Data Services.

Our Data Practices

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1. Information We Collect About You

We collect the following information when you browse or submit an inquiry on our **Website**, contact us to request information about our products or services, or apply for a job.

Information Category	Description of Information Collected
Identifiers	IP address, and the following information if you choose to provide it to us: name, email address, phone number; job and company information, and state
Device Information	Your browser type and operating system, time zone setting and location, browser plug-in types and versions.
Internet or Network Activity	Web pages you view, links you click, the length of time you visit our Site, and the webpage that led you to our Site.
Communications Preferences	Your preferences in receiving marketing from us and your communication preferences.
Professional or Employment Information	If you apply for a job, current or past job history or performance evaluations.

We collect the following information about you from our Partners and use it to provide our **Data Services**:

Information Category	Description of Information Collected
Location Data	Precise geolocation data, including latitude-longitude coordinates obtained from mobile Apps via requests to the mobile device operating system which utilizes various mechanisms to derive Location Data, including GPS tools, cell tower triangulation, WiFi data, or other techniques. We do not collect your precise geolocation in real-time. Neither Sovereign, nor its third-party data partners determine whether Location Data is received from GPS signals, cell tower triangulation, WiFi data, or by other techniques. The device operating system determines which signal is most readily available to the device and returns the Location Data to the corresponding mobile application provider.
Identifiers	IP address; mobile advertiser ID (“MAID”); hashed e-mail
Internet or Network Activity	Timestamp, list of mobile applications from which location signals were received.
Device User Agent Data	Device type; browser family; browser version; operating system; version of operating system; device model number, carrier data.
Demographic Data	Age, gender, generational suffix, marital status, parental status, number of children, educational level, yearly income.

We collect the following information from you (or on your behalf) when you use our **Data Services**:

Information Category	Description of Information Collected
User Data	Name and email address provided by you or your Company so that Sovereign may enable you to create an account to access the Portal.
Usage Data	This is information that Sovereign collects about you when you’re accessing and/or using the Portal and includes: session information (login time, usage time, logout time, number of searches, nature of search)

2. How We Use Your Information

Sovereign uses information we collect through our **Website** for the following purposes:

- **Providing and Improving Our Services.** We use your information to provide, improve, and personalize our services to you, including improving our Portal.
- **Marketing and Communications.** We use your information to communicate with you about our services, respond to your inquiries, administer surveys and questionnaires, to provide customer service, and for marketing and promotional purposes. For example, we may use your information to send you news and newsletters, special offers, and promotions, or to otherwise contact you about products or information we think may interest you. We also may use the information that we learn about you to assist us in advertising our services.
- **Research and Analytics.** To better understand how you access and use our Website, and for other research and analytical purposes.
- **Protecting Rights and Interests.** To protect the safety, rights, property, or security of Sovereign, our services, any third party or Partner, or the general public; to detect, prevent, or otherwise address fraud, security, or technical issues; to prevent or stop activity that Sovereign, in its sole discretion, may consider to be, or pose a risk of being, an illegal, unethical, or legally actionable activity; to use as evidence in litigation; to conduct audits; and to enforce this Policy.
- **Legal Compliance.** To comply with applicable legal or regulatory obligations, including as part of a judicial proceeding; to respond to a subpoena, warrant, court order, or other legal process; or as part of an investigation or request, whether formal or informal, from law enforcement or a governmental authority.

Sovereign uses the information we receive from our Partners to provide **Data Services** to our Customers. We do not use information collected through our Website to provide our Data Services.

We do not use the information we collect about you to determine employment eligibility, credit eligibility, insurance eligibility, underwriting, or for pricing purposes.

3. How We Share Your Information

We may share your information as follows:

- **Affiliates:** We may disclose your information to our affiliates or subsidiaries; however, if we do so, their use and disclosure of your information will be subject to this Policy.
- **Service Providers:** We may disclose the information we collect to third party vendors, service providers, and contractors or agents, who perform functions on our behalf.
- **Customers:** When we provide our Data Services, we share with our Customers your information, including your device's Location Data, mobile advertising ID, and other device information. Our Customers may use this information for purposes such as security and risk management, movement analytics, law enforcement, national security, and public health. In some circumstances, our Customers may also resell your information to other third parties for similar purposes.
- **Analytics Providers.** We may disclose information we collected through our Website to our Website analytics providers such as Google Analytics, to evaluate usage of our Site, and to help

us improve Website performance and user experiences. 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>.

- **Business Transfers.** If we are invested in, acquired by or merged with another company, if substantially all of our assets are transferred to another company, or as part of a bankruptcy proceeding, or other similar business transaction, we may share your information with, or transfer the information we have collected from you to the other company.
- **To Protect Us and Others.** We may share your information where we believe it is necessary to investigate, prevent, or act regarding illegal activities, suspected fraud, potential threats to the safety of any person, violations of this Policy, or as evidence in litigation in which Sovereign is involved.
- **In Response to Legal Process.** We also may disclose the information we collect if we believe that such action is necessary to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a court order or a subpoena.
- **With Your Consent.** We may disclose the information we collect from you with your consent.

4. Supplementary Information for Individuals Residing In Select U.S. States

Under various U.S. State privacy laws, you may have certain additional rights that pertain to your data privacy. These additional privacy laws require Sovereign to provide individuals with certain information about the processing of their “personal information” and the rights that are available to them under such laws.

Personal Information

Generally, “*personal information*” is defined as “any information that directly or indirectly identifies, relates to, describes, or can be associated with or reasonably linked to “an individual or household”, including, name, address, mobile device identifiers, precise location data, IP and cookie identifiers, inferences, and biometric data.

The following table discloses what categories of “personal information” (as defined by various U.S. state privacy laws) we have collected from or about individuals within the last twelve (12) months:

Personal Information Collected by Sovereign

"Personal Information" Category	"Personal Information Examples"	Website	Data Partners	Your use of the Portal

<p>Identifiers</p>	<p>Name, address, device identifier, Internet Protocol (IP) address, email address, cookies, web beacons, account name, social security number, passport number, or other similar identifiers</p>	<p>(i) Device identifier and IP address, and (ii) name, phone number, and email address, but only to the extent you have provided us with this information when you submit a comment or request through our Website.</p>	<p>Device identifier, IP address</p>	<p>User Data, and as part of Usage Data only.</p>
<p>Customer Records</p>	<p>Name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</p>	<p>Name, phone number</p>	<p>No</p>	<p>No</p>

Internet or Network Activity	Browsing history, search history, information on a consumer's interaction with a website, or application	Browsing history, search history, information on a consumer's interaction with a website, or application	Timestamp and lists of mobile applications from which location signals were received.	As part of Usage Data only.
Geolocation Data	Physical location or movements	No	Timestamp, latitude, longitude	No
Professional or Employment Information	Current or past job history or performance evaluations	Yes, to the extent you provide us with this information as part of an application for employment.	No	Email address only.
Protected Classification Characteristics under U.S. State Privacy Laws or Federal Law ("Demographic Data")	Race, color, national origin, religion, gender, age, or disability	No	Age and gender	No

Categories of Sources of Personal Information

We receive your personal information from the following categories of sources:

- **From you.** Directly from you through your provision of the information to us directly on our Website or automatically from your use of our Website or as described further in this Privacy Policy;
- **Our customers.** Our customers may directly provide us with your information for our performance of services to them; and
- **Third Parties and Partners.** Our third-party data suppliers (data resellers) who either directly or indirectly collect your personal information and provide it to us for our provision of the Data Services, as described in this Privacy Policy.

Use of Personal Information

Please refer to the “How We Use Your Information” section of this [Privacy Policy](#) for information on how we use your personal information with respect to the Data Services and our Website.

Disclosing Personal Information for a Business Purpose

Business Purpose

We may share your personal information with affiliates and service providers for a business purpose, which different privacy laws generally define as the use of personal information for operational or other notified purposes. In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

- Identifiers;
- Geolocation Data;
- Internet or Network Activity;
- User Data;
- Usage Data; and
- Demographic Data

The following are categories of third parties to whom we have disclosed your personal information for a business purpose:

- Our affiliates; and
- Service providers.

Sale of Personal Information

In the preceding twelve (12) months, we have sold the following categories of personal information in order to monetize our Data Services:

- Identifiers;
- Geolocation Data;
- Internet or Network Activity; and
- Demographic Data.

We do not sell User Data or Usage Data that we collect as part of your use of the Portal. Categories of parties to whom we have sold your personal information:

- Our affiliates;
- Vendors;
- Third parties, which include our customers, partners, law enforcement, data management platforms, and data management platforms.

Your Rights in Connection with Personal Information

Many U.S. State privacy laws grant you a number of rights (subject to certain exceptions) with respect to your personal information that companies may hold about you. Each of your rights is outlined in more detail below:

- **Right to Know & Right to Access.** You have the right to request that we tell you:
 - the categories of personal information we collected, sold, or disclosed for a business purpose in the previous 12 months;
 - the categories of sources from which we collected such personal information;
 - the business or commercial purposes for collecting and selling such personal information; and
 - the categories of third parties to whom we sold or disclosed for a business purpose such personal information and the specific categories of personal information sold or disclosed to each category of third party.
- **Right to Access/Portability.** You have the right to receive a copy of the specific pieces of personal information that we have collected from you in the 12 months preceding your request. Upon confirming your identity, we will disclose to you a copy of the specific pieces of personal information that we have collected about you.
- **Right to Delete.** You have the right to ask us to delete or remove the personal information we have collected from you and retained. Upon our confirmation of your request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies (for example, where your information helps us comply with a legal obligation, or detect or prevent security incidents, or as required to comply with applicable law).
- **Right to Opt-Out of Sale.** Where we sell your personal information, you have a right to opt out of such sale and any further resale of your personal information. You can opt-out of the sale of your personal information [here](#) or by clicking on the “Opt-Out and Do Not Sell” link available on the home page, and on all other Sovereign Website landing pages. If we receive any opt-out request either directly or through a third-party partner, we will cease selling your personal information, as “sale” is defined under U.S. State privacy laws.

How to Exercise your Rights

In order to exercise any of the rights described above, please contact Sovereign Intelligence, LLC. by either:

- emailing them at: dpo@sovereign.ai

We may need to request specific and/or additional information from you to help us confirm your identity and ensure your right to access or delete your personal information. This is a security measure designed to prevent the disclosure of your personal information to a person who has no right to receive it. We will only use this information to verify your identity or authority to make the request. An authorized agent submitting a request on behalf of a consumer must demonstrate that the consumer provided written permission, signed by the consumer authorizing the agent to act on the consumer’s behalf. For requests

for information and deletion, Venntel may require that the consumer verify its own identity directly with Venntel and directly confirm that the consumer provided the authorized agent permission to submit the request.

We will deliver our written response by mail or electronically, at your option. We will not charge you a fee for access to your personal information (or to exercise any of your other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, excessive, or manifestly unfounded, or we may refuse to comply with your request in these circumstances.

We will not be obligated to respond to more than 2 requests for data access/data portability in a 12-month period. Any responses will cover the 12-month period preceding your request.

If you have opted out of the sale of your personal information, you may change your mind and opt back in at any time by contacting dpo@sovereign.ai.

Non-Discrimination

Privacy laws prohibit discrimination against individuals for exercising their rights and imposes requirements on any financial incentives offered to individuals related to their personal information. Sovereign will not discriminate against you for exercising any of your privacy rights.

Shine the Light

California's Shine the Light Law (Civil Code 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please refer to any of the contact methods in the [Contact Information](#) section below.

5. Our Use of Cookies and Other Tracking Mechanisms

We and our third party service providers use cookies and other tracking mechanisms to track information about your use of our Site. We may combine this information with other information we collect from you (and our third party service providers may do so on our behalf).

Currently, our systems do not recognize browser "do-not-track" requests. You may, however, disable certain tracking as discussed in this section (e.g., by disabling cookies).

Cookies. Cookies are alphanumeric identifiers that we transfer to your computer's hard drive through your web browser for record-keeping purposes. Some cookies allow us to make it easier for you to navigate our Site and Data Services, while others are used to enable a faster log-in process or to allow us to track your activities at our Site and Data Services. There are two types of cookies: session and persistent cookies.

- **Session Cookies.** Session cookies exist only during an online session. They disappear from your computer when you close your browser or turn off your computer. We use session cookies to allow our systems to uniquely identify you during a session or while you are logged into the Site. This allows us to process your online transactions and requests and verify your identity, after you have logged in, as you move through our Site.
- **Persistent Cookies.** Persistent cookies remain on your computer after you have closed your browser or turned off your computer. We use persistent cookies to track aggregate and statistical

information about user activity, and to display advertising both on our Site and on third-party sites.

Disabling Cookies. Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future. The Help portion of the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Visitors to our Site who disable cookies will be able to browse certain areas of the Site, but some features may not function.

Clear GIFs, pixel tags and other technologies. Clear GIFs are tiny graphics with a unique identifier, similar in function to cookies. In contrast to cookies, which are stored on your computer's hard drive, clear GIFs are embedded invisibly on web pages. We may use clear GIFs (a.k.a. web beacons, web bugs or pixel tags), in connection with our Site to, among other things, track the activities of Site visitors, help us manage content, and compile statistics about Site usage. We and our third party service providers also use clear GIFs in HTML e-mails to our customers, to help us track e-mail response rates, identify when our e-mails are viewed, and track whether our e-mails are forwarded.

6. Third-Party Links

Our Site and Services may contain links to third-party websites. Any access to and use of such linked websites is not governed by this Policy, but instead is governed by the privacy policies of those third party websites. We are not responsible for the information practices of such third party websites.

7. Security of Your Information

We have implemented appropriate administrative, technical, and physical safeguards to protect the information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Please be aware that despite our best efforts, no data security measures can guarantee security.

8. Privacy Choices

Data Services Opt Out. If you would like to opt-out of our use of your device's Location Data and other related data we use in our Data Services, you can (a) disable location services on your mobile device, or (b) complete the [Opt-Out & Do Not Sell Form](#). Please note that your opt-out will be specific to the device for which you submit the opt-out request. This means that if you use multiple devices, you will need to opt out each device that you use. In addition, if you re-set your mobile advertising ID, you will need to opt out that device again.

Email Marketing Opt Out. You may opt-out of receiving promotional communications from us by following the opt-out instructions contained in the e-mail. Please note that it may take up to 10 business days for us to process opt-out requests. If you opt-out of receiving promotional emails about recommendations or other information we think may interest you, we may still send you e-mails about your account or any services you have requested or received from us.

9. Retention

We retain your personal information for so long as retention is necessary to comply with our legal and contractual obligations, enforce our agreements, and enable us to investigate events and resolve disputes. We store Location Data, Internet or Network Activity, and Device User Agent Data associated with a particular mobile advertising ID and used for our Data Services, for up to four (4) years, provided, we

may retain such personal information for a longer period to the extent it is required for a legal or significant operational purpose, such as for compliance, record-keeping, auditing, safety and security, and error or bug prevention.

10. Children

Our Services are not designed for children under 16. If we discover that a child under 16 has provided us with personal information, we will delete such information from our systems.

CONTACT US

If you have any questions or would like to speak with us regarding changes to your personal information, please email us at: dpo@sovereign.ai

CHANGES TO THIS PRIVACY POLICY

This Policy is current as of the Effective Date set forth above. We will post any changes to this Policy on our Site. If we make any changes to this Policy that materially affect our practices with regard to the information we have previously collected from you, we will endeavor to provide you with notice in advance of such change by highlighting the change on our Site.