

KARAT PRIVACY POLICY

Last Updated: July 8, 2024

At Karat, Inc. (“**Karat**”), we take your privacy seriously. Please read this Privacy Policy to learn how we process your personal information, which is defined as any information that identifies you (“**Personal Information**” or “**Personal Data**”). By using or accessing our services, including our websites and platform (collectively, “**Services**”), you are accepting the practices described in this Privacy Policy and consenting to our collection, use and disclosure of your Personal Information as described herein.

This Privacy Policy does not cover the privacy practices of websites, applications and services of organizations we do not own or control or people we do not manage (“**Third Party Services**”), even if such Third Party Services may be accessed through links in our Services. Furthermore, if you are a Karat employee, contractor, or job applicant, this Privacy Policy does not apply to your interactions with Karat; please refer to Karat’s privacy notice for employees and contractors for information about Karat’s privacy practices applicable to you.

You may print a copy of this Privacy Policy by clicking [here](#). If you have a disability, you may access this Privacy Policy in an alternative format by contacting privacy@karat.com.

1. HOW WE COLLECT INFORMATION

We may collect information about you by the following means:

- Directly from you, when you provide information to us or interact with us;
- Automatically when you utilize or interact with our website or Services;
- From online advertising companies who may provide information about the marketing and advertisements you have seen or clicked on, and from social media platforms and other sources of publicly available data;
- From other third party sources that provide consumer data, such as information about your interests, demographic information, and marketing inferences.
- From the Prospective Employer (as defined below) or other third party that referred you, if you are a job candidate or interviewee (“**Candidate**”).

2. WHAT INFORMATION WE COLLECT

Candidates

We may collect the following information from Candidates:

Category of Personal Data	Examples of Personal Data We Collect	Categories of Third Parties to Which We Disclose Personal Data
Profile or Contact Data	<ul style="list-style-type: none">● First and last name● Email● Phone number● Mailing Address● Pronouns	<ul style="list-style-type: none">● Service Providers● Prospective Employers● Interested Employers
Device/IP Data	<ul style="list-style-type: none">● IP address● Type of device/operating system/browser used to access the Services	<ul style="list-style-type: none">● Service Providers● Analytics Partners
Web Analytics	<ul style="list-style-type: none">● Web page interactions● Referring webpage/source through which you accessed the Services● Non-identifiable request IDs	<ul style="list-style-type: none">● Service Providers● Analytics Partners

	<ul style="list-style-type: none"> ● Statistics associated with the interaction between device or browser and the Services 	
Social Media Data	<ul style="list-style-type: none"> ● User name on the social media platform ● Information from your social media profile 	<ul style="list-style-type: none"> ● Service Providers ● Prospective Employers ● Interested Employers
Demographic Data	<ul style="list-style-type: none"> ● Gender ● Race ● Ethnicity ● Disability status 	<ul style="list-style-type: none"> ● Service Providers ● Prospective Employers ● Interested Employers
Professional or Employment-Related Data	<ul style="list-style-type: none"> ● Resume ● Job title ● Job history ● Karat's performance evaluations 	<ul style="list-style-type: none"> ● Service Providers ● Prospective Employers ● Interested Employers
Geolocation Data	<ul style="list-style-type: none"> ● IP-address-based location information 	<ul style="list-style-type: none"> ● Service Providers
Photos, Videos, and Recordings	<ul style="list-style-type: none"> ● If you participate in a technical interview, photos, videos and/or audio recordings of you 	<ul style="list-style-type: none"> ● Service Providers ● Prospective Employers ● Interested Employers
Inferences Drawn from Other Personal Data Collected	<ul style="list-style-type: none"> ● Profiles reflecting your performance during Karat interviews and our assessment of your performance 	<ul style="list-style-type: none"> ● Service Providers ● Prospective Employers ● Interested Employers
Other Identifying Information that You Voluntarily Choose to Provide	<ul style="list-style-type: none"> ● Identifying information in emails or messages you send us 	<ul style="list-style-type: none"> ● Service Providers

Website Visitors and Prospective Customers

We may collect the following from website visitors and prospective customers:

Category of Personal Data	Examples of Personal Data We Collect	Categories of Third Parties to Which We Share this Personal Data
Profile or Contact Data	<ul style="list-style-type: none"> ● First and last name ● Email ● Phone number ● Mailing address 	<ul style="list-style-type: none"> ● Service Providers
Device/IP Data	<ul style="list-style-type: none"> ● IP address ● Type of device/operating system/browser used to access the Services 	<ul style="list-style-type: none"> ● Service Providers ● Analytics Partners
Web Analytics	<ul style="list-style-type: none"> ● Web page interactions ● Referring webpage/source through which you accessed the Services ● Non-identifiable request IDs ● Statistics associated with the interaction between device or browser and the Services 	<ul style="list-style-type: none"> ● Service Providers ● Analytics Partners
Social Media Data	<ul style="list-style-type: none"> ● User name on the social media platform ● Information from your social media profile 	<ul style="list-style-type: none"> ● Service Providers
Geolocation Data	<ul style="list-style-type: none"> ● IP-address-based location information 	<ul style="list-style-type: none"> ● Service Providers

		<ul style="list-style-type: none"> ● Analytics Partners
Other Identifying Information that You Voluntarily Choose to Provide	<ul style="list-style-type: none"> ● Identifying information in emails or messages you send us 	<ul style="list-style-type: none"> ● Service Providers

3. HOW WE USE YOUR INFORMATION

- **Providing, Customizing and Improving the Services**
 - Creating and managing your account or other user profiles.
 - Providing you with the products, services or information you request.
 - Meeting or fulfilling the reason you provided the information to us.
 - Providing support and assistance for the Services.
 - Improving the Services, including testing, research, internal analytics, comparative assessments and benchmarking, and product development.
 - Personalizing the Services, website content and communications based on your preferences.
 - Processing your information to determine eligibility for certain product features, offerings, and other opportunities provided by Karat or other third parties.
 - Conducting cheat detection, fraud prevention, security measures and debugging.
 - Carrying out other business purposes stated when collecting your Personal Data or as otherwise set forth in applicable data privacy laws.
- **Marketing the Services**
 - Sending you marketing emails.
 - Showing you advertisements, including interest-based or online behavioral advertising.
- **Corresponding with You**
 - Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about Karat or the Services.
 - Sending emails and other communications according to your preferences or that display content and certain product features, offerings, and other opportunities that we think will interest you.
 - Providing you with support, feedback, and opportunities for you to provide us with feedback regarding Karat or the Services.
- **Meeting Legal Requirements and Enforcing Legal Terms**
 - Fulfilling our legal obligations under applicable law, regulation, court order or other legal process, including preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.
 - Responding to lawful requests by public authorities including requests related to national security or law enforcement requirements.
 - Protecting the rights, property or safety of you, Karat or another party.
 - Enforcing any agreements with you.
 - Responding to claims that any posting or other content violates third-party rights.
 - Resolving disputes.

Data That Is Not Personal Data

We may create aggregated, de-identified or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified or anonymized data and disclose it to third parties for our lawful business purposes, including to analyze, build and improve the Services and promote Karat (including marketing and producing white papers and other publications relating to the Services), provided that we will not disclose such data in a manner that could identify you.

4. TO WHOM WE DISCLOSE YOUR INFORMATION

We may disclose your information to the following third parties. In all such circumstances, we remain liable to you for processing your Personal Data in compliance with this Privacy Policy.

- **Service Providers.** “Service Providers” means parties that help us provide the Services or perform business functions on our behalf. They include:
 - Hosting, technology and communication providers.
 - Security and fraud prevention providers.
 - Support and customer service vendors.
- **Advertising Partners.** “Advertising Partners” means parties that help us market our services and provide you with other offers related to Karat, such as our Services and new products and features, that may be of interest to you. We may disclose the Personal Data of Website Visitors to ad networks for such purposes.
- **Analytics Partners.** “Analytics Partners” means parties that provide analytics on web traffic or usage of the Services. They include:
 - Companies that track how users found or were referred to the Services.
 - Companies that track how users interact with the Services.
- **Prospective Employers.** “Prospective Employer” means the employer or organization that referred you to Karat for an interview. We may disclose certain of your Personal Data, including our assessment of any interviews you complete with Karat and recordings of the interviews, with the Prospective Employer.
- **Interested Employers.** “Interested Employer” means a third party seeking job candidates via Karat. When you consent to participate in certain product features, offerings, and other opportunities with Karat and/or certain Interested Employers, we may disclose certain of your Personal Data, including your contact details, your resume, our assessment of any technical interviews you complete with Karat, recordings of the interviews and any other information to Interested Employers that you approve.
- **Legal.** We may disclose any Personal Data that we collect to third parties in conjunction with any of the activities set forth under “Meeting Legal Requirements and Enforcing Legal Terms” in the “How We Use Your Information” section above.
- **Corporate Event.** All of your Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part). Should one of these events occur, we will make reasonable efforts to notify you before your information becomes subject to different privacy and security policies and practices.

5. HOW WE PROTECT AND STORE YOUR INFORMATION

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, organizational, and administrative security measures based on the type of Personal Data and methods of processing. Although we take reasonable steps designed to protect your Personal Data, no method of transmitting data over the internet or storing data is completely secure.

We retain Personal Data about you for as long as you have an open account with us or as otherwise necessary to provide you with our Services. In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law.

6. HOW TO CONTROL YOUR PRIVACY OPTIONS

Email Marketing

If at any time you no longer wish to receive marketing communications from us, you can click the unsubscribe link at the bottom of any email or email us at privacy@karat.com.

Online Activity Tracking

Our Services use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “Cookies”) to enable our servers to recognize your web browser, tell us how and when you visit our website and use our Services. Cookies are small pieces of data placed on your computer, tablet, phone or similar device when you use that device to access our Services. We may also supplement the information we collect from you with information received

from third parties, including third parties that have placed their own Cookies on your devices. Please note that because of our use of Cookies, the Services do not support “Do Not Track” requests sent from a browser at this time. We use the following types of Cookies:

- **Strictly Necessary Cookies** are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Services. Disabling these Cookies may make certain features and services unavailable.
- **Performance Cookies** allow us to understand how visitors use our Services. They do this by collecting information about the number of visitors to the Services, what pages visitors view on our Services and how long visitors are viewing pages on the Services. Performance Cookies also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and the Services’ content for those who engage with our advertising. For example, Google uses cookies in connection with its Google Analytics services. Google’s ability to use and disclose information collected by Google Analytics about your visits to the Services is subject to the Google Analytics Terms of Use and the Google Privacy Policy. You have the option to opt-out of Google’s use of Cookies by visiting the Google advertising opt-out page at www.google.com/privacy_ads.html or the Google Analytics Opt-out Browser Add-on at <https://tools.google.com/dlpage/gaoptout/>.
- **Targeting Cookies** collect data about your online activity and identify your interests so that we can provide advertising that we believe is relevant to you. For example, we use Google retargeting/advertising cookies, as well as those provided by other vendors. For more information about this, please see the section below titled “Interest-Based Advertisements.”

You can decide whether to accept Cookies through your internet browser’s settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our website and some of the Services and functionalities may not work.

To explore what Cookie settings are available to you or to modify your preferences with respect to Cookies, you can access your Cookie management settings by clicking Cookie Settings below or by looking in the “preferences” or “options” section of your browser’s menu. To find out more information about Cookies generally, including information about how to manage and delete Cookies, please visit <http://www.allaboutcookies.org/> or <https://ico.org.uk/for-the-public/online/cookies/>.

Interest-Based Advertisements

We may serve advertisements, and also allow third-party ad networks, including third-party ad servers, ad agencies, ad technology vendors and research firms, to serve advertisements through the Services. These advertisements may be targeted to users who fit certain general profile categories or display certain preferences or behaviors (“**Interest-Based Ads**”). Information for Interest-Based Ads (including Personal Data) may be provided to us by you, or derived from the usage patterns of particular users on the Services and/or services of third parties. Such information may be gathered through tracking users’ activities across time and unaffiliated properties, including when you leave the Services. To accomplish this, we or our service providers may deliver Cookies, including a file (known as a “web beacon”) from an ad network to you through the Services. Web beacons allow ad networks to provide anonymized, aggregated auditing, research and reporting for us and for advertisers. Web beacons also enable ad networks to serve targeted advertisements to you when you visit other websites. Web beacons allow ad networks to view, edit or set their own Cookies on your browser, just as if you had requested a web page from their site.

Visit <http://www.networkadvertising.org> or <http://www.aboutads.info> to learn more about your options for opting out of interest-based advertising (or if located in the EEA, UK, or Switzerland, click [here](#)). Please note this does not opt you out of being served ads that are not targeted to you based on your online activity.

7. PERSONAL INFORMATION OF CHILDREN

We do not knowingly collect or solicit Personal Data about children under 16 years of age; if you are a child under the age of 16, please do not attempt to register for or otherwise use the Services or send us any Personal Data. If we learn we have collected Personal Data from a child under 16 years of age, we will delete that information as quickly as possible. If you believe that a child under 16 years of age may have provided Personal Data to us, please contact us at privacy@karat.com.

8. JURISDICTION-SPECIFIC NOTICES

US Residents

If you are a resident of certain US jurisdictions, including, but not limited to, the State of Nevada, California, Virginia, Colorado, Connecticut, Utah, you have the additional rights set forth in this section under applicable state law. Please see the “Exercising Your Rights” section below for instructions regarding how to exercise these rights.

- **Access:** You have the right to request certain information about our collection and use of your Personal Data over the past 12 months. If we have disclosed your Personal Data to any third parties for a business purpose over the past 12 months, we will identify the categories of Personal Data disclosed to each category of third party recipient. In response to your request, we will provide you with the following information:
 - The categories of Personal Data that we have collected about you.
 - The categories of sources from which that Personal Data was collected.
 - The business or commercial purpose for collecting Personal Data.
 - The categories of third parties to whom we have disclosed your Personal Data.
 - The specific pieces of Personal Data that we have collected about you.
- **Deletion:** You have the right to request that we delete the Personal Data that we have collected about you. Under the applicable laws, this right is subject to certain exceptions: for example, we may need to retain your Personal Data to prevent cheating or fraud, or provide you with the Services or complete a transaction or other action you have requested, or if deletion of your Personal Data involves disproportionate effort. If your deletion request is subject to one of these exceptions, we may deny your deletion request.
- **Correction or Rectification:** You have the right to request that we correct any inaccurate Personal Data we have collected about you. Under the applicable laws, this right is subject to certain exceptions: for example, if we decide, based on the totality of circumstances related to your Personal Data, that such data is correct. If your correction request is subject to one of these exceptions, we may deny your request.
- **Withdrawal of Consent:** If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may then have to provide express consent on a case-by-case basis for the use or disclosure of your Personal Data, if such use or disclosure is necessary to enable you to utilize some or all of our Services.
- **Portability:** You can ask for a copy of your Personal Data in machine-readable format. You can also request that we transmit the data to another controller where technically feasible.
- **Opt-Out of Certain Processing Activities:** You have the right to opt out of the processing of your Personal Data for targeted advertising and related analytics purposes. To opt-out of targeted advertising, please disable Targeting Cookies. To modify your preferences with respect to Cookies, you can access your Cookie management settings by clicking Cookie Settings below. You also have the right to opt out from the processing of your Personal Data for the purposes of profiling in furtherance of decisions that produce legal or similarly significant effects to you, if applicable.

We will not discriminate against you for exercising your rights. We will not deny you our goods or services, charge you different prices or rates, or provide you a lower quality of goods and services if you exercise your rights. However, we may offer different tiers of our Services as allowed by applicable data privacy laws with varying prices, rates or levels of quality of the goods or services you receive related to the value of Personal Data that we receive from you.

Additional Information for California Residents

If you are a California resident, the California Consumer Privacy Act (“**CCPA**”) requires us to provide you with information about:

- the purpose for which we use each category of “personal information” (as defined in the CCPA) we collect; and
- the categories of third parties to which we (a) disclose such personal information for a business purpose, (b) “share” personal information for “cross-context behavioral advertising,” and/or (c) “sell” such personal information.

Under the CCPA, “sharing” is defined as the targeting of advertising to a consumer based on that consumer’s personal information obtained from the consumer’s activity across distinct online services, and “selling” is defined as the disclosure of personal information to third parties in exchange for monetary or other valuable consideration. As discussed above in the Privacy Policy, we “share” information with our advertising partners to provide more relevant and tailored advertising to you regarding our Services. Moreover, our use of third-party analytics services and online advertising services may result in the sharing of online identifiers (e.g., IP addresses and device identifiers in a way that may be considered a “sale” under the CCPA.

For more information about each category, purpose of use, and the third parties to which we disclose information, please see the “What Information We Collect,” “How We Use Your Information,” and “To Whom We Disclose Your Information” sections above.

Your Choices Regarding “Sharing” and “Selling”: You have the right to opt out of our sale/sharing of your personal information for purposes of online analytics and advertising by changing your Cookie Settings by clicking below.

Other CCPA and California rights:

- Financial incentives. If we offer any financial incentives in exchange for your personal information (e.g., discount coupons in exchange for your email address), we will provide you with appropriate information about such incentives so that you can make an informed decision as to whether to participate.
- Right to Limit. The CCPA allows you to limit the use or disclosure of your “sensitive personal information” (as defined in the CCPA) if your sensitive personal information is used for certain purposes. Please note that we do not use or disclose sensitive personal information other than for business purposes for which you cannot opt out under the CCPA.
- Retention of Your Personal Information. Please see the “Security and retention of your information” section above.
- Do Not Track (“DNT”). DNT is a privacy preference that users can set in certain web browsers. DNT is a way for users to inform websites and services that they do not want certain information about their webpage visits collected over time and across websites or online services. Except as otherwise described herein with respect to legally required browser-based opt outs, we do not recognize or respond to browser-initiated DNT signals, as there is no industry-wide framework for DNT signals. Learn more about **Do Not Track**.

European Residents (including residents of the UK, Switzerland, Lichtenstein, Norway and Iceland)

If you are a resident of the European Union (“**EU**”), United Kingdom (“**UK**”), Switzerland, Lichtenstein, Norway or Iceland, you may have additional rights under the EU General Data Protection Regulation and UK General Data Protection Regulation (collectively, “**GDPR**”) or applicable Swiss data protection law with respect to your Personal Data, as outlined below. Karat will be the controller of your Personal Data processed in connection with the Services. If there are any conflicts between this section and any other provision of this Privacy Policy, the policy or portion that is more protective of Personal Data shall control to the extent of such conflict.

- Personal Data We Collect: The “What Information We Collect” section above details the Personal Data that we collect from you.

- **Personal Data Use and Processing Grounds:** The “How We Use Your Information” section above explains how we use your Personal Data. We will only process your Personal Data if we have a lawful basis for doing so. Lawful bases for processing include the following:
 - **Contractual Necessity (Solely with respect to Candidate’s Personal Data):** We process the following categories of Personal Data as a matter of “contractual necessity,” meaning that we need to process the data to perform our obligations under our contract with you. When we process data due to contractual necessity, failure to provide Personal Data may make certain features of the Service inaccessible to you.
 - Profile or Contact Data
 - Professional or Employment-Related Data
 - Photos, Videos, and Recordings
 - Inferences Drawn from other Personal Data Collected
 - **Legitimate Interest:** We process the following categories of Personal Data when we believe it furthers the legitimate interest of us or third parties (as described in the “How We Use Your Information” section above):
 - Profile or Contact Data
 - Device/IP Data
 - Web Analytics
 - Social Media Data
 - Geolocation Data
 - Demographic Data
 - Other Identifying Information You Voluntarily Choose to Provide

We may also de-identify or anonymize Personal Data to further our legitimate interests.
 - **Consent:** In some cases, we process Personal Data based on the consent you expressly grant to us at the time we collect such data. When we process Personal Data based on your consent, it will be expressly indicated to you at the point and time of collection.
 - **Other Processing Grounds:** From time to time we may also need to process Personal Data to comply with a legal obligation, if it is necessary to protect the vital interests of you or other data subjects, or if it is necessary for a task carried out in the public interest.
- **Sharing Personal Data:** The “How We Share Your Personal Data” section above details how we disclose your Personal Data to third parties.
- **Data Subject Rights:** You have certain rights with respect to your Personal Data, including those set forth below.
 - **Access:** You can request more information about the Personal Data we hold about you and request a copy of such Personal Data.
 - **Rectification:** If you believe that any Personal Data we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data.
 - **Erasure:** You can request that we erase some or all of your Personal Data from our systems.
 - **Withdrawal of Consent:** If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the use or disclosure of certain of your Personal Data, if such use or disclosure is necessary to enable you to utilize some or all of our Services.
 - **Portability:** You can ask for a copy of your Personal Data in a machine-readable format. You can also request that we transmit the data to another controller where technically feasible.
 - **Objection:** You can contact us to let us know that you object to the further use or disclosure of your Personal Data for certain purposes, such as for direct marketing purposes.
 - **Restriction of Processing:** You can ask us to restrict further processing of your Personal Data.
- **Right to File Complaint:** You have the right to lodge a complaint about Karat's practices with respect to your Personal Data with the supervisory authority of your country or EU Member State. A list of Supervisory Authorities is available here: https://edpb.europa.eu/about-edpb/board/members_en.

Exercising Your Rights

To exercise the rights described above, you or your Authorized Agent (defined below) must send us a request that (1) provides sufficient information to allow us to verify that you are the person about whom we have collected Personal Data and (2) describes your request in sufficient detail to allow us to understand, evaluate and respond to it. We may not respond to requests that do not meet these criteria. In some circumstances, we may not be able to fully comply with your request, such as if it is frivolous, if it jeopardizes the rights of others, or if it is not required by law, but we will still respond to notify you of such a decision. In some cases, we may also need you to provide us with additional information, which may include Personal Data, if necessary to verify your identity and the nature of your request. We will work to respond to valid requests within the time period required by applicable law. If we determine that your request warrants a fee, we will notify you of the fee and explain that decision before completing your request. You may submit a request by emailing us at privacy@karat.com.

You may also authorize an agent (an “**Authorized Agent**”) to exercise your rights on your behalf. To do this, you must provide your Authorized Agent with written permission to exercise your rights on your behalf, and we may request a copy of this written permission from your Authorized Agent when they make a request on your behalf.

9. INTERNATIONAL TRANSFERS

The Personal Information that we collect may be transferred to, and stored at, a location outside of your jurisdiction, including outside the European Economic Area (the “**EEA**”) and the UK, and in countries that are not subject to an adequacy decision by the European Commission and that may not provide for the same level of data protection as your jurisdiction. It may also be processed by staff operating outside of your jurisdiction who work for us in connection with the activities outlined in this Privacy Policy. More specifically, Karat is located in the United States and operates globally; we currently utilize data centers in the United States. The laws in the United States regarding Personal Information may be different from the laws of your jurisdiction or country. Any international transfers, collection, storage, or processing of your Personal Information will comply with safeguards as required by relevant law.

Data Privacy Framework

Karat also complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Karat has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF. Karat has certified to the U.S. Department of Commerce that it adheres to the UK Extension to the EU-U.S. Data Privacy Framework Principles with regard to the processing of personal data received from the UK in reliance on the UK Extension to the EU-U.S. DPF. In addition, Karat has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles, the UK Extension to the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. As a part of our compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, we are subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC). To learn more about the Data Privacy Framework program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, we commit to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF to JAMS, an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit <https://www.jamsadr.com/dpf-dispute-resolution> for more information or to file a complaint. The services of JAMS are provided at no cost to you. If your complaint still is not resolved through the above channels, under limited circumstances, an additional binding arbitration option may be available before a DPF panel, as described at <https://www.dataprivacyframework.gov/s/>.

10. HOW WE UPDATE THIS PRIVACY POLICY

We may update this Privacy Policy from time to time. We will alert you to any such changes by placing a notice on the Karat website, by sending you an email and/or by other legally-binding means. Your continued use of the Services following these changes reflects your acceptance of the revised Privacy Policy. The processing of your Personal Information is subject to the Privacy Policy in effect at the time such information is collected.

11. HOW TO CONTACT KARAT

For questions about our privacy practices, please contact us as follows:

- **Karat, Inc.**
Attn: Legal Department – Privacy
1414 NE 42nd St, Ste 204
Seattle, WA 98105-6271 USA
privacy@karat.com
+1 (509) 761-9141

If you are located in the EU or UK, you may also contact the following:

- **Data Protection Officer**
Dr. Felix Wittern
privacy@karat.com
Fieldfisher Tech Rechtsanwaltsgesellschaft mbH, Am Sandtorkai 68, 20457 Hamburg, Germany
- **EU Member Representative:**
Karat@LionheartSquared.eu
Lionheart Squared (Europe) Ltd, 2 Pembroke House, Upper Pembroke Street 28-32, Dublin
D02 EK84, Republic of Ireland
- **UK Member Representative:**
Karat@LionheartSquared.co.uk
Lionheart Squared Limited, Attn: Data Privacy, 17 Glasshouse Studios, Fryern Court Road, Fordingbridge,
Hampshire, SP6 1QX, United Kingdom

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