

Rutter Privacy Notice

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LANGAPI Company (d.b.a. Rutter) and its subsidiaries (collectively, “Rutter”, “we”, “our”, and “us”) empowers innovators (“Developers”) by delivering access to the E-commerce ecosystem through Rutter technology. This Privacy Policy is designed to help you understand how we collect, use, process, and share your personal information and to help you understand and exercise your privacy rights.

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1. SCOPE

This Privacy Policy applies to personal information processed by us, including on any websites, and other online or offline offerings that we may make available to you, including www.rutterapi.com. To make this Privacy Policy easier to read, our websites, mobile applications, and other offerings are collectively called “**Services.**”

An Important Note: This Privacy Policy does not apply to any of the personal information that our customers may collect and process using Rutter’s Services (“**Customer Data**”). Our customers’ respective privacy policies govern their collection and use of Customer Data. Our processing of Customer Data is governed by the contracts that we have in place with our customers, not this Privacy Policy. Any questions or requests relating to Customer Data should be directed to our customer.

2. PERSONAL INFORMATION WE COLLECT

The categories of personal information we collect depend on how you interact with us, our Services, and the requirements of applicable law. We collect information that you provide to us, information we obtain automatically when you use our Services, and information from other sources such as third-party services and organizations, as described below.

We do not generally require you to disclose any sensitive information (e.g., details of race, religious belief, sexual orientation or membership of a trade union) to us. If you do provide us with sensitive information for any reason, you consent to us collecting that information and using and disclosing that information for the purpose for which you disclosed it to us and as permitted by the *Australian Privacy Act 1988* (Cth) (“**Privacy Act**”) and other relevant laws.

A. Information You Provide to Us Directly

We may collect the following personal information that you provide to us.

- **Account Creation.** We may collect information when you create an account, such as first and last name, work email address, and phone number
- **Connecting your Ecommerce Store.** When you connect your ecommerce store via our Services, we collect login information required by the provider of your account, such as your username and password or a security token. In some cases, we also collect your phone number, email address, security questions and answers and on-time passwords to help verify your identity before connecting your accounts.
- **Your Merchant Accounts.** When you use our Services, we receive information from your financial product and service providers that maintain your merchant accounts, including names, addresses, email addresses, last four digits of bank accounts, product information (such as product names and images), and order information (such as line items, shipping information such as names and addresses, and transactions details for the order).
- **Purchases.** We may collect personal information and details associated with your purchases, including payment information. Any payments made via our Services are processed by third-party payment processors. We do not directly collect or store any payment card information entered through our Services, but we may receive information associated with your payment card information (e.g., your billing details).
- **Your Communications with Us.** We may collect personal information, such as email address, phone number, or mailing address when you request information about our Services, register for our newsletter or loyalty program, request customer or technical support, apply for a job, or otherwise communicate with us.
- **Interactive Features.** We and others who use our Services may collect personal information that you submit or make available through our interactive features (e.g., product reviews or responses to reviews). Any information you provide using the public sharing features of the Services (referred to herein as “**User Content**”) will be considered “public,” unless otherwise required by applicable law, and is not subject to the privacy protections referenced herein. Please exercise caution before revealing any information that may identify you in the real world to other users.
- **Conferences, Trade Shows, and Other Events.** We may collect personal information from individuals when we attend or host conferences, trade shows, and other events.
- **Business Development and Strategic Partnerships.** We may collect personal information from individuals and third parties to assess and pursue potential business opportunities.
- **Job Applications.** We may post job openings and opportunities on our Services. If you reply to one of these postings by submitting your application, CV and/or cover letter to us, we will collect and use this information to assess your qualifications.

B. Information Collected Automatically

We may collect personal information automatically when you use our Services:

- **Automatic Data Collection.** We may collect certain information automatically when you use our Services, such as your Internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, browser or device information, location information (including approximate location derived from IP address), and Internet service provider. We may also automatically collect information regarding your use of our Services, such as pages that you visit before, during and after using our Services, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Services.
- **Cookies, Pixel Tags/Web Beacons, and Other Technologies.** We, as well as third parties that provide content, advertising, or other functionality on our Services, may use cookies, pixel tags, local storage, and other technologies (“**Technologies**”) to automatically collect information through your use of our Services. Where required by law, the use of such Technologies is subject to your consent.
 - **Cookies.** Cookies are small text files placed in device browsers that store preferences and facilitate and enhance your experience.
 - **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded in our Services that collects information about engagement on our Services. The use of a pixel tag allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted on, or forwarded.

Our uses of these Technologies fall into the following general categories:

- **Operationally Necessary.** This includes Technologies that allow you access to our Services, applications, and tools that are required to identify irregular website behavior, prevent fraudulent activity, improve security, or allow you to make use of our functionality;

See “[Your Privacy Choices and Rights](#)” below to understand your choices regarding these Technologies.

For more information about the specific providers of the Targeting and Analytics cookies used on Rutter’s Services and how to opt out of these cookies, please see “Cookies and Tracking Technologies” table and “Analytics” below.

C. Information Collected from Other Sources

We may obtain information about you from other sources, including through third-party services and organizations. For example, if you access our Services through a third-party application, such as an app store, a third-party login service, or a social networking site, we may collect information about you from that third-party application that you have made available via your privacy settings.

Referrals and Sharing Features. We may collect information that other people provide about you when they use our Services.

3. HOW WE USE YOUR INFORMATION

We use your information for a variety of business purposes, including to provide our Services, for administrative purposes, and to market our products and Services, as described below.

A. Provide Our Services

We use your information to fulfil our contract with you and provide you with our Services, such as:

- Managing your information and accounts;
- Providing access to certain areas, functionalities, and features of our Services;
- Answering requests for customer or technical support;
- Communicating with you about your account, activities on our Services, and policy changes;
- Processing your financial information and other payment methods for products or Services purchased;
- Processing applications if you apply for a job we post on our Services; and
- Allowing you to register for events.

B. Administrative Purposes

We use your information for various administrative purposes, such as:

- Pursuing our legitimate interests such as direct marketing, research and development (including marketing research), network and information security, and fraud prevention;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity;
- Measuring interest and engagement in our Services;
- Short-term, transient use, such as contextual customization of ads;
- Improving, upgrading, or enhancing our Services;
- Developing new products and Services;
- Ensuring internal quality control and safety;
- Authenticating and verifying individual identities, including requests to exercise your rights under this policy;
- Debugging to identify and repair errors with our Services;
- Auditing relating to interactions, transactions, and other compliance activities;
- Sharing information with third parties as needed to provide the Services;
- Enforcing our agreements and policies; and
- Other uses as required to comply with our legal obligations.

C. Marketing and Advertising our Products and Services

We may use personal information to tailor and provide you with content and advertisements. We may provide you with these materials as permitted by applicable law. Some of the ways we market to you include email campaigns, **and** custom audiences advertising, **and** “interest-based” advertising.

For Australia, we will only use and disclose your personal information for the purposes of marketing our Services or services of third party organizations where you have consented to us doing so, or as otherwise permitted by law.

If you have any questions about our marketing practices, or if you would like to opt out of the use of your personal information for marketing purposes, you may contact us at any time as set forth in “[Contact Us](#)” below.

D. Other Purposes

We also use your information for other purposes as requested by you or as permitted by applicable law.

- **Consent.** We may use personal information for other purposes that are clearly disclosed to you at the time you provide personal information or with your consent.
- **De-identified and Aggregated Information.** We may use personal information and other information about you to create de-identified and/or aggregated information, such as de-identified demographic information, de-identified location information, information about the device from which you access our Services, or other analyses we create. If we create or receive personal data that has been de-identified or aggregated, we will not attempt to reidentify it, except to comply with applicable law.
- **Inferences.** We may use the information we collect about you to derive inferences. For example, we may infer your location or your projected income based on the information we collect about you from third party sources.

4. HOW WE DISCLOSE YOUR INFORMATION

We disclose your information to third parties for a variety of business purposes, including to provide our Services, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

A. Disclosures to Provide our Services

The categories of third parties with whom we may share your information are described below.

- **Developer.** We may share your personal information with the developer of the application you are using as directed by the developer.
- **Service Providers.** We may share your personal information with our third-party service providers who use that information to help us provide our Services. This includes service providers that provide us with IT support, hosting, payment processing, customer service, and related services.
- **Business Partners.** We may share your personal information with business partners to provide you with a product or service you have requested. We may also share your personal information to business partners with whom we jointly offer products or services.
- **Affiliates.** We may share your personal information with our company affiliates for our administrative purposes, including activities such as IT management, for them to provide services to you or support and supplement the Services we provide.
- **Advertising Partners.** We may share your personal information with third-party advertising partners. These third-party advertising partners may set Technologies and other tracking tools on our Services to collect information regarding your activities and your device (e.g., your IP address, cookie identifiers, page(s) visited, location, time of day). These advertising partners may use this information (and similar information collected from other services) for purposes of delivering personalized advertisements to you when you visit digital properties within their networks. This practice is commonly referred to as “interest-based advertising” or “personalized advertising.”

- **APIs/SDKs.** We may use third-party Application Program Interfaces (“**APIs**”) and Software Development Kits (“**SDKs**”) as part of the functionality of our Services. For more information about our use of APIs and SDKs, please contact us as set forth in “[Contact Us](#)” below.

B. Disclosures to Protect Us or Others

We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our, or others’ rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

C. Disclosure in the Event of Merger, Sale, or Other Asset Transfers

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, your information may be sold or transferred as part of such a transaction, as permitted by law and/or contract.

5. YOUR PRIVACY CHOICES AND RIGHTS

Your Privacy Choices. The privacy choices you may have about your personal information are determined by applicable law and are described below.

- **Email and Telephone Communications.** If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails regarding products or Services you have requested. We may also send you certain non-promotional communications regarding us and our Services, and you will not be able to opt out of those communications (e.g., communications regarding our Services or updates to our Terms or this Privacy Policy).

We process requests to be placed on do-not-mail, do-not-phone, and do-not-contact lists as required by applicable law.

- **Text Messages.** You may opt out of receiving text messages from us by following the instructions in the text message you have received from us or by otherwise contacting us.
- **Mobile Devices.** We may send you push notifications through our mobile application. You may opt out from receiving these push notifications by changing the settings on your mobile device. With your consent, we may also collect precise location-based information via our mobile application. You may opt out of this collection by changing the settings on your mobile device.
- **“Do Not Track.”** Do Not Track (“**DNT**”) is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.
- **Cookies and Interest-Based Advertising.** You may stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as your browser or device permits. However, if you adjust your preferences, our Services may not work properly. Please note that cookie-based opt-outs are not effective on mobile applications. However, you may opt-out of personalized advertisements on some mobile applications by following the instructions for [Android](#), [iOS](#), and [others](#).

The online advertising industry also provides websites from which you may opt out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory programs. You can access these and learn more about targeted advertising and consumer choice and privacy by visiting the [Network Advertising Initiative](#), [the Digital Advertising Alliance](#), and [the European Digital Advertising Alliance](#)..

Please note you must separately opt out in each browser and on each device.

Your Privacy Rights. In accordance with applicable law, you may have the right to:

- **Access Personal Information** about you, including: (i) confirming whether we are processing your personal information; (ii) obtaining access to or a copy of your personal information;
- **Request Correction** of your personal information where it is inaccurate, incomplete or outdated. In some cases, we may provide self-service tools that enable you to update your personal information;
- **Request Deletion, Anonymization or Blocking** of your personal information when processing is based on your consent or when processing is unnecessary, excessive or noncompliant;
- **Request Restriction of or Object to** our processing of your personal information when processing is noncompliant;
- **Withdraw your Consent** to our processing of your personal information. If you refrain from providing personal information or withdraw your consent to processing, some features of our Service may not be available;
- **Request data portability and receive an electronic copy of personal information that you have provided to us;**
- **Be informed** about third parties with which your personal information has been shared; and
- **Request the review of decisions taken exclusively based on automated processing** if these decisions could affect your data subject rights.

If you would like to exercise any of these rights, please contact us as set forth in “[Contact Us](#)” below. We will process such requests in accordance with applicable laws.

6. SECURITY OF YOUR INFORMATION

We take steps to ensure that your information is treated securely and in accordance with this Privacy Policy. Unfortunately, no system is 100% secure, and we cannot ensure or warrant the security of any information you provide to us. We have taken appropriate safeguards to require that your personal information will remain protected, and take steps to require our third-party service providers and partners to have appropriate safeguards as well. To the fullest extent permitted by applicable law, we do not accept liability for unauthorized disclosure.

By using our Services or providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of our Services. If we learn of a security system’s breach, we may attempt to notify you electronically by posting a notice on our Services, by mail, or by sending an email to you.

7. INTERNATIONAL DATA TRANSFERS

All information processed by us may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States or other countries, which may have data protection laws that are different from the laws where you live. We endeavor to safeguard your information consistent with the requirements of applicable laws.

For Australian users, except in some cases where we may rely on an exception under the Privacy Act, we will take reasonable steps to ensure that such overseas recipients do not breach the Australian Privacy Principles in the Privacy Act in relation to such information.

8. RETENTION OF PERSONAL INFORMATION

We store the personal information we collect as described in this Privacy Policy for as long as you use our Services, or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

9. SUPPLEMENTAL NOTICE FOR CALIFORNIA RESIDENTS

This Supplemental Notice for California Residents only applies to our processing of personal information that is subject to the California Consumer Privacy Act of 2018 (“CCPA”). The CCPA provides California residents with the right to know what categories of personal information Rutter has collected about them, and whether Rutter disclosed that personal information for a business purpose (e.g., to a service provider) in the preceding 12 months. California residents can find this information below:

Category of Personal Information Collected by Rutter	Category of Third Parties Information is Disclosed to for a Business Purpose
Identifiers. A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, or other similar identifiers.	<ul style="list-style-type: none">• Advertising networks• Internet service providers• Data analytics providers• Government entities• Operating systems and platforms• Social networks• Consumer data resellers• Service providers
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) A 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. Personal Information does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records. Note: Some personal information included in this category may overlap with other categories.	<ul style="list-style-type: none">• Advertising networks• Internet service providers• Data analytics providers• Government entities• Operating systems and platforms• Social networks• Consumer data resellers• Service providers

Category of Personal Information Collected by Rutter	Category of Third Parties Information is Disclosed to for a Business Purpose
<p>Protected classification characteristics under California or federal law Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</p>	<ul style="list-style-type: none"> • Advertising networks • Internet service providers • Data analytics providers • Government entities • Operating systems and platforms • Social networks • Consumer data resellers • Service providers
<p>Commercial information Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<ul style="list-style-type: none"> • Advertising networks • Internet service providers • Data analytics providers • Government entities • Operating systems and platforms • Social networks • Consumer data resellers • Service providers
<p>Internet or other electronic network activity Browsing history, search history, information on a consumer's interaction with an internet website, application, or advertisement.</p>	<ul style="list-style-type: none"> • Advertising networks • Internet service providers • Data analytics providers • Government entities • Operating systems and platforms • Social networks • Consumer data resellers • Service providers
<p>Geolocation data Physical location or movements.</p>	<ul style="list-style-type: none"> • Advertising networks • Internet service providers • Data analytics providers • Government entities • Operating systems and platforms • Social networks • Consumer data resellers • Service providers
<p>Sensory data Audio, electronic, visual, thermal, olfactory, or similar information.</p>	<ul style="list-style-type: none"> • Advertising networks • Internet service providers • Data analytics providers • Government entities • Operating systems and platforms • Social networks • Consumer data resellers • Service providers

Category of Personal Information Collected by Rutter	Category of Third Parties Information is Disclosed to for a Business Purpose
<p>Professional or employment-related information Current or past job history or performance evaluations.</p>	<ul style="list-style-type: none"> • Advertising networks • Internet service providers • Data analytics providers • Government entities • Operating systems and platforms • Social networks • Consumer data resellers • Service providers
<p>Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g, 34 C.F.R. Part 99)) Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.</p>	<ul style="list-style-type: none"> • Advertising networks • Internet service providers • Data analytics providers • Government entities • Operating systems and platforms • Social networks • Consumer data resellers • Service providers •
<p>Inferences drawn from other personal information to create a profile about a consumer Profile reflecting a consumer's location, projected income, preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p>	<ul style="list-style-type: none"> • Advertising networks • Internet service providers • Data analytics providers • Government entities • Operating systems and platforms • Social networks • Consumer data resellers • Service providers

The categories of sources from which we collect personal information and our business and commercial purposes for using personal information are set forth in [“Personal Information We Collect”](#) and [“How We Use Your Personal Information”](#) above, respectively.

“Sales” of Personal Information under the CCPA

For purposes of the CCPA, Rutter does not “sell” personal information, nor do we have actual knowledge of any “sale” of personal information of minors under 16 years of age, as the term “sell” is commonly understood. That said, we do share information with third-party advertisers for the purpose of promoting our Services. To the extent that such sharing is considered a “sale” under the CCPA, you may opt-out of

having your information shared by disabling third-party cookies on your device, or by contacting us as set forth in the “[Contact Us](#)” section below.

Additional Privacy Rights for California Residents

Non-Discrimination. California residents have the right not to receive discriminatory treatment by us for the exercise of their rights conferred by the CCPA.

Authorized Agent. Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. To designate an authorized agent, [please contact us as set forth in “[Contact Us](#)” below or at support@rutterapi.com and provide written authorization signed by you and your designated agent.

Verification. To protect your privacy, we will take the following steps to verify your identity before fulfilling your request. When you make a request, we will ask you to provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include asking you to answer questions regarding your account and use of our Services.

If you are a California resident and would like to exercise any of your rights under the CCPA, please contact us as set forth in “[Contact Us](#)” below. We will process such requests in accordance with applicable laws. **Accessibility.** This Privacy Policy uses industry-standard technologies and was developed in line with the World Wide Web Consortium’s Web Content Accessibility Guidelines, version 2.1. If you wish to print this policy, please do so from your web browser or by saving the page as a PDF.

California Shine the Light. The California “Shine the Light” law permits users who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed their personal information (if any) for their direct marketing purposes in the prior calendar year, as well as the type of personal information disclosed to those parties.

10. SUPPLEMENTAL NOTICE FOR NEVADA RESIDENTS

If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Information to third parties who intend to license or sell that Personal Information. You can exercise this right by contacting us at privacy@rutterapi.com with the subject line “Nevada Do Not Sell Request” and providing us with your name and the email address associated with your account. Please note that we do not currently sell your Personal Information as sales are defined in Nevada Revised Statutes Chapter 603A. If you have any questions, please contact us as set forth below.

11. CHILDREN’S INFORMATION

The Services are not directed to children under 13 (or other age as required by local law), and we do not knowingly collect personal information from children.

In Australia, if a user indicates they are under 15 and we are required to obtain the user’s consent (for example, for the collection of sensitive information), we will seek consent from the user’s parent or legal guardian.

If you are a parent or guardian and believe your child has uploaded personal information to our site without your consent, you may contact us as described in “[Contact Us](#)” below. If we become aware that a child has provided us with personal information in violation of applicable law, we will delete any personal information we have collected, unless we have a legal obligation to keep it.

12. OTHER PROVISIONS

Third-Party Websites/Applications. The Services may contain links to other websites/applications and other websites/applications may reference or link to our Services. These third-party services are not controlled by us. We encourage our users to read the privacy policies of each website and application with which they interact. We do not endorse, screen, or approve, and are not responsible for, the privacy practices or content of such other websites or applications. Providing personal information to third-party websites or applications is at your own risk.

Supervisory Authority. If you are located in the European Economic Area, Switzerland, the United Kingdom, or Brazil, you have the right to lodge a complaint with a supervisory authority if you believe our processing of your personal information violates applicable law.

If you are based in Australia and you are not satisfied with how Rutter has handled your data, you may wish to contact the Office of the Australian Information Commissioner.

Changes to our Privacy Policy. We may revise this Privacy Policy from time to time in our sole discretion. If there are any material changes to this Privacy Policy, we will notify you as required by applicable law. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you continue to use our Services after the new Privacy Policy takes effect.

13. CONTACT US

If you have any questions about our privacy practices or this Privacy Policy, or to exercise your rights as detailed in this Privacy Policy, please contact us at:

Rutter Inc.
Attn: Legal Department
609 Waller Street
San Francisco, CA 94117 U.S.A.
privacy@rutterapi.com