

PRIVACY POLICY

Last Updated: November 1, 2025

Effective Date: November 1, 2025

1. INTRODUCTION AND SCOPE

This Privacy Policy (“Policy”) describes how Willard AI LLC (“Company,” “we,” “our,” or “us”) collects, uses, shares, and protects personal information obtained from users (“you” or “your”) of the www.lobbyIQ.com website and any associated services, features, content, applications, or products (collectively, the “Services”).

By accessing or using our Services, you acknowledge that you have read, understood, and agree to be bound by this Privacy Policy. If you do not agree with our policies and practices, please do not use our Services.

This Policy applies to information we collect:

- On our website www.lobbyIQ.com;
- In email, text, and other electronic messages between you and our Services;
- Through mobile and desktop applications you download from our Services; and
- When you interact with our advertising and applications on third-party websites and services.

This Policy is provided in accordance with applicable laws, including Section 5 of the Federal Trade Commission Act (15 U.S.C. §45), which requires truthful disclosures and conspicuous posting of privacy practices.

2. INFORMATION WE COLLECT

2.1 Personal Information

We collect several types of information from and about users of our Services, including:

- **Identifiers and Contact Information:** Such as your name, email address, telephone number, postal address, and other similar identifiers.
- **Account Information:** Information that you provide when creating an account, including username and password.
- **Payment Information:** When you make purchases through our Services, our payment processor Stripe collects payment information on our behalf. We do not directly store your complete payment information.

- **Communications:** Records and copies of your correspondence with us, including email communications and support requests.

2.2 Methods of Collection

We collect this information:

- **Directly from you:** When you provide it to us through website forms, account registration, and other user input methods.
- **Automatically:** As you navigate through and interact with our Services, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns.
- **From third parties:** We may receive information about you from third parties, including business partners and service providers.

2.3 Automatic Information Collection

As you navigate through and interact with our Services, we may use automatic data collection technologies to collect certain information, including:

- **Usage Details:** Details of your visits to our Services, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Services.
- **Device Information:** Information about your computer, mobile device, internet connection, and operating system, including your device's unique device identifier, IP address, operating system, and browser type.
- **Location Information:** We may collect information about your actual location if you provide consent through your device settings.

3. HOW WE USE YOUR INFORMATION

We use information that we collect about you or that you provide to us, including any personal information:

3.1 Primary Business Purposes

- To present our Services and their contents to you;
- To provide you with information, products, or services that you request from us;
- To fulfill any other purpose for which you provide it;
- To provide you with notices about your account, including expiration and renewal notices;
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;

- To notify you about changes to our Services or any products or services we offer or provide through them.

3.2 Service Provision and Customer Support

- To process and complete transactions, and send you related information, including purchase confirmations and invoices;
- To respond to your inquiries and fulfill your requests, such as to send you requested materials and newsletters, as well as information and materials regarding our products and services;
- To send administrative information to you, such as information regarding the Services and changes to our terms, conditions, and policies.

3.3 Website Improvement and Analytics

- To improve our Services, products, marketing, and customer relationships and experiences;
- To conduct research and analysis, including focus groups and surveys, on our Services, products, and customer base;
- To measure or understand the effectiveness of the advertising we serve to you and others, and to deliver relevant advertising to you.

4. HOW WE SHARE YOUR INFORMATION

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction. We may disclose personal information that we collect or you provide as described in this Policy:

4.1 Service Providers and Business Partners

- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them. These may include:
 - Payment processors to process transactions
 - Cloud hosting providers to store our data
 - Analytics providers to help us understand website usage
 - Email service providers to send communications
 - Customer service providers to assist with support inquiries

4.2 Legal Requirements and Business Transfers

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request;
- To enforce or apply our terms of use and other agreements, including for billing and collection purposes;

- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers, or others;
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by the Company about our Services users is among the assets transferred.

4.3 No Sale of Personal Information

- We do not sell, rent, or lease your personal information to third parties.
- We do not share your personal information with third parties for their direct marketing purposes without your consent.

5. COOKIES AND TRACKING TECHNOLOGIES

5.1 Analytics Cookies Usage

We use cookies and similar tracking technologies to track the activity on our Services and hold certain information. Cookies are files with a small amount of data which may include an anonymous unique identifier. Specifically, we use:

- **Essential Cookies:** Necessary for the operation of our Services, such as cookies that enable you to log into secure areas.
- **Analytical/Performance Cookies:** Allow us to recognize and count the number of visitors and to see how visitors move around our Services when they are using it, helping us to improve the way our Services work.
- **Functionality Cookies:** Used to recognize you when you return to our Services, enabling us to personalize our content for you and remember your preferences.

5.2 Third-Party Tracking Technologies

Certain third parties may use cookies, web beacons, pixel tags, and similar technologies on our Services to collect information about your online activities over time and across different websites. These third parties may include:

- Google Analytics, which helps us analyze how users use our Services.
- Stripe, which processes payments and may use cookies for fraud prevention and security purposes.

5.3 User Control Options

Most web browsers allow you to control cookies through their settings preferences. However, if you limit the ability of websites to set cookies, you may worsen your overall user experience and/or lose access to certain features of our Services.

To opt out of Google Analytics tracking, you can install the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout>.

6. THIRD-PARTY SERVICES

6.1 Google Analytics Integration

We use Google Analytics, a web analytics service provided by Google, Inc. (“Google”). Google Analytics uses cookies to help us analyze how users use our Services. The information generated by the cookie about your use of our Services (including your IP address) may be transmitted to and stored by Google on servers in the United States. Google uses this information for the purpose of evaluating your use of our Services, compiling reports on website activity for us, and providing other services relating to website activity and internet usage.

Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google’s behalf. Google will not associate your IP address with any other data held by Google.

6.2 Stripe Payment Processing

We use Stripe as our payment processor. When you make a payment through our Services, you provide your payment information directly to Stripe. We do not store your full payment information. Stripe’s use of your personal information is governed by their privacy policy, which may be viewed at <https://stripe.com/privacy>.

6.3 Links to Third-Party Privacy Policies

Our Services may contain links to other websites not operated by us. If you click on a third-party link, you will be directed to that third party’s site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services. The inclusion of links to such websites does not imply an endorsement of the content on such websites.

7. DATA SECURITY

7.1 Security Measures Implementation

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. These measures include:

- Encryption of sensitive information during transmission;
- Secure server infrastructure with access controls;
- Regular security assessments and vulnerability testing;
- Employee training on data security practices;
- Physical security measures for our facilities.

All information you provide to us is stored on secure servers behind firewalls. Any payment transactions will be encrypted using SSL technology.

7.2 Breach Notification Procedures

In the event of a data breach that compromises your personal information, we will notify you and the appropriate authorities in accordance with applicable laws, including the Idaho Data Breach Notification Law (Idaho Code §28-51-105). Our notification will include:

- A description of the incident;
- The types of information involved;
- Steps we are taking to investigate and mitigate the breach;
- Measures you can take to protect yourself;
- Contact information for further inquiries.

7.3 Limitations of Security Guarantees

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Services. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Services.

8. YOUR PRIVACY RIGHTS

8.1 Access, Correction, and Deletion Rights

You have the right to:

- **Access:** Request access to your personal information that we maintain.
- **Correction:** Request that we correct inaccurate or incomplete personal information concerning you.
- **Deletion:** Request deletion of your personal information, subject to certain exceptions provided by law.
- **Restriction:** Request restriction of processing of your personal information.
- **Data Portability:** Request the transfer of your personal information to you or to a third party.

8.2 Request Process and Timeframes

To exercise the rights described above, please submit a verifiable request to us by:

- Emailing us at support@lobbyIQ.com; or
- Sending a letter to our mailing address provided in the Contact Information section.

Your request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We will respond to verifiable consumer requests within 30 days of receipt. If we require more time, we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option.

8.3 Contact Information for Requests

For any questions or concerns about this Privacy Policy, your personal information, our use of your information, or your privacy rights, please contact us at:

Email: support@lobbyIQ.com

Mail: 802 W Bannock St, Ste 406A, Boise, ID 83702

9. DATA RETENTION

9.1 Retention Periods and Criteria

We will retain your personal information only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your information to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our policies.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you;
- Whether there is a legal obligation to which we are subject;
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation, or regulatory investigations).

9.2 Deletion Procedures

When we no longer need to process your personal information for the purposes set out in this Privacy Policy, or you request deletion of your information, we will securely delete or anonymize your information. If complete deletion is not possible (for example, because your

personal information has been stored in backup archives), we will securely store your personal information and isolate it from any further processing until deletion is possible.

9.3 Business Purpose Requirements

We may retain certain information for legitimate business purposes, such as:

- Business records for financial reporting and compliance obligations;
- Information relevant to potential disputes or litigation;
- Information necessary to prevent fraud and abuse;
- Information that may be relevant to future customer service inquiries.

10. CHILDREN'S PRIVACY

10.1 Age Restrictions and COPPA Compliance

Our Services are not intended for children under 13 years of age. No one under age 13 may provide any information to or on the Services. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on our Services or through any of their features, register on the Services, make any purchases through the Services, use any of the interactive or public comment features of our Services, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use.

Our Services are designed for individuals who are at least 13 years of age. By using our Services, you represent that you are at least 13 years old.

10.2 No Knowing Collection from Children Under 13

We do not knowingly collect personal information from children under 13. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at support@lobbyIQ.com.

10.3 Parental Notification Procedures

If we learn that we have inadvertently collected personal information from a child under the age of 13, we will:

- Immediately cease processing such information;
- Promptly delete the information from our records;
- Notify parents of the information we have collected, how it was used, and our deletion procedures.

11. INTERNATIONAL DATA TRANSFERS

11.1 Domestic Processing Confirmation

All personal information we collect is processed and stored in the United States. We do not transfer your personal information outside of the United States.

11.2 US Jurisdiction Statement

By using our Services, you acknowledge and agree that your information will be processed in the United States, where privacy laws may be different from those in your country of residence. By providing your personal information to us, you consent to the transfer of your personal information to the United States and the processing of your personal information in the United States in accordance with this Privacy Policy.

12. CHANGES TO THIS PRIVACY POLICY

12.1 Update Procedures and Notification

We may update this Privacy Policy from time to time. If we make material changes to how we treat our users' personal information, we will notify you by email to the email address specified in your account and/or through a notice on the Services home page.

The date the Privacy Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Services and this Privacy Policy to check for any changes.

12.2 Continued Use Constitutes Acceptance

Your continued use of our Services after we make changes is deemed to be acceptance of those changes. If you do not agree to the changes, you must stop using our Services.

12.3 Effective Date of Changes

Any changes to this Privacy Policy will become effective 30 days after they are posted, unless otherwise specified. During this 30-day period, you may contact us with any questions or concerns about the changes.

13. CONTACT INFORMATION

13.1 Business Contact Details

Willard AI LLC

802 W Bannock St, Ste 406A

Boise, ID 83702

13.2 Privacy-Specific Contact Email

For privacy-specific concerns, please contact:

Email: support@lobbyIQ.com

13.3 Mailing Address

For written communications, please use:

Willard AI LLC

Attn: Privacy Officer

802 W Bannock St, Ste 406A

Boise, ID 83702