

VERVE GROUP INC. PRIVACY POLICY

Effective date: 28th March, 2025

1. Introduction and Scope

This Privacy Policy ("Policy") is established by Verve Group Inc. ("Company," "we," "us," or "our"), a corporation incorporated under the laws of **Ontario, Canada**, with its principal place of business in **Ontario, Canada**. This Policy governs the collection, use, processing, storage, disclosure, and protection of information, including personal information, obtained from users ("you" or "your") of our website (www.aisalespro.io), AI phone receptionist services, and any other services we provide (collectively, the "Services").

By accessing or using our Services, you expressly consent to the practices described in this Policy. This Policy is incorporated into and subject to our Terms of Service.

2. Information Collection and Categories

2.1 Personal Information We collect various categories of personal information, including but not limited to: a) Identifiers such as real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers. b) Commercial information, including records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. c) Audio, electronic, visual, or similar information, including call recordings and transcripts. d) Professional or employment-related information.

2.2 Usage Data We automatically collect certain information about your equipment, browsing actions, and patterns when you interact with our Services. This may include: a) Details of your visits to our website, including traffic data, location data, logs, and other communication data. b) Information about your computer and internet connection, including your IP address, operating system, and browser type. c) Call logs, text logs, and associated metadata.

2.3 Cookies and Tracking Technologies We deploy cookies, web beacons, and other tracking technologies to collect and store information about your interactions with our Services. These technologies may be used to analyze trends, administer the website, track users' movements around the website, and gather demographic information about our user base as a whole.

Examples of Cookies we use:

- Session Cookies: We use Session Cookies to operate our Service.
- Preference Cookies: We use Preference Cookies to remember your preferences and various settings.

- Security Cookies: We use Security Cookies for security purposes.
- Advertising Cookies: Advertising Cookies are used to serve you with advertisements that may be relevant to you and your interests.

2.4 Location Data If you grant us permission, we may use and track your location data. We utilize this information to offer features, enhance, and personalize our service. You have the option to enable or disable location services using your device's settings whenever you use our Service.

3. Use of Information

3.1 Primary Purposes We may use the information we collect for various purposes, including but not limited to: a) Provision and maintenance of our Services. b) Personalization and enhancement of user experience. c) Processing of transactions and management of user accounts. d) Communication regarding our Services, including updates, security alerts, and support messages. e) Analysis of usage patterns and trends to improve our Services. f) Detection, prevention, and addressing of technical issues, fraud, or other illegal activities.

3.2 Secondary Purposes In addition to the primary purposes, we reserve the right to use the collected information for any lawful purpose, including but not limited to: a) Development and training of artificial intelligence and machine learning models. b) Aggregation and anonymization of data for business intelligence and market research. c) Creation of derivative works and products based on collected data and insights.

4. Data Sharing and Disclosure

4.1 No Sale of Personal Information Verve Group Inc. does not sell, rent, or lease your personal information to third parties for monetary or other valuable consideration.

4.2 Data Access and Usage Verve Group Inc. maintains full access to all data collected through our Services. We reserve the right to use this data internally for any lawful purpose, including but not limited to: a) Improving and optimizing our Services b) Developing new products and features c) Training and enhancing our artificial intelligence and machine learning models d) Conducting research and analysis e) Creating aggregated or anonymized datasets

4.3 Data Sharing While we do not sell your data, we may share your information in the following circumstances:

a) Service Providers: We may engage third-party companies and individuals to facilitate our Services ("Service Providers"), provide Services on our behalf, perform Service-related services, or assist us in analyzing how our Services are used. These third parties have access to your

information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

b) Business Transfers: In the event of a merger, acquisition, or sale of all or a portion of our assets, your information may be transferred as part of that transaction. We will notify you via email and/or a prominent notice on our website of any change in ownership or uses of your information.

c) Legal Requirements: We may disclose your information if required to do so by law or in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of Verve Group Inc.
- Prevent or investigate possible wrongdoing in connection with the Services
- Protect the personal safety of users of the Services or the public
- Protect against legal liability

d) Strategic Partnerships: We may share non-personal, aggregated, or anonymized data with strategic partners for business purposes, provided that such sharing does not involve the sale of personal information for profit.

4.4 Consent for Data Sharing By using our Services, you expressly consent to the data sharing practices outlined in this Privacy Policy. You acknowledge that Verve Group Inc. has full access to all data collected through the Services and may use this data as described herein.

5. Data Retention and Security

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

5.2 Security Measures We implement a variety of security measures to maintain the safety of your personal information when you enter, submit, or access your personal information. However, no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

6. Your Rights and Choices

6.1 Access and Control You may have certain rights regarding your personal information, which may include the right to: a) Access the personal information we hold about you. b) Rectify any inaccurate or incomplete personal information. c) Request deletion of your personal information, subject to certain exceptions. d) Object to or restrict the processing of your personal information.

To exercise these rights, please contact us using the information provided in Section 13.

6.2 Opt-Out You may opt-out of receiving marketing communications from us by following the unsubscribe instructions provided in any such communication or by contacting us directly.

7. International Data Transfers

Your information, including Personal Data, may be transferred to and processed in countries other than the one in which you reside. These countries may have data protection laws that are different from those of your jurisdiction. By using our Services, you consent to the transfer of information to countries outside your country of residence, including the United States, where we have facilities or engage Service Providers.

8. Children's Privacy

Our Services are not intended for use by children under the age of thirteen. We do not knowingly collect personally identifiable information from children under 13. If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

9. Changes to This Privacy Policy

We reserve the right to update or change our Privacy Policy at any time. If we make a significant change to this Privacy Policy, we will post a notice on our website or send you an email notification. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

10. Your Data Protection Rights Under Specific Laws

10.1 General Data Protection Regulation (GDPR) If you are a resident of the European Union (EU) and European Economic Area (EEA), you have certain data protection rights covered by GDPR. We aim to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

- The right to access, update or to delete your data from our records
- The right to have your information rectified if that information is inaccurate or incomplete
- The right to object to our processing of your Personal Data
- The right to request restriction of processing of your personal information
- The right to data portability
- The right to withdraw consent

10.2 California Privacy Protection Act (CalOPPA) According to CalOPPA, we agree to the following:

- Users can visit our site anonymously
- Our Privacy Policy link includes the word "Privacy" and can easily be found on our website
- Users will be notified of any Privacy Policy changes on our Privacy Policy Page
- Users can change their personal information by emailing us

10.3 California Consumer Privacy Act (CCPA) If you are a California resident, you are entitled to learn what data we collect about you, ask to delete your data and not to sell (share) it. To exercise your data protection rights, you can make certain requests and ask us about your personal information.

In response to a verified request, we will disclose:

- The categories of personal information we've collected about you
- The categories of sources from which we collect your personal information
- The business or commercial purposes for collecting your personal information
- The categories of third parties with whom we share personal information
- The specific pieces of personal information we've collected about you

You also have the right to request deletion of your personal information (subject to certain exceptions) and to opt-out of the sale of your personal information. Please note that Verve Group Inc. does not sell personal information for monetary consideration. However, under CCPA's broad definition of "sale," some data sharing could potentially be considered a "sale."

11. Service Providers

We may employ third-party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used. These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

11.1 Analytics We may use third-party Service Providers to monitor and analyze the use of our Service, including but not limited to:

- Google Analytics
- Cloudflare Analytics
- Segment.io
- Mixpanel
- PostHog

11.2 CI/CD Tools We may use third-party Service Providers to automate the development process of our Service, such as:

- GitHub

12. Payments

If we provide paid products and/or services within the Service, we use third-party services for payment processing (e.g. payment processors). We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy.

13. Contact Information

If you have any questions about this Privacy Policy, please contact us at:

Verve Group Inc. Email: eva.ai@vervegroup.ca

14. Governing Law and Jurisdiction

This Privacy Policy shall be governed by and construed in accordance with the laws of the **Province of Ontario and the federal laws of Canada applicable therein**, without regard to its conflict of law provisions. You agree to submit to the **exclusive jurisdiction of the courts located in Mississauga, Ontario, Canada**, for the resolution of any disputes arising out of or relating to this Privacy Policy or our Services.

By using our Services, you acknowledge that you have read and understood this Privacy Policy and agree to be bound by its terms and conditions.