

Privacy Policy

Effective September 15, 2025

I. Introduction and Commitment to Privacy

A Hat Rack Inc. is committed to respecting and protecting your privacy, particularly with regard to sensitive information. We believe that privacy is a fundamental aspect of our mission and values, and we aim to provide a secure and private experience for all users. Transparency in our data practices is a key principle, empowering you to make informed decisions about your data. We believe in the freedom and privacy of thought, and A Hat Rack Inc. does not sell user data.

II. Scope of the Privacy Policy

This Privacy Policy describes A Hat Rack Inc.'s practices for collecting, using, maintaining, protecting, and disclosing personal data when you interact with our websites, applications, products, and services (collectively referred to as "Services"). This policy does not apply to content processed on behalf of business customers (e.g., via APIs), where separate customer agreements govern data use.

III. Categories of Personal Data Collected and Their Sources

A Hat Rack, Inc. collects different types of personal data as defined under California privacy laws. These categories, along with their sources, are outlined below:

1. Personal Data You Provide Directly

- **Account Information:** Includes your name, email address, password, phone number, billing/shipping address, payment details, and transaction history. Collected when you create an account, subscribe, or make purchases.
- **User Content:** Any personal data you input into the Services, such as prompts, journal entries, messages, uploaded files, images, video, or audio recordings.
- **Communication Information:** Data you provide when contacting A Hat Rack, Inc. (e.g., via email, chat, or social media), including your name, contact details, and message content.
- **Identity/Verification Data:** Information provided for surveys, contests, promotions, events, or to verify your identity, age, or eligibility.

- **Preferences and Feedback:** Information you provide about your interests, settings, or responses to surveys and feedback forms.

2. Personal Data Collected Automatically from Your Use of the Services

- **Technical Information:** Internet Protocol (IP) address, browser type and settings, device identifiers, operating system, device name, language settings, and date/time of requests.
- **Usage Data:** Information about your interactions with the Services, including features used, content viewed, actions taken, frequency and duration of use, time zone, and connection type.
- **Location Information:** General location derived from your IP address for security and personalization. Precise geolocation (e.g., GPS) is only collected with your explicit consent.
- **Cookies and Tracking Technologies:** Data collected through cookies, pixels, and similar tools to operate the Services, remember preferences, improve user experience, and support analytics, advertising, and security.
- **Biometric Data:** If you enable biometric authentication (e.g., Touch ID, Face ID), only success/failure confirmations are received. Actual biometric identifiers remain on your device and are never transmitted to A Hat Rack, Inc.
- **Device and Network Data:** Information about your mobile carrier, internet service provider, and device performance metrics.

3. Personal Data Received from Other Sources (Third Parties)

- **Trusted Partners:** Data from security partners (for fraud prevention, abuse detection) and marketing vendors (for campaign effectiveness).
- **Publicly Available Information:** Information collected from public sources, such as websites or social media, to improve Services and train models.
- **Third-Party Integrations:** Data from services you connect with (e.g., Google Health Connect, Apple HealthKit), collected only with your permission.
- **Social Media Platforms:** Information you post on A Hat Rack, Inc.'s official social media accounts or that you make publicly available.
- **Service Providers:** Information from payment processors, analytics providers, or cloud hosting services that support our operations.

IV. How Personal Data is Used (Processing Purposes)

A Hat Rack, Inc. uses personal data for the following purposes, consistent with privacy laws and other applicable regulations:

1. To Provide and Maintain Services

- Delivering core functionality, managing accounts, and ensuring compatibility.
- Providing customer support and responding to inquiries.

2. To Improve and Develop Services and Conduct Research

- Analyzing usage patterns, troubleshooting errors, and testing new features.
- Conducting research using aggregated or de-identified data.
- Using User Content to train or improve AI models, with opt-out options available.

3. To Communicate with You

- Sending service notifications, updates, and responding to questions.
- Promoting new features, products, or events (with opt-out options for marketing).

4. To Promote Safety and Security

- Authenticating users and securing accounts.
- Detecting and preventing fraud, abuse, and security threats.
- Enforcing terms, investigating violations, and conducting audits.

5. To Comply with Legal Obligations

- Meeting accounting, tax, and regulatory requirements.
- Responding to lawful requests or legal claims, while opposing overbroad surveillance requests and notifying users when legally permitted.

6. To Personalize Your Experience

- Tailoring content, remembering preferences, and suggesting relevant features.

7. To Enable Third-Party Integrations

- Facilitating connections with external services (e.g., health platforms) when explicitly authorized by you.

V. How Personal Data is Shared or Disclosed

- **No Sale of Personal Data:** A Hat Rack Inc. explicitly states that we do not sell or rent personal information.
- **Vendors and Service Providers:**
 - Personal data is disclosed to third-party vendors and service providers who perform functions on behalf of A Hat Rack Inc., such as hosting, cloud services, customer support, payment processing, email communication, analytics, content delivery, and safety monitoring.
 - These parties are typically instructed to access, process, or store personal data only in the course of performing their duties to A Hat Rack Inc. and are required to protect data to similar standards.
 - For sensitive data (e.g., journal entries, AI processing), A Hat Rack Inc. may use providers with Business Associate Agreements (BAAs) and/or Zero Data Retention (ZDR) agreements to ensure data protection and immediate discard after processing.
- **Legal Compliance and Protection:**
 - Data Minimization and Purpose Limitation (California Residents): In compliance with the California Consumer Privacy Act (CCPA) and the California Privacy Rights Act (CPRA), A Hat Rack, Inc. collects, uses, and retains only the minimum personal information reasonably necessary to provide and improve our Services. We do not routinely monitor, read, or review every journal entry, prompt, message, or other user-generated content. Access to such content occurs only in limited circumstances—for example, when required by law, to investigate suspected abuse or security issues, or when you explicitly request support. We do not use your personal content for unrelated purposes, and we retain it only for as long as is reasonably necessary to fulfill the purposes disclosed in this Privacy Policy.
 - Information may be shared with government authorities, industry peers, or other third parties to comply with legal obligations, legal processes (e.g., subpoenas), protect A Hat Rack Inc.'s rights or property, detect fraud or illegal activity, and ensure the safety, security, and integrity of products, employees, and the public.
 - A Hat Rack Inc. has a policy to notify users of legal requests for their data unless legally prohibited from doing so.
- **Business Transfers:** Personal data may be disclosed and transferred to a successor or affiliate as part of strategic transactions, reorganizations, mergers, acquisitions, sales of assets, or bankruptcy proceedings. Assurances are

typically sought from the acquiring entity that personal data will be handled consistent with this Privacy Policy.

- **Affiliates:** Data may be disclosed to entities that control, are controlled by, or are under common control with A Hat Rack Inc.
- **User-Directed Sharing:** Features within the Services may allow users to interact or share information with other users or third parties (e.g., via shared links, community forums, or third-party integrations). When users share data this way, its use is then governed by the privacy policies and terms of those other users or third parties.
- **Aggregated or De-identified Information:** Non-personal data that no longer identifies an individual may be used for analysis, research, and product improvement, and may be disclosed publicly or to third parties.

VI. Data Retention

Personal data is retained only for as long as necessary to provide the Services, fulfill legitimate business purposes (e.g., resolving disputes, safety, security, analytics), or comply with legal obligations (e.g., tax, legal claims). The length of retention depends on factors such as the purpose for processing, the amount, nature, and sensitivity of the information, the potential risk of harm, and any legal requirements. Some data, like temporary chats or deleted account data, may be kept for a short period (e.g., 30 days) for safety or disaster recovery purposes before permanent deletion.

VII. User Rights (Data Subject Rights)

Depending on your location (e.g., European Economic Area, UK, Switzerland, or specific U.S. states), you may have various statutory rights regarding your personal data:

- **Right to Access:** To know what personal data is processed about you and to obtain a copy of that data.
- **Right to Deletion/Erasure:** To request the deletion of your personal data from records, subject to certain exceptions (e.g., legal obligations to retain data).
- **Right to Rectification/Correction/Update:** To update or correct inaccurate or incomplete personal data.
- **Right to Data Portability:** To receive personal data provided by you in a structured, commonly used, and machine-readable format to transfer to another service.

- **Right to Object to Processing:** To object to certain types of processing of your personal data, particularly for direct marketing purposes or when processing is based on legitimate interests.
- **Right to Restrict Processing:** To request the limitation of how personal data is processed under specific
- **Right to Withdraw Consent:** To withdraw consent where it served as the legal basis for processing, at any time.
- **Right to Lodge a Complaint:** To file a complaint with a local data protection authority.

A Hat Rack Inc. provides specific mechanisms (e.g., account settings, dedicated privacy portals, email addresses) for users to exercise these rights. Identity verification may be required for security purposes before fulfilling requests. A Hat Rack Inc. is committed to non-discrimination for exercising privacy rights.

VIII. Security Measures

A Hat Rack Inc. implements technical, administrative, and organizational measures designed to protect personal data from loss, misuse, and unauthorized access, disclosure, alteration, or destruction.

- **Data Encryption:** All data transmitted between users and services is secured using strong encryption protocols (e.g., SSL/TLS), and data is often encrypted at rest as well (e.g., AES-256).
- **Access Control:** Robust measures are in place to limit access to sensitive user data to authorized personnel, often requiring multi-factor authentication and maintaining audit logs. Employees do not have direct access to production data.
- **Personnel Training:** Teams are trained on the latest security practices and data protection measures.
- **Regular Assessments:** A Hat Rack Inc. conducts internal reviews and may engage in third-party audits or regular testing of systems for security vulnerabilities.

While A Hat Rack Inc. strives for robust security, we acknowledge that no internet or email transmission is ever fully secure or error-free.

IX. Changes to the Privacy Policy

A Hat Rack Inc.'s Privacy Policy is subject to periodic updates to reflect changes in practices, applicable laws, or service offerings. We will notify users of material changes

by publishing an updated version on our website, or through email or in-app notifications. Continued use of the Services after a revised policy is published constitutes acceptance of the amended terms.

X. Contact Information

For any questions, privacy concerns, or to exercise your data rights, please contact A Hat Rack Inc. at:

- **Email:** info@ahatrack.com

XI. Specific U.S. State Disclosures

If you are a California resident, you have specific rights under the California Consumer Privacy Act (CCPA) and the California Privacy Rights Act (CPRA). These rights include:

- **Right to Know:** You may request that A Hat Rack, Inc. disclose the categories and specific pieces of personal information we have collected about you, the sources of that information, the purposes for which it is used, and the categories of third parties with whom it is shared.
- **Right to Delete:** You may request that we delete personal information we have collected from you, subject to certain exceptions (such as when the information is needed to provide Services, comply with legal obligations, or detect security incidents).
- **Right to Correct:** You may request that we correct inaccurate personal information we maintain about you.
- **Right to Opt Out of Sale or Sharing:** You may direct us not to sell or share your personal information with third parties for cross-context behavioral advertising. A Hat Rack, Inc. does not sell personal information in the traditional sense, but we may share limited data with service providers or partners to operate and improve our Services.
- **Right to Limit Use of Sensitive Personal Information:** You may request that we limit the use and disclosure of sensitive personal information (such as precise geolocation, biometric identifiers, or financial account details) to only what is necessary to provide the Services.
- **Right to Non-Discrimination:** You have the right not to be discriminated against for exercising any of your privacy rights. We will not deny you Services, charge you different prices, or provide a different level of quality because you exercised your rights.

How to Exercise Your Rights

To exercise these rights, please contact us at info@ahatrack.com. We may require identity verification before fulfilling your request. You also have the right to appeal any decision we make regarding your privacy rights. A Hat Rack Inc. does not sell or share personal data for targeted advertising as defined by state laws.