## **Privacy Policy**

Last Updated: [date], 2025

**Poplin Technologies, Inc.** and its subsidiaries and affiliated companies (collectively, "Poplin", the "Company", "we", "us") take your privacy seriously. This Privacy Policy explains how we collect, use, disclose, and otherwise handle (collectively, "process") your personal information. This Policy also describes your choices regarding how we handle your personal information and how to make those choices, how we safeguard your personal information, and how you may contact us regarding our privacy practices.

As used in this Privacy Policy, the term "personal information" means any information related to or about an identified or identifiable natural person.

#### **Assistance For The Disabled**

This 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. Alternative formats of this Policy are available to individuals with a disability. Please contact tech@poplin.co for assistance.

### **This Privacy Policy Explains:**

- 1. Scope of This Policy
- 2. Personal Information We Collect
- 3. Sources of Personal Information
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## 1. Scope of This Policy

You may interact with Poplin online and offline for a variety of reasons. This Policy applies to the personal information we collect or process:

- When you visit our website <a href="https://poplin.co/">https://poplin.co/</a> as it may be modified, relocated, or redirected from time to time (the "Website").
- Through our apps, including our web application (<a href="https://app.poplin.co/">https://app.poplin.co/</a>), the Poplin mobile application, and the Poplin for Laundry Pros application as they may be modified from time to time (the "App" or together the "Apps"). Together, the Website and the Apps are the "Poplin Platform".
- When you interact with us in other ways, such as when communicate with us, or attend an event that we host.

Poplin may collect and process your personal information in different ways, depending on your relationship with us. For example, this Policy applies to our individual customers seeking laundry services through the Poplin Platform ("Customers"), individuals that provide laundry services to Customers through the Poplin Platform ("Laundry Pros"), and applicants to become a Laundry Pro. This Policy also applies to personal information Poplin may collect from or about the corporate representatives of our customers, vendors, suppliers, and others for the purposes of conducting our own business, such as contracting and invoicing ("Business Contacts").

Except where the policy refers to one or more categories of individual in particular, this Policy applies to all categories of individual listed above collectively.

This Policy does not apply with respect to the personal information processed by Poplin in our capacity as an employer, including the personal information of job applicants or the Company's current or former employees. Poplin maintains separate policies, if and to the extent required by law, with respect to the Company's processing of personal information in its capacity as employer.

### **Third-Party Sites**

The Poplin Platform may include links to, and plug-ins from, sites or applications operated by third parties ("Third-Party Sites"). Poplin does not control any Third-Party Sites and is not responsible for any personal information they may collect. The data collection practices of Third-Party Sites are governed by their privacy policies. If you choose to enter any Third-Party Site from the Poplin Platform, please refer to that site's privacy policy to learn more about that site's processing of your personal information.

### **Children's Online Privacy Protection Act Compliance**

We do not collect information from anyone under 16 years of age. The services we provide, together with the Poplin Platform, are all directed to individuals who are at least 16 years old. If you are under the age of 16, you are not authorized to use the Poplin Platform.

### 2. Personal Information We Collect

- Identifiers: such as your name, email address, mailing address, phone number, online account identifier (username) and social media handle. For Laundry Pros, this also includes your driver's license number, Social Security number, data of birth for identification, photograph, and contact information for your emergency contact(s).
- Professional Information:
  - (For Laundry Pros) Payment information you provide us, including your bank number, routing information, and tax information, and business license or permit information where necessary for your location.
  - o (For Business Contacts) Your job title and business contact information (business email address, mailing address, and phone number), and other information necessary to manage the relationship between Poplin and your employer.
- Commercial Information and Activity on the Poplin Platform: such as order history, status of current orders, and information about your use of the Poplin Platform, including:
  - o **(For Customers)** The date, time, and delivery information for your order, preferences or instructions for an order or within your account (e.g., detergent type, preferred Laundry Pro, and folding preferences), gift cards ordered or redeemed, promotional codes and

discounts used and received, and participation in our referral program or other special programs.

o (For Laundry Pros) Order information (e.g., orders accepted or declined, time to complete orders, and number of orders completed), compliments, complaints, or other ratings or feedback received from Customers, and earnings history and tip amounts for orders.

### • Other Personal Information:

**(For Customers) Payment Information**, such as payment card information or other payment details for orders you place. Payment information is stored and processed by our third-party payment processors; Poplin receives and processes only limited details about the payment method and amounts.

**Content you share**, such as reviews, ratings, or other feedback about orders, Laundry Pros, or the Poplin Platform. For Laundry Pros this also includes information you wish to provide as part of your Laundry Pro Profile shown to Customers, such as photographs, videos, or hobbies and interests.

**Communications Information**: including the content of in-App messages between Customers and Laundry Pros, and the content of customer support or other communications with us, such as SMS/text messages, chats, phone calls, or emails relating to the Poplin Platform or our services. We also collect certain metadata about those communications, *i.e.*, date, time, and method(s) of communication used.

**Characteristics of Protected Classifications**: For Laundry Pros this may include your age or gender as reflected on your driver's license for Laundry Pros. For Customers, this may include your age (if applicable) to determine your eligibility for senior discounts.

Internet or Other Electronic Network Activity Information: information about your usage of the Poplin Platform on the computers, phones, or other devices you may use to interact with Poplin. This can include the pages you viewed, the services and features you used or interacted with; your browser type and details about any links or communications with which you interacted; internet protocol (IP) address or device-based identifiers; browser or App information including version, type, and settings; and operating systems and version.

**Geolocation data**: If you have explicitly granted access through your device settings, certain features in the Poplin Platform may collect your precise location information. You can adjust the level of access (for example, only when you open and use the Apps) or disable location services at any time through your device settings and permissions.

**Inferences**: for example, we might infer that you would be interested in other services, or preferences about our services, based on your order history and usage of the Poplin Platform.

#### **Information We Collect Automatically**

When you browse our Website, we may collect information automatically through cookies and other technologies (web beacons, pixel tags) to help enhance our ability to serve you. For example, we use these technologies to help us to better understand user behavior including for security and fraud prevention purposes, tell us which parts of our Website people have visited, and to personalize your experience on the Website. For more information about cookies, or how to manage or delete cookies, please see our Cookies Policy available here.

#### Do Not Track Setting

Our Website does not track your online activities over time and across websites or online services on an individually identifiable basis, and we do not allow third parties to use our website to track your activities over time or across other websites. Like many websites, the Website is not designed to respond to "Do Not

Track" signals received from browsers. To learn more about "Do Not Track" signals, go to: https://allaboutdnt.com/.

### 3. Sources of Personal Information

- You, for example, when you use the Website, create an account, use the Poplin Platform, or when you otherwise provide information directly to us.
- **(For Laundry Pros) Customers**, for example, when we receive ratings, reviews, or other feedback about their order and their experience with you as a Laundry Pro.
- **Service providers**, for example, payment processors, analytics providers, IT, and system administration services.
- **Automated technologies**, for example, browsing activity collected by automated technologies on the Website.
- Third parties, for example, lawyers, bankers, auditors, and insurers who provide consultancy, banking, legal, insurance, and accounting services.
- Public sources, for example, public databases or social media.
- Surveillance/recording technologies, for example, with voicemail or through and audio recording technologies with consent to the extent required by law.
- **Government or administrative agencies**, for example, law enforcement, public health officials, and other government authorities.

### 4. How We Use Personal Information

Depending on how you use the Poplin Platform and your interactions with us, we use the categories of personal information we collect for one or more of the purposes below:

### Providing Our Services and the Poplin Platform, including:

- To connect Customers with Laundry Pros and manage placing and completion of orders.
- To communicate with you.
- To facilitate communication between Customers and Laundry Pros.
- To calculate and process payments.
- To improve the Poplin Platform and our services, develop new products and services, and conduct research on further improvements.
- To enhance your experience using the Poplin Platform and our services, and to personalize your experience.

## Support and Marketing, including:

- For customer support.
- To respond to any requests, queries, suggestions, feedback, or comments you may have.
- To send you marketing information about our products and services, including notifying you of events, membership and rewards programs, promotions, and sweepstakes, with your consent in accordance with applicable law.
- To inform you of any changes to the services, your account (if applicable), this Privacy Policy, or any other policies or terms in relation thereto.
- To prevent, locate, and fix any software issues or bugs.
- To perform operations to maintain the services, including to conduct data analysis, testing, and research; and to monitor and analyze usage and activity trends.

### Monitoring and Security, including:

- To authenticate and verify users, including to ensure that Laundry Pros meet certain standards.
- To administer and protect our business and the Poplin Platform (including troubleshooting, analysis, testing, system maintenance, support, reporting and hosting of data, and preventing fraud and abuse).
- To store, host, or backup (whether for disaster recovery or otherwise) our services or any data contained therein.
- To prevent, investigate, and resolve incident, theft, fraud, or other misuse of the Poplin Platform or our services.
- To protect the rights, property, or safety of the Company, you, or others.

## **Compliance and Meeting Legal Requirements, including:**

- To report suspected criminal conduct to law enforcement and cooperate in investigations.
- To exercise the Company's rights under applicable law and to support any claim, defense, or declaration in a case or before a jurisdictional and/or administrative authority, arbitration, or mediation panel.
- In connection with a corporate transaction, sale, or assignment of assets, merger, divestiture, or other changes of control or financial status of the Company or any of its subsidiaries or affiliates.
- To ensure compliance with applicable laws and regulatory obligations.

**Incidental Purposes:** We may also use your personal information for incidental purposes related to or in connection with the above, or for any other purpose disclosed to you at the point of collection or for which you provide your prior consent.

## 5. How We May Disclose Personal Information

The Company discloses personal information as necessary for the purposes described in Section 3 above to the following categories of external recipients:

- **Between Laundry Pros and Customers**: The Company shares certain personal information between Customers and the Laundry Pros that complete their orders, as part of our providing services through the Poplin Platform. For example:
  - For Laundry Pros, we may disclose your name, profile photo, and limited information included in your account profile to Customers, so that Customers may identify you, communicate with you, and provide reviews, ratings, and other feedback.
  - o For Customers, we may disclose your name, pick-up and delivery location, and order information (*e.g.*, instructions and preferences) to Laundry Pros, so that Laundry Pros can communicate with you, and complete your order.
- Service providers and contractors: The Company discloses your personal information to service
  providers and contractors for the purposes above to assist us in meeting our business needs and
  contractual and legal obligations.
- **Third parties**: For example, we might disclose personal information to lawyers to assist us with legal compliance or to business partners to assist us in providing services to you.
- **Government or administrative agencies**: For example, the Company may report unlawful activity to law enforcement.
- **Public**: The Company may disclose personal information to the public as part of a press release, for example, to announce the winner of a sweepstakes if required by state law.

- Required Disclosures: We may be required to disclose personal information in a court proceeding, in response to a court order, subpoena, civil discovery request, other legal process, or as otherwise required by law.
- Legal Compliance and Protections: We may disclose personal information when we believe
  disclosure is necessary to comply with the law or to protect the rights, property, or safety of the
  Company, our users, or others.

#### 6. How We Secure Personal Information

The security and confidentiality of your personal information is important to us. We have technical, administrative, and physical security measures in place to protect your personal information from unauthorized access or disclosure and improper use.

For example, we use Transport Security Layer (TSL) encryption to protect the data collection forms on our Site. In addition, we restrict access to your personal information. Only employees who need the personal information to perform a specific job (for example, a customer service representative) are granted access to personal information. Employees with access to personal information are kept up-to-date on our security and privacy practices.

It is important for you to protect against unauthorized access to your password and to your computer. Be sure to close your browser after you have completed your visit to our Website or Apps.

Please note that despite our reasonable efforts, no security measure is ever perfect or impenetrable, so we cannot guarantee the security of your personal information.

## 7. How Long We Retain Personal Information

We retain your personal information for the duration of our relationship with you as a Customer, Laundry Pro, or Business Contact, as applicable. We also retain your personal information for as long as necessary for the purposes described in Section 4, above. We will retain personal information longer as necessary to comply with legal, administrative, or procedural requirements, for example, a litigation hold.

## 8. Additional Information For California Residents

This section applies only to individuals who reside in the state of California ("California residents"), to the extent that our processing of their personal information is subject to the California Consumer Privacy Act, as amended by the California Privacy Rights Act, (the "CCPA").

### a. Notice at Collection for California Residents

The Company collects personal information identified in Section 1, for the purposes identified in Section 3, and retains it for the period described in Section 7, above. We do not sell your personal information or disclose it for cross-context behavioral advertising ("sharing"). We also do not collect or process sensitive personal information for the purpose of inferring characteristics about you.

### b. Information About Disclosures of Personal Information

Disclosures for Business Purposes

The Company has disclosed each of the categories of personal information listed in Section 1, above, for the following "business purposes", as that term is defined under CCPA, in the last 12 months:

- **Between Laundry Pros and Customers**: For the business purpose of processing or fulfilling orders and transactions including the specific purposes described in Section 3, above.
- **Service providers:** For the business purpose of performing services on Company's behalf and, in particular, for the specific purposes described in Section 3, above.
- Auditors, lawyers, consultants, and accountants engaged by Company: For the business purpose of auditing compliance with policies and applicable laws, in addition to performing services on Company's behalf.

#### Sales and Sharing

We do not sell or "share" (disclose for cross-context behavioral advertising) your personal information. In addition, we have no actual knowledge that we sell or share the personal information of individuals of any age including children under 16.

#### Aggregated and Deidentified Information

At times, the Company converts California residents' personal information into deidentified information using reasonable measures to ensure that the deidentified information cannot be associated with the individual ("Deidentified Information"). We maintain Deidentified Information in a deidentified form and do not attempt to reidentify it, except that we may attempt to reidentify the information solely for the purpose of determining whether the deidentification processes ensure that the information cannot be associated with the individual.

### c. Your California Privacy Rights

Subject to applicable law, California residents have the following rights:

- Right to Know: You have the right to submit a verifiable request for specific pieces of your personal information and for information about the Company's collection, use, and disclosure of your personal information. Please note that the CCPA's right to obtain "specific pieces" does not grant a right to the whole of any document that contains personal information, but only to discrete items of personal information. Moreover, California residents generally just have a right to know categories, for example, categories of third parties to which personal information is disclosed, but not the individual third parties.
- **Right to Delete**: You have the right to submit a verifiable request for the deletion of personal information that you have provided to the Company.
- Right to Correct: You have the right to submit a verifiable request for the correction of inaccurate
  personal information maintained by the Company, taking into account the nature of the personal
  information and the purposes of processing the personal information.

**Note on Sensitive Personal Information:** We do not infer characteristics from sensitive personal information. The Company only uses sensitive personal information as necessary to perform the services or provide the goods the average person would reasonably expect when requesting those goods or services, to ensure security and integrity, short term transient use, to maintain the quality of our products and services, or for other purposes permitted by the CCPA and its regulations without the right to opt out.

### d. How to Exercise Your Rights

Company will respond to requests to know, delete, and correct in accordance with applicable law if it can verify the identity of the individual submitting the request. You can exercise these rights in the following ways:

- Call us at 833-783-7427
- Email us at tech@poplin.co

### e. How We Will Verify Your Request

If you submit a request through an adequately secure password-protected account that you created before the date of your request, we will use the authentication mechanisms in the account to verify your identity. Otherwise, we match personal information that you provide us against personal information we maintain in our files. The more risk entailed by the request (*e.g.*, a request for specific pieces of personal information), the more items of personal information we may request to verify your identity. If we cannot verify your identity to a sufficient level of certainty to respond securely to your request, we will let you know promptly and explain why we cannot verify your identity.

### f. Authorized Agents

You may designate an authorized agent to exercise your right to know, to correct, or to delete. If an authorized agent submits a request on your behalf, the authorized agent must submit with the request another document signed by you that authorizes the authorized agent to submit the request on your behalf. In addition, we may ask you or your authorized agent to follow the applicable process described above for verifying your identity. You can obtain the "Authorized Agent Designation" form by contacting us using the email address listed above.

In the alternative, you can provide a power of attorney compliant with the California Probate Code.

## g. Non-Discrimination

Poplin will not unlawfully discriminate against you for exercising your privacy rights under the CCPA.

### 9. Changes to This Privacy Policy

If we change this Privacy Policy, we will post those changes on this page and update the Privacy Policy modification date above. If we materially change this Privacy Policy in a way that affects how we use or disclose your personal information, we will provide a prominent notice of such changes and the effective date of the changes before making them.

## 10. Contact Us

- <u>For Customer Support</u>: Support is available through the in-App Help Center, accessibly by opening the App, tap on the menu, and select "Help." If you don't have the App, you can also access your account online at app.poplin.co.
- For questions or concerns about our privacy policies and practices: You can contact us through the in-App Help Center, via phone at 833-783-7427, or via email at <a href="tech@poplin.co">tech@poplin.co</a>.

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