

Privacy Policy

This Privacy Policy applies to use of the Word Exploration Technologies, Inc. d/b/a Word X (“we”, “us” or the “Company”) site and services including, use of any hosted software, widgets, plugins, related services and websites located in the pWin.ai hosted service platform, its subdomains, and all related web-based and mobile applications (collectively, “pWin.ai” or the “Services”). And owned by the Company or its parent company.

1. What information do we collect?

We may collect, store and use the following kinds of information including personal data:

- (a) Information about your (“you”, “your”, or “Users”) visits to and use of this website.
- (b) Information about any transactions carried out between you and us on or in relation to this website, including information relating to any purchases you make of our products or services.
- (c) Information that you provide to us for the purpose of registering with us and/or subscribing to our website services and/or email notifications. This may include information such as an email address, phone number, and password to create an account.
- (d) When Users purchase the Services, our affiliates, consultants, vendors and our third party payment processors may collect and store billing address and credit card information on our behalf, or we may do this ourselves.
- (e) We collect extensive information about the use and access of our Services, which may include administrative and support communications with us and information about the projects, messages, people, features, content, and links you interact with, and what third party applications you use (if any).
- (f) Our servers or partners may automatically log certain information, including your Internet Protocol address, the address of the web page you visited before using the Services, your browser type and settings, the date and time of your use of the Services, information about your browser configuration and plug-ins, language preferences, and cookie data.
- (g) Information that you provide to us when using or interacting with our Services.
- (h) We may also collect store and use non-personal data about your visits to and use of this website.

2. Information about website visits

We may collect information about your computer and your visits to this website. This information may include your IP address, geographical location, browser type, referral source, length of visit and number of page views. We may use this information in the administration of this website, to improve the website’s usability, and for marketing purposes.

We use cookies on this website. A cookie is a text file sent by a web server to a web browser and stored by the browser. The text file is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

We may send a cookie which may be stored by your browser on your computer's hard drive. The information provided by the cookie can be used in the administration of this website, to improve the website's usability, and for marketing purposes. We may also use that information to recognize your computer when you visit our website, and to personalize our website for you. Our advertisers may also send you cookies.

We may use anonymous cookies to record non-personal information such as website activity, date and time of visit, and domain type. We may use this information for retargeting purposes.

Most browsers allow you to refuse to accept cookies. This will, however, have a negative impact on the usability of many websites, including this one.

3. How We Use Your Personal Information

We may access and use your information as reasonably necessary to (a) provide, maintain and improve our Services; (b) to prevent or address service, security, technical issues or at a User's request in connection with customer support matters; (c) as required by law or as permitted by a lawful data request (e.g., subpoena) and (d) as set forth in our agreement with the User or as expressly permitted in writing by the User.

In addition, we may analyze and share with Users and others, derivative insights from the information shared when using the Services, provided that we do not share or disclose (i) any of the underlying personally identifiable information or (ii) any Customer proprietary or confidential information.

In addition to the uses identified elsewhere in this privacy policy, we may use your personal information to:

- (a) Improve your browsing experience by personalizing the website. We carry out research and analyze trends to better understand how users are using the Services and improve them.
- (b) If you contact us with a problem or question, we will use your information to respond.
- (c) Send information (other than marketing communications) to you that we think may be of interest to you by post or by email or similar technology.
- (d) Send to you marketing communications relating to our business or the businesses of carefully selected third parties that we think may be of interest to you by post; or, where you have specifically agreed to this, by email or similar technology.
- (e) Provide other companies with statistical information about our users – but this information will be deidentified and will not be used to identify any individual user.
- (f) We often need to contact you for invoicing, account management and similar reasons. We may send you email and other messages using any number of communication methods that you share with us. We may also contact you to inform you about changes in our Services, our Service offerings, and important Service related notices, such as security and fraud notices. These emails and messages are considered part of the Services and you may not opt-out of them.
- (g) We use account data to administer accounts and keep track of billing and payments.

(h) We may use your information to assist in making the Services secure and to prevent abuse and fraud.

This Privacy Policy is not intended to place any limits on what we do with data that is aggregated and/or de-identified, provided that it (i) is no longer associated with an identifiable user or Customer of the Services, and (ii) does not contain any Customer proprietary or confidential information.

4. How your Personal Information is Shared

In addition to the disclosures reasonably necessary for the purposes identified elsewhere in this privacy policy, we may retain, share and disclose information about you:

(a) With our third-party service providers working on our behalf for the purposes described in this Privacy Policy to help us provide and support our Service or to assist in protecting and securing our systems and services and other business-related functions. This includes: analyzing data, hosting data, engaging technical support for our Services, processing payments, and delivering content and marketing messages.

(b) Sharing personal information of Users, and visitors with third-party advertising networks, exchanges, and social media platforms to serve our advertising on other sites.

(c) With affiliates. We may engage affiliates in our corporate group or other consultants or vendors to process information.

(d) About a user with an entity under which a user account may be held. In a number of circumstances, we may share information with a Company customer about any user using a customer sponsored account.

(e) We may engage with trusted third party companies or individuals, such as third party payment processors, to process information on our behalf. All such third parties are prohibited from using your personal information except to provide these services and they are obligated to maintain the same level of protection of that information as the Company.

(f) During changes to our business structure. If we engage in a merger, acquisition, bankruptcy, dissolution, reorganization, sale of some or all of the Company's assets, financing, acquisition of all or a portion of our business, a similar transaction or proceeding, or steps in contemplation of such activities (e.g. due diligence).

(g) To comply with laws. To comply with legal or regulatory requirements and to respond to lawful requests, court orders and legal process.

(h) To enforce our rights, prevent fraud and for safety. To protect and defend the rights, property, or safety of us or third parties, including enforcing contracts or policies, or in connection with investigating and preventing fraud.

(i) We may disclose or use aggregate or de-identified information for any purpose, provided that it (i) is no longer associated with an identifiable user or Customer of the Services, and (ii) does not contain any Customer proprietary or confidential information.

To the extent we use third-party “sub-processors” in providing our Service, a list of those sub-processors will be made available to authorized representatives of a Customer of the Services that requests the information.

5. Security

We use reasonable administrative, technical, and physical safeguards designed to safeguard the information that we collect and to prevent the loss, misuse or alteration of your personal information. Those safeguards include:

- (i) The pseudonymization and encryption of personal information where we deem appropriate.
- (ii) Taking steps to ensure personal information is backed up and remains available in the event of a security incident.
- (iii) Periodic testing, assessment, and evaluation of the effectiveness of our safeguards.

Of course, data transmission over the Internet is inherently insecure, and we cannot guarantee the security of data sent over the Internet. Please note that no information system can be 100% secure so we cannot guarantee the security of your information.

6. Third Party Software and Services (Links to Other Sites)

Use of pWin.ai may involve third party software and services. 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 website you visit.

We are not responsible for the privacy policies of third-party websites, or the security of your data when you use third party websites.

7. Information about Children

Our Services and websites are not directed at children under 13. If you are aware that children under 13 are providing us with personal information without our consent, please contact us.

8. Data Retention

We retain personal information for the extent we deem necessary to carry out the processing activities described above, including but not limited to compliance with applicable laws, regulations, rules and requests of relevant law enforcement and/or other governmental agencies, and to the extent we reasonably deem necessary to protect our and our partners’ rights, property, or safety, and the rights, property, and safety of our users and other third parties.

9. Information Processing (Your Rights)

Our services are hosted on servers located in the United States, including those supporting our website, customer relationship management (CRM) systems, and our proposal development platform.

Information processed within the pWin.ai application and hosted services platform is maintained within a defined security boundary located in the United States. Access to this environment is restricted to authorized personnel and subject to technical, administrative, and contractual safeguards

designed to protect customer data. The pWin.ai application is designed to align with U.S. government security standards for cloud services, including controls consistent with FedRAMP Moderate baselines.

Information submitted through our public-facing website, CRM systems, or other non-production environments may be accessed and processed by authorized personnel located in the United States and, on a limited basis, in other jurisdictions in connection with sales, support, and operational activities.

We maintain security controls and procedures designed to safeguard all information in accordance with applicable laws and industry practices.

If your use of our website or disclosure of certain information to us would violate any law applicable to you, your right to use the website and/or disclose such information is revoked, as it is wherever use of the website is prohibited by law.

Accessing, Modifying, Rectifying, and Correcting Collected Personal Information

Depending on the laws that apply to you, you may obtain from us certain personal information our records. If you wish to access, review, or make any changes or corrections to personal information you have provided to us through the Services, please contact us at the information provided at the end of this Privacy Policy.

Your California Privacy Rights

California's "Shine the Light" law permits our users who are California residents to request and obtain from us a list of what personal information (if any) we disclosed to third parties for their own direct marketing purposes in the previous calendar year and the names and addresses of those third parties. Requests may be made only once per year per person, must be sent to the email address below, and are free of charge. However, we do not disclose personal information protected under the "Shine the Light" law to third parties for their own direct marketing purposes.

The California Consumer Privacy Act of 2018 ("CCPA") and other state laws enacted from time to time provide residents of those jurisdictions with specific rights regarding their personal information. For individuals whose state of residence does not afford these rights, we may offer them voluntarily and at our discretion, and we reserve the right to limit or revoke any such rights at any time, as may be permitted by applicable laws. This section describes your CCPA rights and explains how to exercise those rights:

- **Right to Know:** You have the right to request what personal information about you we collect, use, disclose, and/or sell, as applicable, over the past 12 months as follows:
 - The categories of personal information we collected about you;
 - The categories of sources from which the personal information is collected;
 - Our business or commercial purpose for collecting or selling that personal information;
 - The categories of third parties with whom we share that personal information;
 - The specific pieces of personal information we collected about you.
- **Right to Delete:** You have the right to request the deletion of your personal information that is collected or maintained by us. If we receive and confirm your verifiable consumer request, we

shall delete (and direct our service providers to delete) your personal information from our records, unless an exception applies or as otherwise required by law.

- Right to Correct: You have the right to correct inaccurate personal information that we have collected and maintain about you.
- Right to Non-Discrimination: You have the right not to receive discriminatory treatment by us for the exercise of the privacy rights described above.
- Right to opt-out of the sale of personal information: You have the right to request to be opted out from the sale of your personal information, if applicable.

Sale of Personal Information

We never monetize your personal information; however, the CCPA has a broad definition of “sale” that includes transactions other than what would be traditionally considered sales. We may “sell” (as defined under the CCPA) the following categories of personal information: Internet, or other electronic network activity information that may be “sold” to third parties who provide cross-platform advertising and related tracking for our Services.

We do not and will not knowingly sell the personal information of minors under the age of 16 without affirmative authorization.

Exercising Your Privacy Rights

To exercise any rights described above under the CCPA or other applicable laws, please submit a verifiable consumer request to us by either:

- Emailing us at the e-mail address below under “Contact Us”
- Sending postal mail us at the postal address below under “Contact Us”

The above rights are subject to our being able to reasonably verify your identity and authority to make these requests. Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer 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.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

The above rights are also subject to various exclusions and exceptions under the law. Under certain circumstances, we may be unable to implement your request, pursuant to applicable law. We will advise you of any reason for denying or restricting a request to the extent permitted by law.

Your Nevada Privacy Rights

Nevada law permits our users who are Nevada consumers to request that their personal information not be sold (as defined under applicable Nevada law), even if their personal information is not currently being sold. Requests may be sent to us at the address below under “Contact Us” and are free of charge.

10. Changes To This Privacy Policy

This Privacy Policy replaces all previous disclosures we may have provided to you about our information practices with respect to the Services. We reserve the right, at any time, to modify, alter, and/or update this Privacy Policy, and any such modifications, alterations, or updates will be effective upon our posting of the revised Privacy Policy. We may change the provisions of this Privacy Policy at any time, and will always post the most up-to-date version on our website. Your continued use of the Services following our posting of any revised Privacy Policy will constitute your acknowledgement of the amended Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

11. Opt Out

Where consent is the basis of processing, you may at any time withdraw the consent you provided for the processing of your personal information for the purposes set forth in this Privacy Policy by contacting us at the address below under “Contact Us”. provided that we are not required by applicable law or professional standards to retain such information. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent. You can also contact us at any time to update your marketing preferences. You can opt out of marketing communications from us at any time by using the “unsubscribe” link in any marketing email or by contacting us at the address below under “Contact Us”. Please be advised that you may not be able to opt-out of receiving certain service or transactional messages from us, including legal notices.

Contact Us

If you have questions or comments about the Privacy Policy or pWin.ai’s data collection in general, please send us an email at: info@pwin.ai or via postal address at:

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1751 Pinnacle Drive, Suite 1700, McLean, VA 22102
Attn: Privacy Officer
Phone: (703) 860-7800