

COMPLIANCE WITH U.S. DATA PRIVACY LAWS

1. Compliance with U.S. Data Privacy Laws.

Exigyn complies with applicable United States data privacy laws in connection with the processing of personal information through our SaaS Services, including the California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA), and other applicable state privacy laws.

Data We Process

In the course of providing SaaS Services to the Client, Exigyn may process the following categories of personal information on behalf of the Client, as a service provider or processor:

- Account and contact data (names, work email addresses, organization identifiers)
- Financial and operational planning data entered into the platform by or on behalf of the Client
- Usage and diagnostic data required to operate and secure the service

Exigyn does not: sell personal information to third parties; use personal information for cross-context behavioral advertising; process sensitive personal information beyond what is strictly necessary to perform the services; or retain personal information longer than necessary to fulfill the purposes outlined in our Privacy Policy and this Agreement.

Service Provider Obligations

Where applicable under U.S. privacy laws, Exigyn acts as a “service provider” or “processor” with respect to personal information it processes on behalf of the Client. Exigyn:

- Processes personal information only for the business purpose of performing the SaaS Services and as otherwise permitted by applicable law;
- Does not retain, use, or disclose personal information for any commercial purpose other than providing the services;
- Does not combine personal information received from the Client with personal information received from other sources, except as permitted by applicable law;
- Implements reasonable technical and organizational security measures appropriate to the risk of processing;

- Notifies the Client without undue delay upon becoming aware of a personal information breach;
- Assists the Client in fulfilling its obligations to respond to consumer rights requests under applicable U.S. privacy laws;
- Deletes or returns personal information upon request or upon termination of the Agreement; and
- Makes available to the Client all information necessary to demonstrate compliance with applicable U.S. privacy laws.

Sub-processors

Exigyn uses the following sub-processors in the delivery of its SaaS Services. Each sub-processor is subject to appropriate data processing terms:

- Clerk Technologies, Inc. — user authentication and identity management
- Supabase, Inc. — database hosting (United States region)
- Stripe, Inc. — subscription billing and payment processing
- Vercel, Inc. — application hosting and content delivery

Exigyn will notify Client of any material changes to its sub-processor list in advance of implementing such changes, providing Client a reasonable opportunity to object.

Consumer Rights Requests

To the extent Exigyn receives a consumer rights request directed to Exigyn that relates to personal information processed on behalf of Client, Exigyn will promptly notify the Client and take direction from Client on how to respond in accordance with applicable law. Client is responsible for responding to consumer rights requests regarding personal information it controls.

Contact

Questions about Exigyn's privacy practices or this document may be directed to: privacy@exigyn.com