# **Privacy Policy**

Last Updated: December 7, 2025

Introduction: Welcome to the Hailey AI website. This Privacy Policy describes how Hailey AI (operated by TechSiora) collects, uses, and protects personal information when you use our website and services. It applies to all visitors and users of our site, including both individual consumers (B2C) and business clients (B2B).

We are committed to protecting your privacy and adhering to applicable U.S. federal and state privacy laws, including the California Consumer Privacy Act (CCPA). No user account creation is required to use our site or our chatbot, and you may interact with Hailey AI as a guest. We also want to be transparent that we do not use third-party advertising or analytics trackers on our website, and we do not share your personal data with external parties for their own use. All data tracking on our site (such as chatbot usage) is done internally for the purposes described in this policy.

By using the Hailey AI website, you acknowledge that you have read and agree to the practices outlined in this Privacy Policy. If you do not agree with our policies and practices, please do not use our site. If you have any questions or concerns about how your information is handled, feel free to contact us at **info@techsiora.com**.

### Information We Collect

We only collect personal information that is necessary to provide and improve our services. The types of information we may collect include:

- Information You Provide Directly: When you interact with our site or communicate with us, you may voluntarily provide personal information. This includes:
- Contact Information: If you contact us (for example, by email or through a contact form), or if you are a business client requesting information, we may collect your name, email address, company name, phone number, or other contact details so we can respond to you.
- Chatbot Interactions: If you use the Hailey AI chatbot on our website, any information or questions you enter into the chatbot are collected. This may include the text of your inquiries or messages. (Please avoid sharing sensitive personal details in the chatbot.) These chat logs are stored internally so that the chatbot can function and we can review interactions to improve our services.
- Payment Information: If you make a purchase or payment through our site, we will collect information necessary to process the transaction. We use PayPal as our payment processor, so we do not collect or store your credit card numbers or financial account details directly. However, PayPal may provide us with certain information about the transaction, such as your name, email, billing/shipping address (if applicable), and the amount paid, to confirm payment and fulfill your order.
- Other Information You Choose to Provide: If you fill out any forms, respond to surveys, or otherwise send us information (for example, requesting a demo or submitting feedback), we will collect whatever personal information you provide in those communications.
- Information Collected Automatically: When you visit our website, we automatically collect some information about your device and how you use the site. This information helps us to keep the website secure and to understand usage. It may include:
- Technical Identifiers: Your Internet Protocol (IP) address, browser type, device type, operating system, and device identifiers. We use this data for security (e.g., to detect malicious activity) and to optimize our site for different devices and browsers.
- Usage Data: Details about your interactions with our site, such as the pages or content you view, the dates and times of your visits, the time spent on pages, and the page that referred you to our site (for example, a search engine or link). If you use the chatbot, we might log the time of your chat and basic usage metrics (like how many queries you made). This data is generally collected in aggregate form and is not used to identify you personally.
- Cookies and Similar Technologies: We use first-party cookies (small text files stored on your browser) and similar technologies to make our site function properly and to track aggregate usage. For example, a cookie might be used to remember your chatbot session or to save your preferences (such as acknowledging our cookies banner). These cookies do not collect personal details beyond what is needed for functionality. We do not use any third-party cookies or tracking scripts (such as advertising trackers or external analytics platforms). For more information, please see our separate Cookies Policy.

We do not collect sensitive personal information (such as social security numbers, driver's license numbers, financial account passwords, biometric data, or health information) through our website. We also do not intentionally collect any information from children under the age of 13 (see **Children's Privacy** below).

### How We Use Your Information

We use the collected information for the following purposes, all in accordance with applicable laws:

- **Providing and Improving Our Services:** We process your information to operate the website and the Hailey AI chatbot, and to give you a smooth user experience. For example, the chatbot uses the content you input to generate a response. We may also use your chat inquiries and site usage data to debug issues, analyze performance, and enhance our services over time
- Communication: We may use your contact information to respond to your inquiries, support requests, or feedback. If you are a business client or have requested information about our services, we will use your details to communicate with you about demos, proposals, or updates. We will not send you marketing emails unless you have opted in to receive them. (And you can opt out at any time see Your Rights and Choices below.)
- Transactions and Payments: If you make a payment through our site (processed by PayPal), we will use the information about the transaction to fulfill your order or service. For example, we might need to confirm that your payment was received and provide you with an invoice or receipt. We also maintain records of transactions for accounting, tax, and audit purposes.
- Analytics and Internal Improvement: We internally analyze how our site and chatbot are used in order to improve performance and features. For instance, we might review
  aggregated data like the total number of visitors, general usage patterns, or common questions asked to the chatbot. This helps us understand what content or features are most
  useful to users. Importantly, this analysis is done using first-party data only. We do not use external analytics services that track you across other sites; all analysis is kept in-house
  and data is not shared externally.
- Security and Fraud Prevention: Information (especially technical data like IP addresses and logs of site activity) may be used to monitor for fraudulent, abusive, or illegal activity on our website. This helps us protect the integrity of our site and the safety of our users. If we detect potential security threats or attempts to misuse our systems, we may use and preserve relevant data to investigate and prevent harm.
- Legal Compliance: We may use or disclose your information as needed to comply with applicable laws and regulations, or to respond to lawful requests and legal processes (for example, a court order or subpoena). We may also use your data to enforce our Terms & Conditions or to establish or exercise our legal rights or defend against legal claims.

We will only use your personal information for the purposes above or for compatible purposes that are disclosed to you. If we need to use your information for a purpose materially different from the ones listed, we will seek your consent or provide notice as required by law.

## Cookies and Tracking Technologies

As noted, our website uses a few essential cookies and similar technologies to function effectively, but we do not use any third-party or advertising cookies. All cookies and tracking on the Hailey Al website are implemented by us for our own purposes only. For instance, we may use:

- Session Cookies: to maintain your session on the site (for example, keeping the state of your chatbot conversation so you can navigate the site without losing context).
- Preference Cookies: to remember choices you make (such as dismissing a notification so it doesn't show again, or remembering that you've seen a certain message).
- Security Cookies: to help protect our site (for example, to determine if a request is coming from a legitimate user and not a bot, or to prevent cross-site request forgery).

These cookies are typically small text files stored on your device. They are used only by our website and do **not** involve any external advertising networks or analytics providers. We do not share cookie data with any third parties.

You can control or delete cookies using your browser settings. However, please note that if you disable cookies entirely, some features of our site (such as the chatbot or other interactive features) may not work properly. For more details on how we use cookies and how you can manage them, please see our **Cookies Policy**.

Our site does not respond to "Do Not Track" (DNT) signals from web browsers, primarily because we do not engage in tracking users across third-party websites. We limit our data collection and use as described in this policy for all users, regardless of any DNT signal.

### How We Share Your Information

We value your privacy. Therefore, we do **not** sell, rent, or trade your personal information to third parties for their own marketing or other independent use. We also do not share your data with any third-party analytics or advertising services. We will only share or disclose personal information in a few specific circumstances, such as:

- Service Providers (Processors): We may share information with trusted third-party service providers who perform services on our behalf, but only to the extent necessary for
  them to carry out their work. The primary example is PayPal, which processes payments for us. When you make a payment, you will be redirected to PayPal, which will handle your
  financial information securely. PayPal then provides us with confirmation of your payment and basic details like your name, email, and transaction amount. We may also use other
  vendors for services like website hosting, email delivery, or technical support. These service providers are bound by contractual obligations to use personal information only for
  providing services to us and to protect it.
- Legal Requirements and Safety: We may disclose personal information if required to do so by law or if we believe in good faith that such action is necessary to comply with legal obligations. This includes situations like responding to subpoenas, court orders, or lawful requests by government authorities. We may also share information if we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to anyone's safety, or violations of our Terms & Conditions or other agreements.
- **Business Transfers:** If TechSiora (the company operating Hailey AI) is involved in a merger, acquisition, sale of assets, bankruptcy, or other business transaction, personal information may be transferred to a successor or affiliate as part of that transaction. In such an event, we would seek to ensure that your information remains protected by this Privacy Policy (or you are given notice and an opportunity to opt out of any materially different handling).
- With Your Consent: In cases where you explicitly consent or request that we share your information, we will do so. For example, if you ask us to refer you to a partner or you consent to our posting of a customer testimonial that includes your name, we will share information only as directed by you.

Aside from the situations above, we do not disclose your personal data to any third parties. Specifically, we do not provide your information to third-party advertisers, data brokers, or social media companies for their independent use.

### **Data Security**

We take the security of your personal information seriously. We implement appropriate technical and organizational measures to protect your data against unauthorized access, alteration, disclosure, or destruction. These measures include using secure server environments, **encryption** of data in transit (our site is served over HTTPS/TLS), firewall protection, and limiting access to personal data to only those employees or contractors who need it to perform their job duties.

However, please understand that no method of transmission over the Internet or method of electronic storage is 100% secure. **We cannot guarantee absolute security** of your information. Although we strive to protect your personal data, there is always a residual risk that unauthorized third parties could find a way to defeat our security measures. You share and communicate information at your own risk.

If we learn of a data breach that compromises the security of your personal information, we will notify you and the appropriate authorities as required by law.

To help protect your own privacy, we advise that you do not share any account passwords or sensitive personal information through insecure channels. (Note: Currently we do not have user accounts on our site, but this advice applies generally to your interactions on any website.)

## **Data Retention**

We retain personal information only for as long as necessary to fulfill the purposes described in this Privacy Policy, unless a longer retention period is required or permitted by law.

For example: - Chatbot Logs and Usage Data: We retain chatbot conversation logs and usage data for as long as needed for troubleshooting, analysis, and improvement of our services. These logs may be periodically reviewed and purged or anonymized when they are no longer useful. If you would like us to delete specific chat logs associated with you, you may request that (see Your Rights below) and we will do so unless we have a compelling reason or legal obligation to keep them. - Contact Information: If you provide us with contact details (e.g., via a contact form or support request), we will retain that information for as long as needed to respond to you and carry out any relationship we have with you. If you become a customer or vendor, we may retain your contact information throughout the duration of our business relationship and as required for administrative or legal purposes (e.g., record-keeping, compliance). - Transaction Data: We keep records of payments and transactions (amounts, dates, associated names/emails) to comply with accounting standards, tax laws, and anti-fraud regulations. These may be retained for a number of years (often 7 years for financial records, depending on jurisdiction and accounting rules). - Legal Compliance: We may retain any information as required by law or as necessary to resolve disputes or enforce our agreements. For instance, if we receive a legal hold or preservation order, we will retain relevant data until it is lifted.

When we have no ongoing legitimate business need or legal requirement to process your personal information, we will either delete it or anonymize it. If deletion is not immediately feasible (for example, because the data is stored in archives or backup systems), we will store it securely and isolate it from further use until deletion is possible.

## Your Rights and Choices

You have certain rights and choices regarding your personal information. We are committed to respecting these rights and enabling you to exercise them:

- Access and Correction: You may request information about the personal data we hold about you and ask that we correct or update any inaccuracies. We will provide you with a copy of your personal information in our records (in a commonly used format, if required), and correct any errors, subject to verification of your identity.
- **Deletion:** You can request that we delete personal information we have collected from you. For example, you may ask us to remove your contact information from our database or delete chatbot conversation logs linked to you. We will honor deletion requests to the extent possible, but please note there may be legal exceptions (for instance, we may retain information needed for a transaction you initiated, or information required to comply with a legal obligation, or if the information is stored in backups that are not easily accessible).
- Opt-Out of Marketing Communications: If you have subscribed to any optional communications (such as a newsletter or marketing emails), you can opt out at any time. Simply follow the unsubscribe instructions in those emails or contact us at info@techsiora.com to be removed from our mailing list. (Note: We do not currently send mass marketing emails without consent. Transactional or service-related communications, such as payment confirmations or customer support responses, are not marketing messages and may be sent as needed.)
- Cookies & Tracking Choices: As described above in "Cookies and Tracking Technologies," you can adjust your browser settings to refuse cookies or alert you when cookies are being used. Please refer to our Cookies Policy for more detailed information on how to manage cookies and what effect that may have on your experience.
- California Privacy Rights: If you are a California resident, you have specific rights under the CCPA (and the California Privacy Rights Act, "CPRA," which amends the CCPA). These include:
- Right to Know: You can request that we disclose what personal information we have collected, used, and disclosed about you over the past 12 months. This includes the categories of personal information, the sources of that information, the business or commercial purpose for collection, and the categories of third parties with whom we shared personal information (if any).
- Right to Access: You can request a copy of the specific pieces of personal information we have collected about you in the past 12 months.
- Right to Delete: You can request that we delete personal information we have collected from you (with certain exceptions as allowed by law for example, we may retain information needed to complete a transaction you requested or to comply with a legal obligation).
- Right to Correct: You can request that we correct inaccurate personal information we maintain about you.
- Right to Opt-Out of Sale or Sharing: You have the right to opt out of the "sale" of your personal information or the sharing of your personal information for cross-context behavioral advertising. Note: We do not sell personal information to third parties, and we do not share your personal information for targeted advertising purposes. Therefore, we do not provide a "Do Not Sell or Share My Personal Information" link, as it is not applicable. We confirm that in the past 12 months we have not sold or shared personal information as those terms are defined under California law.
- Right to Non-Discrimination: We will not discriminate against you for exercising any of your California privacy rights. This means we will not deny you services, charge you a different price, or provide a different level of service because you made a privacy request. (If you exercise a right that makes it impossible for us to provide a certain service e.g., asking us to delete all your data might end our ability to have an ongoing subscription we will inform you of the consequences, but we will not retaliate or impose unlawful penalties.)

Notice of Collection (California): In the preceding 12 months, we have collected the following categories of personal information (as defined by CCPA) from California consumers: identifiers (such as name, email, IP address), internet or other electronic network activity information (such as browsing behavior and interactions with our website or chatbot), and potentially professional or employment-related information if you provided a company name or title. We collect these categories directly from you (through our website and interactions) and use them for the business purposes described in How We Use Your Information (for example, to provide services, communicate with you, secure our site, and improve our offerings). We do not sell or share this information with third parties except with service providers for our internal purposes (as described in How We Share Your Information).

"Shine the Light" (California Civil Code §1798.83): California residents may request information about whether we have disclosed personal information to any third parties for their direct marketing purposes. As stated earlier, we do not share personal information with third parties for their own direct marketing use. If you have specific questions about this, you can contact us to obtain further information.

- Other State Privacy Rights: Residents of certain other states (such as Virginia, Colorado, Connecticut, and others with new privacy laws) may have similar rights to those listed above (access, correction, deletion, opt-out of certain data uses). We will honor valid requests in accordance with applicable state laws. For example, if you are a Virginia resident, you have the right to access and delete your data and opt out of certain processing (though we do not sell data or process sensitive data without consent), and you have a right to appeal our decision if we decline to fulfill a request. If you have questions about your specific state's rights, please contact us.
- International Users: Our Website and services are intended for users in the United States. If you are using the site from outside the U.S., you may have rights under your local laws (like the GDPR in Europe). While this policy is focused on U.S. law, we will also strive to honor requests from international users to the extent feasible and consistent with our legal obligations. For example, European users may have rights to access, rectify, or delete data under GDPR. If you are an international user, you can still contact us to exercise your rights, and we will let you know what we can do under our operational and legal framework.

To exercise any of your rights or make any requests regarding your personal data, please **contact us at info@techsiora.com**. Please describe your request clearly and provide enough information for us to verify your identity (for example, we might ask you to provide the email address you used to contact us, or other details we have on file). We will respond to your request within the timeframe required by law (for CCPA, typically within 45 days) and will let you know if we need additional time or information. If we cannot fulfill your request (for instance, if it falls under an exemption or we cannot verify your identity), we will explain the reason.

For California (and some other state) requests: If you choose to use an **authorized agent** to submit a request on your behalf, we will require proof of the agent's authorization (such as a written permission from you) and still take steps to verify your identity directly with you, as permitted by law.

We will not charge you for making a request unless it is manifestly unfounded or excessive. If we are allowed to charge a fee in such case, we will inform you beforehand.

## Children's Privacy

Our website and services are **not directed to children**, and we do not knowingly collect personal information from individuals under the age of 13. In accordance with the U.S. Children's Online Privacy Protection Act (COPPA) and other applicable laws, if we become aware that we have inadvertently collected personal information from a child under 13 years old without verifiable parental consent, we will take immediate steps to delete that information from our records.

If you are under 13, **please do not use the Hailey AI website or provide any personal information to us**. If you are between 13 and 17 years old, you should only use our site with permission and supervision from a parent or guardian. While our site is generally not intended for anyone under 18 (as our Terms & Conditions require users to be 18+ or have guardian consent), we particularly want to prevent the collection of data from children under 13.

Parents or guardians: If you discover that your child under 13 has provided personal information to us (for example, by using the chatbot or sending an inquiry), please contact us at info@techsiora.com. We will promptly review and delete the information, and take any other necessary steps to comply with applicable law.

# Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technologies, legal requirements, or for other operational reasons. When we make changes, we will revise the "Last Updated" date at the top of this policy. If the changes are significant, we will provide a more prominent notice of the update – for example, by posting a banner on our website or, if we have your email contact and the change materially affects you, we might notify you via email.

We encourage you to review this Privacy Policy periodically to stay informed about how we are protecting your information. Your continued use of the Hailey Al website after any changes to this Privacy Policy constitutes your acceptance of the revised policy.

## Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy or how we handle your personal information, please contact us:

- Email: info@techsiora.com
- Mailing Address: TechSiora (Hailey AI) 11175 Reston Station Blvd, Reston, VA 20190, USA

We will be happy to assist you and answer any questions you may have about your privacy and our data practices. Your privacy is important to us, and we will address your inquiries promptly and to the best of our ability.