

REPAIROTTER PRIVACY POLICY

Last Updated: February 28, 2025

This privacy policy (“**Policy**” or “**RepairOtter Policy**”) describes how **Tractable Inc.** (“**us**”, “**we**”, “**our**”) collects, uses, transfers and discloses personal information that you provide on REPAIROTTER.COM (“**RepairOtter**”).

By voluntarily providing your personal information to us using RepairOtter, you agree to this Policy. If you do not agree to the terms of this Policy, please do not submit any personal information to us, or use those choices we describe in this Policy such that you agree to our processing of your information.

The RepairOtter website uses BotPress to power the RepairOtter AI chatbot. A copy of BotPress’s privacy policy can be found at: <https://botpress.com/legal/privacy-statement>

The RepairOtter website is only intended for use by individuals in the United States.

This Policy may be amended from time to time. When this happens, we will make available an updated version of this Policy. Please review the Policy each time you voluntarily provide us with personal information and/or you use the Estimator Tool.

This Policy applies only to information collected through the use of the RepairOtter.com website.

The following is a short summary of the key elements of this Policy. You can read the full version of the Policy following the summary.

SUMMARY OF PRIVACY POLICY

We may collect the following personal information when you provide it to us, or as otherwise stated in this Policy:

- First and last name
- Physical Address
- Phone number
- Email address
- Photos of your vehicle
- Your Vehicle Identification Number (VIN)

We may use your personal information for the following purposes:

- To provide you with the use of the RepairOtter.com website;
- To resolve your issues or to provide answers to inquiries;

- To send you notifications;
- To ensure the RepairOtter.com website remains functioning and secure; and
- To protect our rights;
- To comply with any applicable law and assist law enforcement agencies as required.

We may disclose your personal information to the following parties:

- BotPress.com
- Our employees, external processors and service providers;
- Independent third parties such as our lawyers, advisors or other persons to whom we are authorized or required to disclose your personal information under applicable law.

Contact Us:

For more information on our Policy, our privacy practices, or to exercise your rights in relation to your personal information, please contact us at:

PRIVACY@TRACTABLE.AI

FULL VERSION OF THE PRIVACY POLICY

This Policy covers the following:

1. Consent
2. Collection and Use of Personal Information
3. Disclosure of Personal Information
4. Security
5. Storage and Transfers of Personal Information
6. Retention of Personal Information
7. Children
8. Your Rights Related to Your Personal Information
9. Links to Other Websites
10. Updates to Privacy Policy
11. Questions, Complaints and Contact Information

1. Consent

We only collect, use, transfer and disclose personal information with your consent or as otherwise permitted or required by applicable laws.

We collect personal information only when you provide it to us through registration, inquiries or requests, or as otherwise stated within this Policy. If you choose not to provide any requested personal information, you may be unable to use the technical functionalities of the RepairOtter.com website.

When you provide us with personal information in connection with the RepairOtter.com website, you consent to our use of it as set out in this Policy.

2. **Collection and Use of Personal Information**

Personal information means any information about an identifiable individual. This includes any information that relates to you and identifies you personally, either alone or in combination with other information. We may collect various types of personal information, including:

- First and last name
- Physical Address
- Phone number
- Email address
- Photos of your vehicle
- Your Vehicle Identification Number (VIN)

We may process your contact information (including first name, last name, email address) photos and vehicle information when you provide such information in fillable forms or on the RepairOtter.com website, to provide you with answers to your inquiries regarding automotive damage and repairs. We may also use this information to train and improve the RepairOtter.com services, including AI models.

3. **Disclosure of Personal Information**

We may retain third parties to assist us in performing our services. Such third parties may be provided with access to your personal information to perform their obligations pursuant to contractual obligations with us, but for no other purpose. Where possible, we will provide you with more details about specific third parties, including third-party data processors and service providers to whom we may disclose your personal information to provide services to us and for the purposes as outlined in this Privacy Policy.

(a) **Our Employees, External Processors and Service Providers**

The recipients of your personal information will be our employees as well as external data processors processing your personal information on our behalf and external service providers providing specific services. They will be given access to your personal information on a 'need-to-know' basis in order to fulfil their duties and/or contractual obligations, being subject to the obligations of confidentiality under internal policies and/or after signing appropriate legal documents, where relevant.

We additionally may share your personal information provided through the RepairOtter AI chat bot with BotPress Inc.

(b) **Independent Third Parties, Legal Obligations**

We may disclose your personal information to our lawyers and other persons to whom we are authorized or required to disclose under relevant laws. We may disclose your personal information to comply with any court order or legal obligation, including responding to any lawful government or regulatory request, or if we believe disclosure is necessary to enforce or protect our or a third party's rights, property, or safety.

We may disclose your personal information in the event of or during a merger, divestiture, restructuring, dissolution, or other sale or transfer of some or all of our assets or equity, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

Additionally, we may disclose your personal information for any other purpose disclosed by us when you provide the information or as otherwise permitted or required by applicable law.

4. **Security**

We use physical, technical and organizational security precautions to protect your personal information from manipulation, loss, destruction or access by unauthorized persons.

Due to the nature of Internet communications, we cannot guarantee that such communications are 100% secure or error-free. We cannot guarantee that the information you provide us will remain free from theft, loss, or unauthorized access or use by third parties, despite our best efforts. You are responsible for maintaining the privacy of any usernames, passwords or other special access numbers you might use to access the Website.

5. **Storage and Transfers of Personal Information**

We may store, process and/or transfer your personal information outside your jurisdiction of residence, including to the United States, United Kingdom, European Union, and India, where it may be stored or processed for any of the purposes set out in this Policy. Consequently, your personal information may be subject to local laws of the jurisdiction to which it is transferred, and it may be accessible to local governments, tribunals, law enforcement and regulatory agencies. If you have any questions regarding our international transfers of personal information, you may contact us using the information below.

6. **Retention of Personal Information**

We will retain your personal information for so long as is necessary to fulfill the purpose for which it was collected and to meet our legal and contractual obligations. This period may extend beyond the end of your relationship with us but it will be only for so long as it is necessary for us to have sufficient information to respond to any issues that may arise at a later date.

7. **Children**

Children under the age of 13 are not the intended audience for the RepairOtter website. In light of the importance of protecting children's privacy, we do not knowingly collect personal information from persons under the age of 13 without prior parental or legal guardian consent.

8. **Your Rights Related to Your Personal Information**

If you wish to exercise any of your rights under this Policy, please submit a written request to us using our contact information in Section 11 of this Policy. Your rights may include:

- **Withdrawing Consent:** If you have given consent to the processing of your personal information for one or more purposes, you are entitled to withdraw your consent at any time (without affecting the lawfulness of any information processing that took place before the withdrawal of consent).
- **Access and Correction:** You may access personal information which we hold about you, correct any inaccurate personal information about you and/or complete any incomplete personal information about you. You are entitled to access your personal information, subject to the

restrictions on access that are set out in relevant laws and subject to fees applicable under relevant laws, where permitted. We may require you to verify your identity before we allow you to access your personal Information.

- **Additional Rights:** Under certain circumstances and subject to applicable data protection laws, you may also be entitled to request additional information regarding our data governance practices, including details regarding what information is collected about you, the categories of persons who have access to your information, and how long your information will be retained for. You may also be entitled to request that we cease communicating your information, or de-index any hyperlink attached your name that provides access to your personal information by a technological means.

9. **Links to Other Websites**

We may provide links to third-party websites or resources, or third-party information referencing or linking to third-party websites or resources. When you follow such a link, you are no longer protected by our Policy, and we encourage you to read the privacy statements or other disclaimers of such other parties. We are not responsible for the privacy or security practices or the content of external websites, services or products.

10. **Updates to Privacy Policy**

We reserve the right to modify our Policy at any time. Please review the Policy each time you access the Website. Material changes will be indicated on the revised Policy. Any changes will be effective immediately as of the updated revision date indicated above.

11. **Questions, Complaints and Contact Information**

If you have any questions or comments regarding our privacy practices, procedures and guidelines or those of our third-party data processors or service providers, please do not hesitate to contact us at:

Privacy@tractable.ai

If you are not satisfied with the way your personal information is handled, with the information you receive, or with any other aspect relating to the protection of your personal information, please reach out directly to us using the contact details above. If we are unable to resolve your privacy concerns, you have the right to complain to the [Office of the Privacy Commissioner of Canada\(link is external\)](#) (if in Canada) or the relevant privacy authority in your jurisdiction of residence.

Various National, State, or Provincial consumer privacy laws may provide their residents with additional rights regarding our use of their personal information.

US jurisdictions, including California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Montana, Oregon, Tennessee, Texas, Utah, and Virginia provide (now or in the future) their state residents with rights to:

- Confirm whether we process their personal information.
- Access and delete certain personal information.
- Correct inaccuracies in their personal information, taking into account the information's nature processing purpose (excluding Iowa and Utah).

- Data portability.
- Opt-out of personal data processing for:
 - targeted advertising (excluding Iowa);
 - sales; or
 - profiling in furtherance of decisions that produce legal or similarly significant effects (excluding Iowa and Utah).
- Either limit (opt-out of) or require consent to process sensitive personal data.

The exact scope of these rights may vary by state. To exercise any of these rights please contact us at privacy@tractable.ai.