Privacy Policy

Last updated: November 13, 2026

Ponder Technologies Inc. (“Company”, “we”, “our”, or “us”) respects your privacy and is committed to protecting it through our compliance with this policy. This policy describes how we collect, process, retain, and disclose personal data about you when providing services to you through our websites, applications, products, and services that link to this policy (our “Services”) and our practices for using, maintaining, protecting, and disclosing that information.

This policy applies only to information we collect:

- Through the Services.
- In communications, including email, text, chat, and other electronic messages, between you and the Services.
- When you interact with our advertising and applications (including mobile apps) on third-party websites and services, if those applications or advertising include links to this policy.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by Company or any third party that does not link to this policy; or
- Any third party, including through any application or content (including advertising) that may link to or be accessible from or through the Services.

Please read this policy carefully to understand our policies and practices regarding your information and how we treat it. If you use Ponder for client work, the section “Your Footage and Projects” explains exactly what we do with what you upload. By interacting with our Services or providing us with your information, you agree to the collection, use, and sharing of your information as described in this privacy policy. We may provide additional or different privacy policies that are specific to certain features, services, or activities.

This policy may change from time to time (see Changes to Our Privacy Policy). Your continued use of the Services after we make changes as described here is deemed to be acceptance of those changes, so please check the policy periodically for updates.

Data We Collect

Children’s and Minors’ Data

Our Services are not intended for, and we do not knowingly collect any personal data from, children under the age of 18. If we learn we have collected or received personal data from a child under 18 years old without verification of parental consent, we will delete that information.

The Personal Data That We Collect or Process

“Personal data” is information that identifies, relates to, or describes, directly or indirectly, you as an individual, such as your name, email address, telephone number, home address, or payment

information.

The types and categories of personal data we may collect or process include:

Category	**Examples**	**Source**	**Purpose**	**Sharing / Disclosure**
Identifiers	Name, email, phone number, IP address, account ID	Provided directly by you, website/app	Account management, communication, service delivery	Service providers that help us run Ponder
Personal Information	Billing info and payment data	Direct submission	Order fulfillment, payment processing	Payment processor
Internet / Network Activity	Browsing behavior, pages viewed, click data, device info	Automatically collected via website/app	Analytics, service improvement, personalization	Analytics providers
Geolocation Data	Approximate location (city level)	IP address	Service availability, security	Service providers
Professional / Employment Info	Job title, company	User-submitted profiles	Service eligibility, communications	Internal use only
Commercial Information	Purchase history and transaction records	Direct submission	Billing, service improvement	Payment processor

Some of the information identified above may be considered sensitive data under certain laws. If required under applicable law, we will collect and process sensitive personal data only with your consent. If you choose not to provide or allow us to collect some information, we may not be able to provide you with requested features, services, or information.

We also collect:

- **Customer Content.** The footage, audio, images and other files you add to Ponder, and everything made from them. See “Your Footage and Projects” below for how we handle it.
- **Statistics or aggregated information.** Statistical or aggregated data does not directly identify a specific person, but we may derive non-personal statistical or aggregated data from personal data. For example, we may aggregate personal data to calculate the percentage of users accessing a specific Services feature.
- **Technical information.** Technical information includes information about your internet connection and usage details about your interactions with the Services, such as clickstream information to, through, and from our Services (including date and time), products that you view or search for; page response times, download errors, length of your visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), or methods used to browse away from a page.

If we combine or connect non-personal statistical or technical data with personal data so that it directly or indirectly identifies an individual, we treat the combined information as personal information.

Your Footage and Projects

"Customer Content" means the media you add to Ponder and everything made from it: proxies, frames, audio, thumbnails, transcripts, timelines, exports, style profiles, project memory, your chats with the agent and files you attach. It often includes your clients' material and the people who appear in it.

Your original files stay on your computer. Ponder uploads smaller proxy copies, audio and thumbnails so the agent can watch, transcribe and edit. If a proxy can't be made, the original file may be uploaded instead.

You and your clients keep all rights in your Customer Content. We use it only to provide Ponder to you: to analyze, transcribe, edit, render, store and share it as you direct, to give support you ask for, to address security incidents or abuse, and to comply with law.

We do not train on your footage or your client work. Ponder does not use Customer Content to train or fine-tune AI models, and does not allow its providers to use it for training, fine-tuning or general model improvement. This applies to every plan, free or paid.

We do not sell Customer Content or use it for advertising or marketing.

Ponder staff access Customer Content only when you ask for support, to investigate security or abuse, or when the law requires it.

Anyone with a share link you create can view that cut until you turn the link off.

Customers on Ponder's Enterprise Terms of Service (ponder.ai/enterprise-terms.pdf) also get the commitments in those terms and in the Data Processing Addendum, including their deletion and breach-notice timelines. Where those terms differ from this policy, they control for that customer.

How We Collect Your Personal and Other Data

You Provide Information to Us

We collect information about you when you interact with our Services, such as when you create or update an account, or create, upload, or post content to the Services, including reviews, media such as photos, videos, or audio recordings.

Automatically Through Our Services

As you navigate through and interact with our Services, we may use automatic data collection technologies to collect information that may include personal data. Information collected automatically may include usage details, IP addresses, operating system, and browser type, and information collected through cookies and other tracking technologies.

We may use these automatic collection technologies, such as Google Cloud and Posthog, to collect information about your online activities over time and across third-party sites or other online services (behavioral tracking). Using automatic collection technologies helps us to improve our Services and to deliver a better and more personalized experience.

The technologies we use for this automatic data collection may include:

- **Cookies.** A cookie is a small file placed on your device when you interact with the Services. You may refuse to accept or disable cookies by activating the appropriate setting on your browser or device. However, if you select this setting, you may be unable to access certain features of the Services.
- **Web Beacons.** Some parts of the Services may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those parts or and for other related statistics (for example, recording the popularity of certain content and verifying system and server integrity).

To the extent any of these automated technologies are considered a personal data sale, targeted advertising, or profiling, under applicable laws, depending on where you live, you may opt out from use of these automated technologies for such uses by contacting us as indicated below. Please note that some Services or features may be unavailable as a result.

When you interact with the Services, there are third parties that may use automatic collection technologies to collect information about your or your device. These third parties may include:

- Advertisers, ad networks, and ad servers.
- Analytics companies.
- Your device manufacturer.
- Your internet or mobile service provider.

These third parties may use tracking technologies to collect information about you when you use the Services. The information they collect may be associated with your personal data or they may collect information, including personal data, about your online activities over time and across different websites, apps, platforms, and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content. We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

From Business Partners and Service Providers

We may receive personal data about you from other sources and combine that with information we collect directly from you. For example, we may obtain information about you from service providers that we engage to perform services on our behalf, such as payment processors. We also may receive personal data from business partners that we engage to share consumer information with us.

Social Media and Other Sites

When you interact with us on social media platforms, any data you provide to those platforms is governed by their privacy policies. We do not control how social media platforms collect, use, or share your information. Our Services may contain links to other websites that are not operated by us. 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 site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal data, to:

- Provide you with the Services and any contents, features, information, products, or services that we make available through the Services.
- Manage your registration as a user of the Services.
- Contact you by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the Services.
- Attend and manage your requests to us.
- Fulfill any other purpose for which you provide it.
- Improve our Services, including by analyzing your information and creating aggregated data derived from your information) to develop, maintain, analyze, improve, optimize, measure, and report on our Services and their features and how users interact with them. This analysis uses usage data, such as which features are used and how often. It never uses Customer Content to train or fine-tune AI models.
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us.
- Notify you when Services updates are available and about changes to any products or services we offer or provide though them.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may use your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal data held by us about the users of our Services is among the assets transferred.

Use of Artificial Intelligence

We may use artificial intelligence ("AI") technologies, including machine learning models and automated decision-making systems, to support and improve our Services. These tools may assist with functions such as analyzing data, enhancing user experiences, improving content or recommendations, detecting security or technical issues, and optimizing our operations. When we use AI, we do so in ways designed to respect your privacy and comply with applicable laws. Our use of AI may involve:

- Processing usage data, never Customer Content, to test and improve how our Services work.
- Using AI-based tools provided by trusted third-party vendors (for example, to detect fraudulent activity or assist with customer support).
- Generating insights or summaries from aggregated or de-identified information.

We do not use AI systems to make decisions that produce legal or similarly significant effects about you without meaningful human involvement. We also take steps to avoid using personal data in a way

that would result in automated profiling that could unfairly affect you. Where required by law, we will provide additional notice or obtain your consent before using your information for AI-related purposes.

Who We Disclose Your Information To

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We never sell Customer Content or share it with advertising partners.

We may also disclose personal data that we collect, or you provide as described in this privacy policy:

- To our subsidiaries and affiliates.
- To service providers that help us run Ponder, such as cloud hosting, AI model, transcription, analytics and payment providers. They may use your information only to provide their services to us, and they may not use Customer Content to train their models.
- To advertising partners, such as Meta, to measure and improve our ads. We share a hashed (scrambled) version of your email address and a user identifier, together with the fact that you signed up, exported a second project, started a trial or made a first payment. On our website, the Meta pixel may record page visits and clicks on download links. We do not do this for people located in the European Economic Area, the United Kingdom or Switzerland.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal data held by the Company is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal data:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our Terms of Use and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of our organization or others.

Your Rights and Choices About Your Information

This section describes mechanisms you can use to control certain uses and disclosures of your information and rights you may have under state law, depending on where you live.

Advertising, marketing, cookies, and other tracking technologies choices:

- **Cookies and Other Tracking Technologies.** You can set your browser to refuse all or some browser cookies or other tracking technology files, or to alert you when these files are being sent. If you disable or refuse cookies or similar tracking files, some Services features may be inaccessible or not function properly. Some browsers include a "Do Not Track" (DNT) setting that can send a signal to the online services you visit indicating you do not wish to be tracked.
- **Targeted Advertising by the Company.** If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target audience preferences, newsletters, marketing or promotional materials and other information that may be of interest to you, you may opt-out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send or by contacting us as provided below.
- **Location Data.** You can choose whether or not to allow the Services to collect and use real-time information about your device's location through the device's privacy settings. If you block the use of location information, some Services features may become inaccessible or not function properly, and you may not be able to use the Services.
- **Deleting Your Content.** You can delete a project in the app, delete your account in Settings → Profile, or email privacy@ponder.ai.

State and International Privacy Rights

United States Residents

Depending on your state of residency, you may have certain rights related to your personal data, including:

- **Access and Data Portability.** You may confirm whether we process your personal data and access a copy of the personal data we process. To the extent feasible and required by state law, depending on your state, data will be provided in a portable format. Depending on your state, you may have the right to receive additional information, and it will be included in the response to your access request.
- **Correction.** You may request that we correct inaccuracies in your personal data that we maintain, taking into account the information's nature and processing purpose.
- **Deletion.** You may request that we delete personal data about you that we maintain, subject to certain exception under applicable law.
- Opt Out of Using Personal Data for Targeted Advertising, Profiling, and Sales. You may request that we do not use your personal data for these purposes.

Important: The exact scope of these rights vary by state. There are also several exceptions where we may not have an obligation to fulfill your request.

To exercise any of these rights, please contact us as provided below.

California Residents

If you are a California resident, you have specific rights regarding your personal information under the California Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA). These rights

include:

- Right to Know / Access: You may request information about the categories and specific pieces of personal information we collect, use, or share.
- Right to Delete: You may request that we delete personal information we maintain about you, subject to certain exceptions under applicable law.
- Right to Correct: You may request that we correct inaccurate personal information we maintain about you.
- Right to Opt-Out of Sale or Sharing: You may request that we do not sell or share your personal information for cross-context behavioral advertising purposes. We do not sell personal information of California residents. We may "share" limited information with advertising partners as described in "Who We Disclose Your Information To". To opt out, email privacy@ponder.ai. Our website also honors Global Privacy Control: when your browser sends it, our website does not load advertising tags.
- Right to Limit Use of Sensitive Personal Information: You may request limitations on the use of sensitive personal information we collect, such as precise geolocation, racial or ethnic data, health information, or financial information.
- Right to Non-Discrimination: You have the right not to be discriminated against for exercising any of your California privacy rights.

Some browsers and browser extensions support the Global Privacy Control (GPC), which can signal your choices to opt-out of the sale or sharing of personal information. When we detect such a signal, we will make reasonable efforts to honor your preferences as required by California law.

To exercise any of these rights, please contact us as indicated below.

European Union / European Economic Area (EU/EEA) Residents

If you are located in the European Economic Area ("EEA"), the United Kingdom ("UK"), or Switzerland, the following additional disclosures apply to the extent the EU General Data Protection Regulation ("GDPR"), the UK GDPR, or similar laws apply to our processing of your personal data. We process your personal data only where we have a lawful basis under applicable data protection law. This means we will collect, use, and share your information only where one or more of the following apply:

- Contractual necessity: To provide and operate the Services and fulfill our obligations under our agreement with you.
- Legitimate interests: To operate, improve, and protect our business and Services (for example, to prevent fraud or analyze usage), provided those interests are not overridden by your data protection rights.
- Consent: When you have given us consent to use your personal data for a specific purpose (for example, receiving marketing communications).
- Legal obligation: When necessary to comply with legal or regulatory requirements.

Your personal data may be transferred to and processed in countries outside of your country of residence, including the United States. We take steps to ensure that such transfers comply with applicable data protection laws and that your information remains protected. Where required, we use appropriate safeguards such as standard contractual clauses approved by the European Commission.

We do not share the personal data of people located in the EEA, the UK or Switzerland with advertising partners, and our website does not load advertising tags for visitors there.

The GDPR provides you with certain rights regarding your personal data. These rights include:

- Right of Access: You may request information about the personal data we hold about you and obtain a copy of that data.
- Right to Rectification: You may request that we correct inaccurate or incomplete personal data we maintain about you.
- Right to Erasure ("Right to be Forgotten"): You may request that we delete your personal data, subject to certain legal and contractual obligations.
- Right to Restrict Processing: You may request that we limit the processing of your personal data in certain circumstances.
- Right to Data Portability: You may request to receive a copy of your personal data in a structured, commonly used, and machine-readable format and, where technically feasible, have it transmitted to another controller.
- Right to Object: You may object to processing of your personal data for direct marketing purposes, including profiling.
- Rights related to Automated Decision-Making and Profiling: You may request human intervention if we make decisions based solely on automated processing, including profiling, which significantly affects you.

You also have the right to lodge a complaint with your local data protection authority if you believe your data rights have been violated.

For purposes of EU data protection law, the data controller is:

Ponder Technologies Inc.

275 South Street, 10F, New York, NY 10002

privacy@ponder.ai

To exercise any of these rights, please contact us as indicated below.

Using Ponder for Client Work

When your footage includes your clients or other people, you decide what goes into Ponder and we process it on your instructions. For EU and UK data protection purposes, you are the controller of that content and Ponder is your processor. We sign a Data Processing Addendum on request; email privacy@ponder.ai.

How We Protect Your Personal Data

We encrypt Customer Content in transit and at rest, restrict access to authorized personnel with a business need, and keep each customer's projects separate from other customers. We use commercially reasonable administrative, physical, and technical measures designed to protect your personal data from accidental loss or destruction and from unauthorized access, use, alteration, and disclosure. If a security incident affects your Customer Content, we will notify you without undue delay. However, no website, mobile application, system, electronic storage, or online service is completely secure, and we cannot guarantee the security of your personal data transmitted to, through, using, or in connection with the Services. In particular, email, texts, and chats sent to or from the Services may not be secure, and you should carefully decide what information you send to us via such communications channels. Any transmission of personal data is at your own risk.

Please keep your sign-in details private, and tell us at privacy@ponder.ai if you think someone has accessed your account without permission.

How We Retain Your Personal Data

We keep Customer Content while your project or account exists. When you delete a project or your account, we remove its Customer Content, including backup copies, within 30 days. During that time you can ask us to restore it.

Agent conversation logs, which we use to fix problems with the agent, are deleted after 90 days.

We keep billing and tax records, and records we need for security and fraud prevention, for as long as the law requires or allows.

We keep other personal data only as long as reasonably necessary for the purposes in this policy. After that, we delete, destroy, or de-identify it.

Changes to Our Privacy Policy

We may update this policy from time to time, and we will provide notice of any such changes to the policy as required by law. The date the privacy policy was last updated is identified at the top of the page. We will notify you of changes to this policy by updating the "last updated" date and posting the updated policy on the Services. We may email or otherwise communicate reminders about this policy, but you should check our Services periodically to see the current policy and any changes we have made to it. If we change how we handle Customer Content in a way that gives us more rights to it, we will email you at least 30 days before the change takes effect.

Contact Information

To exercise your rights or ask questions or comment about this privacy policy or our privacy practices, contact us:

By email: privacy@ponder.ai

By mail: 275 South Street, 10F, New York, NY 10002