

Privacy Policy

Effective Starting: October 1, 2024

Zeafarer, Inc, a Delaware Corporation (“Company” or “We”), respects your privacy and is committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when you visit the website located at zeafarer.io, or use services such as our guest portal located at passenger.zeafarer.io, or our API, and our practices for collecting, using, maintaining, protecting and disclosing that information. This policy applies to information we collect through our Websites, Web Portals, and APIs (collectively known as our Services). This policy also applies to any information we collect in email, text, and other electronic messages between you and our Services.

This policy also explains your choices surrounding how we use information about you, which include how you can object to certain uses of information about you and how you can access and update certain information about you. **If you do not agree with this policy, do not access or use our Services or interact with any other aspect of our business.**

Where we provide the Services under contract with an organization (for example, your employee), that organization controls the information processed by the Services.

What information we collect about you

We collect information about you when you use our Services, visit our websites, and interact with us in a business context. Information may be collected when you provide it to us directly, or automatically when you use the Services and websites. We may also collect data from other sources, including those that are publicly available or from third-party data providers.

Account and Profile Information: We collect information about you when you register for an account, create or modify your profile, or set preferences. For example, you provide your contact information and, in some cases, billing information, when you register for the Services. You also have the option of adding other details to your profile information to be displayed in our Services. We keep track of your preferences when you select settings within the Services.

Content you provide through our products: The Services include the Zeafarer products you use, where we collect and store content that you post, send, receive and share. This content includes any information about you that you may choose to include. Examples of content we collect and store include: The trips you are going on or working, log entries and task notes that you complete, and comments that you leave for other users. Content also includes the files and links you upload to the services.

Content you provide through our websites: The Services also include our websites owned or operated by us. We collect other content that you submit to these websites, which include social media or social networking websites operated by us. For example, you provide content to us

when you provide feedback or when you participate in any interactive features, surveys, contests, promotions, activities or events.

Information you provide through our support channels: The Services also include our customer support, where you may choose to submit information regarding a problem you are experiencing with a Service. Whether you designate yourself as a technical contact, open a support ticket, speak to one of our representatives directly or otherwise engage with our support team, you will be asked to provide contact information, a summary of the problem you are experiencing, and any other documentation, screenshots, or information that would be helpful in resolving the issue.

Payment Information: We collect payment and billing information when you register for certain paid Services. For example, we ask you to designate a billing representative, including name and contact information, upon registration.

Information we collect automatically when you use the Services

We collect information about you when you use our Services, including browsing our websites and taking certain actions within the Services.

Your use of the Services: We keep track of certain information about you when you visit and interact with any of our Services. This information includes the features you use; the links you click on; the type, size and filenames of attachments you upload to the Services; search terms; and how you interact with others on the services. We also collect information about the people you travel with, the crews you work with and how you work with them, like who you collaborate with and communicate with most frequently.

Device and Connection Information: We collect information about your computer, phone, tablet, or other devices you use to access the Services. This device information includes your connection type and settings when you install, access, update, or use our Services. We also collect information through your device about your operating system, browser type, IP address, URLs of referring/exit pages, device identifiers, and crash data. We use your IP address and/or country preference in order to approximate your location to provide you with a better Service experience. How much of this information we collect depends on the type and settings of the device you use to access the Services.

Cookies and Other Tracking Technologies: Seafarer and our third-party partners, such as our advertising and analytics partners, use cookies and other tracking technologies (e.g., web beacons, device identifiers and pixels) to provide functionality and to recognize you across different Services and devices.

Information we receive from other sources

We receive information about you from other Service users, from third-party services, social media platforms, public databases, and from our business and channel partners. We may combine this information with information we collect through other means described above. This

helps us to update and improve our records, identify new customers, create more personalized advertising, and suggest services that may be of interest to you.

Other users of the Services: Other users of our Services may provide information about you when they submit content through the Services. For example, you may be mentioned in a task or logbook entry opened by someone else. We also receive your email address from other Service users when they provide it in order to invite you to the Services. Similarly, an administrator may provide your contact information when they designate you as the billing or technical contact on your company's account or when they designate you as an administrator.

How we use information we collect

We use information that we collect about you or that you provide to us, including any personal information to present our Services and their content to you; to personalize your experience with our Services; for research and development to improve our services; to provide you with information, products, or services that you request from us; to resolve technical issues you encounter and requests for assistance; to verify accounts and activity, to detect, prevent and respond to potential or actual security incidents and to monitor and protect against other malicious, deceptive, fraudulent, or illegal activity, including violations of Service policies; to fulfill any other purpose for which you provide it; to carry out our obligations and enforce our rights arising from any contracts entered into between you and us including for billing and collection; to notify you about changes to our services we offer or provide; and for any other purpose with your consent.

Disclosure of Your Information

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

We may disclose personal information that we collect or you provide as described in this privacy policy to contractors, service providers, and other third parties we use to support our business; 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 Zeafarer, Inc's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding in which personal information held by Zeafarer about our users is among the assets transferred; with your consent. We may also disclose your personal information 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 [link] 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 Zeafarer, Inc, our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection or credit risk reduction.

How we store and secure information we collect

We use industry standard technical and organizational measures to secure the information we store. While we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the internet, we cannot guarantee that

information during transmission through the internet or while stored on our systems or otherwise in our care, is absolutely safe from intrusion by others.

How long we keep information

How long we keep information we collect about you depends on the type of information. After such time, we will either delete or de-identify your information or, if this is not possible, then we will securely store your information and isolate it from any further use until deletion is possible.

We retain your account information for as long as your account is active and a reasonable period thereafter in case you decide to reactivate the Services. We also retain some of your information as necessary to comply with our legal obligations, to resolve disputes, to enforce our agreements, to support business operations, and to continue to develop and improve our Services. Where we retain information for Service improvement and development, we take steps to eliminate information that directly identifies you, and we only use the information to uncover collective insights about the use of our Services, not to specifically analyze personal characteristics about you.

If your account is deactivated or disabled, some of your information and the content you have provided will remain in order to allow your crew or other users to make full use of the Services. For example, we continue to display messages you sent to the users that received them and continue to display content you provided, but when requested details that can identify you will be removed. If the Services are made available to you through an organization (e.g. your employer), we retain your information as long as required by the administrator of your account.

If you have elected to receive marketing emails from us, we retain information about your marketing preferences for a reasonable period of time from the date you last expressed interest in our Services, such as when you last opened an email from us or ceased using your Zeafarer account. We retain information derived from cookies and other tracking technologies for a reasonable time from the date such information was created.

Your Privacy rights and choices

Depending on the data protection laws that apply to you, you may have the right to access and obtain a copy of your information; request correction of inaccurate information; request deletion of your information; request that we transfer your information to a third party in a machine-readable format; object to our processing of your information, withdraw your consent, or ask us to restrict the processing of your information; opt out of certain disclosures of your information to third parties, including for targeted advertising purposes. You also have the right not to be discriminated against for exercising any of these rights. If you would like to exercise any of your rights, such as access, correction, or deletion of your information, you may follow the steps below. We will handle your request within thirty (30) days unless it is unusually extensive or complex, in which case we will advise you of the expected timeline for handling your request. We may also ask for additional information to confirm your identity.

When using our Services, you may access, update, or correct most of your Account information by logging into your account to edit your profile or organizational records. If you have requests that cannot be carried out through the use of the Services, such as accessing additional information or deleting information about you, please email privacy@zeafarer.com. Please note that we may need to retain certain information about you for as long as you maintain an account for our Services, to provide you with our Services, for record keeping purposes, for payment processing, to comply with our legal and regulatory obligations, to resolve disputes, or to enforce the applicable Terms of Service or other agreement in place between you and Zeafarer.

Regional Privacy Notice

Zeafarer may act as a data controller when we are collecting information from you to set up and administer your Zeafarer account; monitoring usage information on our websites; managing your contact and other related information to send marketing, sales, Services, and other communications to you; and responding to a support or general inquiry.

The legal basis for processing information about you include your consent which may be withdrawn at any time; necessity to perform a contract; legitimate interest such as to maintain and improve the Services, the security of those services, and the attracting of new customers to the Services; and circumstances where we may have a legal obligation to process your personal data to comply with relevant laws or where processing is necessary to protect your vital interests or those of another person.

Where you are using our Services and making decision about the personal data that is being processed in the Services, you are acting as a data controller and Zeafarer is acting as a data processor. We rely on you to comply with applicable privacy laws when collecting, using, or disclosing information about individuals through the Services, including obtaining any necessary consents and providing any necessary notices.

There are certain obligations under the GDPR and other data protection laws that you have as a data controller, including being responsible for managing Content on the Services. As a data processor, Zeafarer will only access and process Content to provide you with the Services in accordance with your instructions, the Terms of Service, and applicable laws. As part of delivering the Services, we may process Content to further improve the Services, such as enhancing usability and developing new features.

California Privacy Rights

If you are a consumer as defined by the California Consumer Privacy Act ("CCPA"), this section applies to you and supplements our Privacy Policy.

The categories and specific types of personal information collected and sources from which personal information are collected are set out above. The business and commercial purposes for collecting personal information are set out above. The categories of third parties with whom your information is set out above.

We have outlined certain rights in the section “Your Privacy rights and choices”

Under the CCPA, you have the following rights: the right to know about the personal information collected about you, which we have set out under “What information we collect about you” and “How we use information we collect”; the right to have your personal information deleted; the right to correct inaccurate personal information; the right not to be discriminated against for exercising consumer rights under the CCPA; the right to opt-out of the “sale” or “sharing” of your personal information.

You may access, update, or correct most of your account information by logging into your account; or you may exercise your rights by emailing privacy@zeafarer.com. While we share or disclose personal information with third parties or service providers for the purpose of providing the Services, managing our relationship with you, and for personalized advertising purposes, we do not “sell” your personal information in the traditional sense. However, the definitions of “sale” and “sharing” under the CCPA may include the disclosure of your information to our advertising and marketing partners. You may opt out of the “sale” or “sharing of your personal information for advertising purposes by clicking the Cookie Preferences link accessible from the Cookie Notice or at the footer of one of our main website pages and making your selection. If you require additional assistance to opt out of sharing, please email privacy@zeafarer.com. We do not knowingly “sell” or “share” the personal information of individuals under 16 years of age.

Our policy towards children

Zeafarer is committed to the protection of children’s online privacy. The Children’s Online Privacy Protection Act (“COPPA”) governs information gathered online from or about children under the age of 13. Verifiable consent from a child’s parent or guardian is required before collecting, using, or disclosing personal information from a child under age 13. If Zeafarer intends to collect information about children under 13 years old, COPPA-required information and instructions will be provided by the specific web page that collects information about the child. The web page will specify exactly what the information will be used for, who will see it, and how long it will be kept.

Changes to this Privacy Policy

We may make changes to this Privacy Policy at any time to reflect updates to our Services, applicable laws, and other factors. We will include a prominent notice on this website and/or our Services if we make any material changes, but we encourage you to stay informed by reviewing this page periodically.

How to contact us

If you have any questions, concerns or feedback, please email privacy@zeafarer.com or send a letter to:

Zeafarer, Inc.
1916 10th St NW
Washington, DC, 20001