

# PRIVACY POLICY

MISIXS, LLC

Version 1.1 - Approved by GRC

Effective Date: January 2, 2026

## 1. Overview

This Privacy Policy explains how MISIXS, LLC ("MISIXS," "we," "us," or "our") collects, uses, discloses, and safeguards Personal Information in connection with the RuleFirst platform and related services (collectively, the "Platform" or "Services").

MISIXS, LLC is an Ohio limited liability company that operates under one or more brand names and doing business as ("DBA") names, including the RuleFirst platform. All references to "we," "us," or "our" refer to MISIXS, LLC and its current and future brands, products, and services.

This Privacy Policy applies to information we collect:

- Through the Platform and Services
- In email, text, and other electronic communications
- Through customer support interactions
- From third-party service providers and data sources

**Please read this Privacy Policy carefully.** By accessing or using the Platform, you acknowledge that you have read, understood, and agree to be bound by this Privacy Policy and our Terms of Service.

## 2. Relationship to Data Processing Agreement

MISIXS, LLC processes Personal Data in two distinct capacities:

### 2.1 As a Data Controller

We act as a data controller when we collect and process Personal Information about our customers, users, website visitors, and business contacts for our own business purposes. This Privacy Policy governs such processing.

### 2.2 As a Data Processor

We act as a data processor (or service provider) when we process Personal Data on behalf of our customers in connection with their use of the Platform. Such processing is governed by our **Data Processing Agreement** (available at <https://trust.misixs.com>).

**In the event of any conflict between this Privacy Policy and the Data Processing Agreement with respect to Customer Personal Data processed on behalf of customers, the Data Processing Agreement controls.**

## 3. Information We Collect

We collect several categories of Personal Information to operate the Platform and provide our Services.

### 3.1 Information You Provide Directly

**Account and Registration Information:**

- Name, email address, phone number
- Company name and business information
- Username and password
- Job title and role
- Communication preferences

**Billing and Payment Information:**

- Payment card details (processed by third-party payment processors)
- Billing address and contact information
- Transaction history and wallet balance
- Tax identification numbers (where required)

**Communications and Support:**

- Messages, inquiries, and support requests
- Feedback, survey responses, and testimonials
- Email and SMS communications
- Call recordings (where permitted by law and with notice)

**Content and Data You Upload:**

- Customer data, contact lists, and databases
- Workflow configurations and automation rules
- Templates, documents, and files
- Custom integrations and API configurations

### 3.2 Information Collected Automatically

**Usage and Analytics Data:**

- IP address, device identifiers, and browser type
- Pages viewed, features used, and time spent
- Click patterns, navigation paths, and session data
- Performance metrics and error logs
- Referral sources and campaign identifiers

**Cookies and Similar Technologies:**

- Session cookies and authentication tokens
- Analytics and performance cookies
- Preference and settings cookies
- Advertising and marketing cookies (with consent where required)

For more information about cookies, see Section 12 below.

### 3.3 Information from Third-Party Sources

**Business Intelligence and Enrichment:**

- Publicly available business information
- Contact verification and validation data
- Company size, industry, and demographic data

**Integration Partners:**

- Data from third-party services you connect to the Platform
- Social media profile information (where authorized)
- CRM, marketing, and sales platform data

**Payment Processors:**

- Transaction confirmation and payment status
- Fraud detection and risk assessment data

## 4. How We Use Information

We use Personal Information for the following purposes:

### 4.1 Platform Operation and Service Delivery

- Provide, operate, and maintain the Platform
- Process transactions and manage subscriptions
- Authenticate users and maintain account security
- Deliver customer support and respond to inquiries
- Send transactional communications and service updates
- Enable features such as automation, AI, and integrations

### 4.2 Business Operations and Analytics

- Analyze usage patterns and improve the Platform
- Conduct research and development
- Monitor performance, uptime, and reliability
- Detect, prevent, and address technical issues
- Generate aggregated and anonymized analytics

### 4.3 Marketing and Communications

- Send promotional emails and product updates (with consent or legitimate interest)
- Deliver targeted advertising and personalized content
- Conduct surveys and request feedback
- Manage affiliate and referral programs
- Promote events, webinars, and educational content

You may opt out of marketing communications at any time using the unsubscribe link in emails or by contacting [privacy@misixs.com](mailto:privacy@misixs.com).

### 4.4 Legal and Compliance

- Comply with legal obligations and regulatory requirements
- Enforce our Terms of Service and other agreements
- Protect our rights, property, and safety
- Respond to legal process and government requests
- Prevent fraud, abuse, and security incidents

### 4.5 Artificial Intelligence and Machine Learning

The Platform uses artificial intelligence, machine learning, and automation technologies to provide certain features, including:

- AI-powered workflow automation
- Natural language processing and text generation
- Predictive analytics and recommendations
- Image generation and content creation
- Voice AI and conversational interfaces

**Important:** We do not use Customer Personal Data (data you upload or process through the Platform on behalf of your customers) to train public foundation models or proprietary AI models owned or

controlled by MISIXS, LLC unless expressly agreed in writing. Where public model APIs are used, we leverage zero retention or no training configurations where available.

AI processing of Customer Personal Data is governed by our Data Processing Agreement.

## 5. Data Retention

We retain Personal Information 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.

### 5.1 Retention Periods

#### **Account and Profile Data:**

- Duration of the customer relationship plus seven (7) years after account closure
- Required for legal compliance, dispute resolution, and business records

#### **Customer Personal Data (Processed on Behalf of Customers):**

- Retained in accordance with customer instructions and our Data Processing Agreement
- Deleted or returned upon termination of Services unless retention is required by law

#### **Marketing and Communications Data:**

- Retained until you opt out or withdraw consent
- Suppression lists maintained indefinitely to honor opt-out requests

#### **Billing and Transaction Records:**

- Seven (7) years from the date of the transaction
- Required for tax, accounting, and regulatory compliance

#### **Support Communications:**

- Three (3) years from the date of the last interaction
- May be retained longer if related to ongoing disputes or investigations

#### **Usage and Analytics Data:**

- Aggregated and anonymized data may be retained indefinitely
- Identifiable usage data retained for up to two (2) years

### 5.2 Deletion and Anonymization

Upon expiration of the applicable retention period, we will delete or anonymize Personal Information in accordance with our data retention policies and applicable law. You may request earlier deletion by contacting [privacy@misixs.com](mailto:privacy@misixs.com), subject to our legal and contractual obligations.

## 6. Security Measures

We implement reasonable administrative, technical, and organizational safeguards designed to protect Personal Information against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access.

### 6.1 Technical Safeguards

- Encryption of data in transit using TLS/SSL protocols
- Encryption of sensitive data at rest
- Secure authentication and access controls
- Regular security testing and vulnerability assessments
- Intrusion detection and monitoring systems

### 6.2 Organizational Safeguards

- Employee training on data protection and security
- Confidentiality agreements with employees and contractors
- Access controls based on role and need-to-know principles
- Incident response and breach notification procedures
- Regular review and update of security policies

### 6.3 Limitations

**No system is perfectly secure.** While we strive to protect your Personal Information, we cannot guarantee absolute security. You are responsible for maintaining the confidentiality of your account credentials and for any activity under your account.

If you become aware of any unauthorized access or security incident, please notify us immediately at [privacy@misixs.com](mailto:privacy@misixs.com).

## 7. Sharing of Information

We share Personal Information only as described in this Privacy Policy and in accordance with applicable law.

### 7.1 Service Providers and Subprocessors

We engage third-party service providers and subprocessors to support the Platform, including:

- Cloud infrastructure and hosting providers
- Payment processors and billing services
- Email, SMS, and communications platforms
- Analytics and performance monitoring tools
- Artificial intelligence and machine learning APIs
- Customer support and ticketing systems
- Marketing and advertising platforms

All service providers are subject to contractual data protection obligations consistent with this Privacy Policy and our Data Processing Agreement. A list of material subprocessors is available in our Data Processing Agreement or upon request.

### 7.2 Affiliates and Business Transfers

We may share Personal Information with current or future affiliates, subsidiaries, or related entities for business purposes consistent with this Privacy Policy.

In the event of a merger, acquisition, reorganization, sale of assets, or bankruptcy, Personal Information may be transferred to a successor entity. We will provide notice and, where required by law, obtain consent before transferring Personal Information subject to a materially different privacy policy.

### 7.3 Legal and Regulatory Authorities

We may disclose Personal Information when required by law or when we believe in good faith that disclosure is necessary to:

- Comply with legal process, court orders, or government requests
- Enforce our Terms of Service or other agreements
- Protect our rights, property, or safety, or that of our users or the public
- Detect, prevent, or address fraud, security, or technical issues
- Respond to claims of illegal activity or violations of third-party rights

## 7.4 With Your Consent

We may share Personal Information for purposes not described in this Privacy Policy with your express consent or at your direction.

## 7.5 No Sale of Personal Information

**We do not sell Personal Information.** We do not share Personal Information with third parties for their direct marketing purposes without your consent.

For purposes of the California Consumer Privacy Act (CCPA) and similar state privacy laws, we do not "sell" or "share" Personal Information as those terms are defined under such laws.

## 8. International Transfers

MISIXS, LLC is based in the United States, and Personal Information is processed primarily in the United States. If you access the Platform from outside the United States, your Personal Information may be transferred to, stored in, and processed in the United States or other countries where our service providers operate.

### 8.1 Transfers from the European Economic Area (EEA), United Kingdom, and Switzerland

If you are located in the EEA, United Kingdom, or Switzerland, we transfer Personal Data outside of those jurisdictions only in accordance with applicable law and with appropriate safeguards, including:

- Standard Contractual Clauses approved by the European Commission
- Adequacy decisions by the European Commission
- Other lawful transfer mechanisms recognized under the GDPR

For more information about international data transfers, including copies of applicable safeguards, please contact [privacy@misixs.com](mailto:privacy@misixs.com).

### 8.2 Data Processing Agreement

International transfers of Customer Personal Data processed on behalf of customers are governed by our Data Processing Agreement, which includes Standard Contractual Clauses and other appropriate safeguards.

## 9. Your Privacy Rights

Depending on your location and applicable law, you may have certain rights regarding your Personal Information.

### 9.1 General Privacy Rights

**Right to Access:** You may request confirmation of whether we process your Personal Information and obtain a copy of such information.

**Right to Correction:** You may request that we correct inaccurate or incomplete Personal Information.

**Right to Deletion:** You may request that we delete your Personal Information, subject to certain exceptions (e.g., legal obligations, dispute resolution, fraud prevention).

**Right to Portability:** You may request a copy of your Personal Information in a structured, commonly used, and machine-readable format.

**Right to Restriction:** You may request that we restrict processing of your Personal Information in certain circumstances.

**Right to Object:** You may object to processing of your Personal Information based on legitimate interests or for direct marketing purposes.

**Right to Withdraw Consent:** Where processing is based on consent, you may withdraw consent at any time without affecting the lawfulness of processing based on consent before withdrawal.

## 9.2 How to Exercise Your Rights

To exercise any of these rights, please submit a request to:

**Email:** [privacy@misixs.com](mailto:privacy@misixs.com) **Subject Line:** Privacy Rights Request **Mail:** MISIXS, LLC, 970 Nolder Drive, Lancaster, Ohio 43130

We will respond to your request within **thirty (30) to forty-five (45) days** of receipt, depending on the complexity of the request and applicable law. We may require verification of your identity before processing your request.

## 9.3 Authorized Agents

You may designate an authorized agent to submit requests on your behalf. We may require proof of authorization and verification of your identity before processing requests submitted by authorized agents.

## 9.4 Appeals

If we deny your request, you may appeal the decision by contacting [privacy@misixs.com](mailto:privacy@misixs.com) with "Privacy Rights Appeal" in the subject line. We will respond to appeals within a reasonable timeframe as required by applicable law.

## 10. U.S. State Privacy Rights

Residents of certain U.S. states have additional privacy rights under state law.

### 10.1 California Residents (CCPA/CPRA)

If you are a California resident, you have the following rights under the California Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA):

**Right to Know:** You may request disclosure of the categories and specific pieces of Personal Information we have collected, the sources from which it was collected, the purposes for collection, and the categories of third parties with whom we share it.

**Right to Delete:** You may request deletion of your Personal Information, subject to certain exceptions.

**Right to Correct:** You may request correction of inaccurate Personal Information.

**Right to Opt Out:** You have the right to opt out of the "sale" or "sharing" of Personal Information. **We do not sell or share Personal Information.**

**Right to Limit Use of Sensitive Personal Information:** You may request that we limit use of sensitive Personal Information to purposes permitted by law. We do not use sensitive Personal Information for purposes requiring opt-out rights.

**Right to Non-Discrimination:** We will not discriminate against you for exercising your privacy rights.

**Shine the Light:** California residents may request information about disclosure of Personal Information to third parties for direct marketing purposes. We do not share Personal Information with third parties for their direct marketing purposes.

### 10.2 Colorado, Connecticut, Utah, and Virginia Residents

If you are a resident of Colorado, Connecticut, Utah, or Virginia, you have rights similar to those described above, including rights to access, correct, delete, and obtain a copy of your Personal Information, and to opt out of targeted advertising and sales (which we do not engage in).

### 10.3 Other State Residents

Additional states may enact privacy laws providing similar rights. We will update this Privacy Policy and honor applicable rights as required by law.

### 10.4 Exercising State Privacy Rights

To exercise your state privacy rights, please contact [privacy@misixs.com](mailto:privacy@misixs.com) with "State Privacy Rights Request" in the subject line. We will respond within the timeframe required by applicable state law (typically 45 days, with a possible extension).

## 11. Children's Privacy

The Platform is not intended for use by individuals under the age of eighteen (18). We do not knowingly collect Personal Information from children under 18.

If we become aware that we have collected Personal Information from a child under 18 without parental consent, we will take steps to delete such information as soon as reasonably practicable.

If you believe we have collected information from a child under 18, please contact [privacy@misixs.com](mailto:privacy@misixs.com) immediately.

## 12. Cookies and Tracking Technologies

We use cookies, web beacons, pixels, and similar tracking technologies to collect information about your use of the Platform and to provide certain features and functionality.

### 12.1 Types of Cookies We Use

**Strictly Necessary Cookies:** Required for the Platform to function properly. These cookies enable core functionality such as authentication, security, and session management. They cannot be disabled.

**Performance and Analytics Cookies:** Collect information about how you use the Platform, including pages visited, features used, and errors encountered. This helps us improve the Platform.

**Functional Cookies:** Remember your preferences and settings to provide a personalized experience.

**Marketing and Advertising Cookies:** Used to deliver relevant advertising and measure the effectiveness of marketing campaigns. These cookies may track your activity across websites.

### 12.2 Third-Party Cookies

We use third-party analytics and advertising services that may set cookies on your device, including:

- Google Analytics
- Facebook Pixel
- LinkedIn Insight Tag
- Other marketing and analytics platforms

These third parties may collect information about your online activities over time and across different websites.

### 12.3 Managing Cookies

You can control cookies through your browser settings. Most browsers allow you to:

- View and delete cookies
- Block third-party cookies
- Block all cookies (may affect Platform functionality)
- Receive notifications when cookies are set

You may also opt out of interest-based advertising by visiting:

- Digital Advertising Alliance: [www.aboutads.info/choices](http://www.aboutads.info/choices)
- Network Advertising Initiative: [www.networkadvertising.org/choices](http://www.networkadvertising.org/choices)
- Your Online Choices (EU): [www.youronlinechoices.eu](http://www.youronlinechoices.eu)

**Note:** Disabling cookies may affect your ability to use certain features of the Platform.

## 12.4 Do Not Track Signals

Some browsers support "Do Not Track" (DNT) signals. We do not currently respond to DNT signals, as there is no industry standard for how to interpret and respond to such signals.

## 13. Third-Party Links and Services

The Platform may contain links to third-party websites, applications, or services that are not owned or controlled by MISIXS, LLC. This Privacy Policy does not apply to third-party websites or services.

We are not responsible for the privacy practices of third parties. We encourage you to review the privacy policies of any third-party websites or services you visit or use.

## 14. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, the Platform, or applicable law.

### 14.1 Notice of Changes

We will notify you of material changes by:

- Posting the updated Privacy Policy on the Platform with a new "Last Updated" date
- Sending an email notification to the address associated with your account
- Displaying a prominent notice on the Platform

For material changes that affect processing of Customer Personal Data governed by the Data Processing Agreement, we will provide at least **thirty (30) days' advance notice** as required by the DPA.

### 14.2 Acceptance of Changes

Your continued use of the Platform after the effective date of the updated Privacy Policy constitutes acceptance of the changes. If you do not agree to the updated Privacy Policy, you must stop using the Platform and may request deletion of your account by contacting [privacy@misixs.com](mailto:privacy@misixs.com).

## 15. Contact Information

If you have questions, concerns, or requests regarding this Privacy Policy or our privacy practices, please contact us:

**MISIXS, LLC** 970 Nolder Drive Lancaster, Ohio 43130 United States

**Privacy Inquiries and Rights Requests:** [privacy@misixs.com](mailto:privacy@misixs.com)

**General Support:** [privacy@misixs.com](mailto:privacy@misixs.com)

**Data Protection Officer (where required):** [privacy@misixs.com](mailto:privacy@misixs.com)

**Web Resources:** Privacy Policy: <https://trust.misixs.com>

Terms of Service: <https://trust.misixs.com>

Data Processing Agreement: <https://trust.misixs.com>

Cookie Policy: <https://trust.misixs.com>

## 16. Additional Information for EEA, UK, and Swiss Residents

If you are located in the European Economic Area (EEA), United Kingdom, or Switzerland, the following additional information applies:

### 16.1 Legal Basis for Processing

We process Personal Data on the following legal bases:

**Contract Performance:** Processing necessary to provide the Services and fulfill our contractual obligations.

**Legitimate Interests:** Processing necessary for our legitimate business interests, including:

- Operating and improving the Platform
- Marketing and business development
- Fraud prevention and security
- Analytics and research

**Legal Obligation:** Processing necessary to comply with legal and regulatory requirements.

**Consent:** Processing based on your explicit consent, which you may withdraw at any time.

### 16.2 Data Controller

For Personal Information we collect and process as a data controller, MISIXS, LLC is the data controller.

For Customer Personal Data processed on behalf of customers, the customer is the data controller and MISIXS, LLC is the data processor.

### 16.3 Supervisory Authority

You have the right to lodge a complaint with a supervisory authority in your country of residence, place of work, or place of alleged infringement if you believe our processing of your Personal Data violates applicable law.

### 16.4 Data Protection Officer

For data protection inquiries, please contact [privacy@misixs.com](mailto:privacy@misixs.com).

## 17. Version History

Version	Status	Log	Date
1.1	Current	Initial policy version for MISIXS, LLC	January 2, 2026

**END OF PRIVACY POLICY**