

PRIVACY POLICY

Effective Date: January 1, 2026

Last Updated: January 1, 2026

1. INTRODUCTION

This Privacy Policy (“**Policy**”) describes how **Source Technologies, Inc.** (“**Source**,” “**Company**,” “**we**,” “**us**,” or “**our**”) collects, uses, processes, stores, discloses, and protects personal information in connection with the **OptiRF™ platform** (“**OptiRF**” or the “**Platform**”).

OptiRF is an artificial intelligence-driven platform designed to facilitate request-for-information (RFI), request-for-proposal (RFP), vendor discovery, and intelligent matching between organizations and service providers.

This Policy applies to all users, including:

- Buyers submitting requirements (“Buy-Side Users”)
 - Service providers responding to opportunities (“Sell-Side Users”)
 - Website visitors and prospective customers
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2. DATA CONTROLLER AND PROCESSOR ROLES

Depending on the context of data processing:

- **Source acts as a Data Controller** for:
 - Account registration data
 - Platform usage data
 - Marketing and analytics
- **Source acts as a Data Processor** for:
 - Customer-submitted RFIs/RFPs
 - Provider-submitted proposals
 - Data processed on behalf of enterprise clients

Where Source acts as a processor, processing is governed by applicable agreements, including Data Processing Addenda (DPA) where applicable.

3. CATEGORIES OF INFORMATION COLLECTED

3.1 Personal and Business Information

We collect:

- Name, email address, phone number
 - Company name, role, and organizational data
 - Professional credentials and experience
 - Billing and transaction data (if applicable)
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3.2 Platform Content and Submissions

- RFIs, RFPs, and project requirements
 - Vendor profiles and capabilities
 - Proposals, pricing, and responses
 - Messages, communications, and uploaded documents
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3.3 Automatically Collected Data

- IP address and device identifiers
 - Browser type and operating system
 - Usage patterns and interaction data
 - Session logs and timestamps
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3.4 AI-Generated and Derived Data

We generate:

- Matching scores and rankings
- Behavioral insights and engagement metrics
- Predictive analytics and recommendations
- Aggregated benchmarking data

This data may be considered personal data where it relates to identifiable individuals.

3.5 Third-Party Data Sources

We may collect or enrich data from:

- Public business databases
 - Professional platforms (where authorized)
 - Data enrichment and analytics providers
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4. PURPOSES OF PROCESSING

We process data for the following purposes:

4.1 Platform Functionality

- Provide, operate, and maintain OptiRF
 - Match buyers and providers
 - Enable communication between users
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4.2 AI Model Development

- Train and improve machine learning models
 - Enhance recommendation accuracy
 - Develop new capabilities
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4.3 Analytics and Product Improvement

- Monitor platform performance
 - Analyze usage trends
 - Generate aggregated insights
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4.4 Communications

- Send transactional communications
 - Provide updates and notifications
 - Deliver marketing communications (where permitted)
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4.5 Security and Compliance

- Detect fraud and abuse
 - Enforce policies and agreements
 - Comply with legal obligations
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5. LEGAL BASES FOR PROCESSING (GDPR)

Where applicable, we rely on:

- Contractual necessity
 - Legitimate interests
 - Consent
 - Legal obligations
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6. DATA SHARING AND DISCLOSURE

6.1 Platform Sharing

- Buyer data may be shared with matched providers
 - Provider data may be shared with buyers
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6.2 Service Providers

We engage third parties for:

- Cloud hosting (e.g., AWS)
- Analytics (e.g., Mixpanel)
- Communication infrastructure

All vendors are contractually obligated to protect data.

6.3 Business Transfers

Data may be transferred in connection with:

- Mergers or acquisitions
- Investment or financing transactions

6.4 Legal Disclosure

We may disclose data:

- To comply with legal obligations
- To respond to lawful requests
- To protect rights and safety

7. DATA RETENTION

We retain personal data:

- As long as necessary for service delivery
- For legitimate business purposes
- To comply with legal requirements

Retention periods are based on:

- Data type
- Contractual obligations
- Regulatory requirements

8. DATA SECURITY

We implement industry-standard safeguards, including:

- Encryption in transit and at rest (where applicable)
- Role-based access controls
- Monitoring and logging systems
- Secure cloud infrastructure

No system is completely secure, but we continuously improve our controls.

9. INTERNATIONAL DATA TRANSFERS

Data may be processed in the United States and other jurisdictions.

Where required, we implement safeguards such as:

- Standard Contractual Clauses (SCCs)
 - Data transfer agreements
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10. YOUR RIGHTS

Depending on your jurisdiction, you may have the right to:

- Access personal data
- Correct inaccuracies
- Request deletion
- Restrict or object to processing
- Data portability
- Withdraw consent

Requests can be submitted to:

privacy@source-technologies.com

11. CALIFORNIA PRIVACY RIGHTS (CCPA/CPRA)

California residents have the right to:

- Know what personal information is collected
- Request deletion
- Opt out of sale or sharing

We do not sell personal data in the traditional sense.

12. COOKIES AND TRACKING TECHNOLOGIES

We use cookies and similar technologies to:

- Enable functionality
- Analyze usage
- Improve performance

Users can manage cookies via browser settings.

13. AI AND AUTOMATED DECISION-MAKING

OptiRF uses AI systems to:

- Analyze requirements
- Recommend providers
- Generate scoring and insights

These systems:

- Do not replace human decision-making
- May involve profiling under applicable law
- Are continuously monitored and refined

14. DATA OWNERSHIP AND USAGE RIGHTS

- Buyers retain ownership of submitted requirements
- Providers retain ownership of proposals
- Source retains rights to:
 - Aggregated data
 - Anonymized insights
 - AI model improvements

15. CHILDREN'S PRIVACY

The Platform is not intended for individuals under 18.
We do not knowingly collect personal data from children.

16. CHANGES TO THIS POLICY

We may update this Policy at any time.
Changes will be posted with an updated "Last Updated" date.

17. CONTACT INFORMATION

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