

## Privacy Policy

Effective date: 5-May-2026

At Valency, we take your privacy seriously. Please read this Privacy Policy to learn how we treat your personal data. **By using or accessing our Services in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that we will collect, use and share your information as described in this Privacy Policy.**

Remember that your use of Valency's Services is at all times subject to our Terms of Use (<https://valency.io/terms>), which incorporates this Privacy Policy. Any terms we use in this Policy without defining them have the definitions given to them in the Terms of Use.

You may print a copy of this Privacy Policy by clicking here <https://valency.io/privacy/privacy.pdf>.

As we continually work to improve our Services, we may need to change this Privacy Policy from time to time. Upon such changes, we will alert you to material changes by placing a notice on the Valency website, by sending you an email and/or by some other means. Please note that if you've opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes.

### Privacy Policy Table of Contents

#### What this Privacy Policy Covers

##### Personal Data

- *Categories of Personal Data We Collect*
- *Our Commercial or Business Purposes for Collecting or Disclosing Personal Data*
- *Other Permitted Purposes for Processing Personal Data*
- *Categories of Sources of Personal Data*

##### How We Disclose Your Personal Data

##### Tracking Tools, Advertising and Opt-Out

##### Data Security

##### Personal Data of Children

##### U.S. State Privacy Rights

##### Exercising Your Rights under U.S. State Privacy Laws

##### European Union, United Kingdom, and Swiss Data Subject Rights

##### Contact Information

### What this Privacy Policy Covers

This Privacy Policy covers how we treat Personal Data that we gather when you access or use our Services. "Personal Data" means any information that identifies or relates to a particular individual and also includes information referred to as "personally identifiable information" or "personal information" or "sensitive personal information" under applicable data privacy laws, rules or regulations. This Privacy Policy does not cover the practices of companies we don't own or control or people we don't manage.

## Personal Data

### Categories of Personal Data We Collect

This chart details the categories of Personal Data that we collect and have collected over the past 12 months:

<b>Category of Personal Data (and Examples)</b>	<b>Business or Commercial Purpose(s) for Collection</b>	<b>Categories of Third Parties With Whom We Disclose this Personal Data</b>
<b>Profile or Contact Data</b> such as first and last name, email and unique identifiers such as ORCID.	<ul style="list-style-type: none"><li>• Providing, Customizing and Improving the Services</li><li>• Corresponding with You</li></ul>	<ul style="list-style-type: none"><li>• Service Providers</li></ul>
<b>Payment Data</b> such as financial account information, payment card type, last 4 digits of payment card, and billing address, phone number, and email.	<ul style="list-style-type: none"><li>• Providing, Customizing and Improving the Services</li><li>• Corresponding with You</li></ul>	<ul style="list-style-type: none"><li>• Service Providers (specifically our payment processing partner, currently Stripe, Inc.)</li></ul>
<b>Web Analytics</b> such as statistics associated with the interaction between device or browser and the Services.	<ul style="list-style-type: none"><li>• Providing, Customizing and Improving the Services</li><li>• Corresponding with You</li></ul>	<ul style="list-style-type: none"><li>• Service Providers</li></ul>
<b>Professional or Employment-Related Data</b> such as ORCID.	<ul style="list-style-type: none"><li>• Providing, Customizing and Improving the Services</li></ul>	<ul style="list-style-type: none"><li>• Service Providers</li></ul>
<b>Geolocation Data</b> such as IP-address-based location information.	<ul style="list-style-type: none"><li>• Providing, Customizing and Improving the Services</li></ul>	<ul style="list-style-type: none"><li>• Service Providers</li></ul>

### Our Commercial or Business Purposes for Collecting Personal Data

- **Providing, Customizing and Improving the Services**
  - Creating and managing your account or other user profiles.
  - Processing orders or other transactions; billing.
  - Providing support and assistance for the Services.
  - Improving the Services, including testing, research, internal analytics and product development.
  - Receiving feedback on the Services (including bug reports or satisfaction scores).
- **Corresponding with You**
  - Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about Valency or the Services.

### Other Permitted Purposes for Processing Personal Data

In addition, each of the above referenced categories of Personal Data may be collected, used, and disclosed with the government, including law enforcement, or other parties to meet certain legal requirements and enforcing legal terms including: fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities; protecting the rights, property or

safety of you, Valency or another party; enforcing any agreements with you; responding to claims that any posting or other content violates third-party rights; and resolving disputes. We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated or incompatible purposes without providing you notice or obtaining your consent.

### Categories of Sources of Personal Data

We collect Personal Data about you from the following categories of sources:

- **You**
  - When you provide such information directly to us.
    - When you create an account or use our interactive tools and Services.
    - When you voluntarily provide information in free-form text boxes through the Services or through responses to surveys or questionnaires.
    - When you send us an email or otherwise contact us.
  - When you use the Services and such information is collected automatically.
    - Through Cookies (defined in the “Tracking Tools, Advertising and Opt-Out” section below).
    - When you provide information through an AI assistant or other programmatic interface.

### How We Disclose Your Personal Data

We disclose your Personal Data to the categories of service providers and other parties listed in this section. Depending on state laws that may be applicable to you, some of these disclosures may constitute a “sale” of your Personal Data. For more information, please refer to the state-specific sections below.

- **Service Providers.** These parties help us provide the Services or perform business functions on our behalf. They include:
  - Hosting, technology and communication providers.
  - Analytics providers for web traffic or usage of our Services.
  - Security and fraud prevention consultants.
  - Support and customer service vendors.
  - Product fulfillment and delivery providers.
  - Payment processors.
    - Our payment processing partner Stripe, Inc. (“Stripe”) collects your voluntarily-provided payment card information necessary to process your payment.
    - Please see Stripe’s terms of service and privacy policy for information on its use and storage of your Personal Data.
- **Parties You Authorize, Access or Authenticate**
  - Third parties you access through the services.

### Legal Obligations

We may disclose any Personal Data that we collect with third parties in conjunction with any of the activities set forth under “Other Permitted Purposes for Processing Personal Data” section above.

### Business Transfers

All of your Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part).

### Data that is Not Personal Data

We may create aggregated, de-identified or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified or anonymized data and disclose it with third parties for our lawful business purposes, including to analyze, build and improve the Services and promote our business, provided that we will not attempt to reidentify the data and/or disclose such data in a manner that could identify you.

### Tracking Tools, Advertising, and Opt-Out

The Services use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “Cookies”) to enable our servers to recognize your web browser, tell us how and when you visit and use our Services, analyze trends, learn about our user base and operate and improve our Services. Cookies are small pieces of data– usually text files – placed on your computer, tablet, phone or similar device when you use that device to access our Services. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s).

Please note that because of our use of Cookies, the Services do not support “Do Not Track” requests sent from a browser at this time.

We use the following types of Cookies:

- Essential Cookies. Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Services. Disabling these Cookies may make certain features and services unavailable.
- Performance/Analytical Cookies. Performance/Analytical Cookies allow us to understand how visitors use our Services. They do this by collecting information about the number of visitors to the Services, what pages visitors view on our Services and how long visitors are viewing pages on the Services. Performance/Analytical Cookies also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and the Services’ content for those who engage with our advertising. For example, Google LLC (“Google”) uses cookies in connection with its Google Analytics services. Google’s ability to use and disclose information collected by Google Analytics about your visits to the Services is subject to the Google Analytics Terms of Use and the Google Privacy Policy. You have the option to opt-out of Google’s use of Cookies by visiting the Google advertising opt-out page at [www.google.com/privacy\\_ads.html](http://www.google.com/privacy_ads.html) or the Google Analytics Opt-out Browser Add-on at <https://tools.google.com/dlpage/gaoptout/>.

You can decide whether or not to accept Cookies through your internet browser’s settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software)

allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our website and some of the Services and functionalities may not work.

To find out more information about Cookies generally, including information about how to manage and delete Cookies, please visit <http://www.allaboutcookies.org/> or <https://ico.org.uk/for-the-public/online/cookies/> if you are located in the European Union.

### **Data Security**

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures based on the type of Personal Data and how we are processing that data. You should also help protect your data by appropriately selecting and protecting your password and/or other sign-on mechanism; limiting access to your computer or device and browser; and signing off after you have finished accessing your account. Although we work to protect the security of your account and other data that we hold in our records, please be aware that no method of transmitting data over the internet or storing data is completely secure.

### **Data Retention**

We retain Personal Data about you for as long as necessary to provide you with our Services or to perform our business or commercial purposes for collecting your Personal Data. When establishing a retention period for specific categories of data, we consider who we collected the data from, our need for the Personal Data, why we collected the Personal Data, and the sensitivity of the Personal Data. In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. We may further retain information in an anonymous or aggregated form where that information would not identify you personally.

For example:

- We retain your profile information and credentials for as long as you have an account with us.
- Web and tool usage analytics.

### **Personal Data of Children**

As noted in the Terms of Use, we do not knowingly collect or solicit Personal Data from children under 16 years of age; if you are a child under the age of 16, please do not attempt to register for or otherwise use the Services or send us any Personal Data. If we learn we have collected Personal Data from a child under 16 years of age, we will delete that information as quickly as possible. If you believe that a child under 16 years of age may have provided Personal Data to us, please contact us at [support@valency.io](mailto:support@valency.io).

### **U.S. State Privacy Rights**

If you reside in certain U.S. states such as California, Colorado, Connecticut, Delaware, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Tennessee, Texas, Utah, and Virginia you may have certain rights afforded to you (as described below) depending on your state of residence. Please see the 'Exercising Your Rights under U.S. State Privacy Laws' section below for instructions regarding how to exercise these rights. Please note that we may process Personal Data of our customers' end users or employees in connection with our provision of certain services for our customers. If we are processing your Personal Data as a service provider, you should contact the entity that collected your Personal Data in the first instance to address your rights with respect to such data. Please note that your rights may be subject to certain conditions or exceptions in accordance with applicable U.S. State Privacy Laws.

If you have any questions about this section or whether any of the following rights apply to you, please contact us at support@valency.io.

- Access: You may have the right to request confirmation of or access to the Personal Data that we process about you. You can also request access to a portable copy of your Personal Data. If you are a Minnesota or Oregon resident, you also have the right to request a list of specific third parties, other than natural persons, to whom we have disclosed your Personal Data (subject to exceptions in accordance with applicable law).
- Deletion: You may have the right to request that we delete the Personal Data that we have collected about you.
- Correction: You may have the right to request that we correct any inaccurate Personal Data we have collected about you.
- Portability: You may have the right to request a copy of your Personal Data in a machine-readable format, to the extent technically feasible.

#### "Selling," "Sharing," or "Targeted Advertising"

Depending on your state of residence, you may have the right to opt out from the "sale," "share," or disclosure of your Personal Data for the purposes of targeted advertising. These or similar terms may be defined differently depending the applicable U.S. State Privacy Law.

You have the right to opt-out of the sale or share of your Personal Data by following the instructions in the "Exercising Your Rights under U.S. State Privacy Laws" section. Once you have submitted an opt-out request, we will not ask you to reauthorize the sale of your Personal Data for at least 12 months.

We do not sell, share, or process your Personal Data for the purposes of targeted advertising, and have not done so over the last 12 months.

#### Automated Decision Making and Profiling

Depending on the state of your residence, you may have the right to opt-out the use of automated decision making technology or from the processing of your Personal Data for the purposes of profiling in furtherance of decisions that produce legal or similarly significant effects to you, if applicable. However, we do not process your Personal Data in this manner.

#### Anti-Discrimination

We will not discriminate against you for exercising your rights under applicable privacy laws. We will not deny you our goods or services, charge you different prices or rates, or provide you a lower

quality of goods and services if you exercise your rights under applicable privacy laws. However, we may offer different tiers of our Services as allowed by applicable data privacy laws with varying prices, rates or levels of quality of the goods or services you receive related to the value of Personal Data that we receive from you.

#### Other State-Specific Privacy Rights

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Data to third parties for such third parties' direct marketing purposes; in order to submit such a request, please contact us at support@valency.io.

Your browser may offer you a "Do Not Track" option, which allows you to signal to operators of websites and web applications and services that you do not wish such operators to track certain of your online activities over time and across different websites. Our Services do not support Do Not Track requests at this time. To find out more about "Do Not Track," you can visit [www.allaboutdnt.com](http://www.allaboutdnt.com).

Please note that we do not currently sell your Personal Data as sales are defined in Nevada Revised Statutes Chapter 603A.

#### **Exercising Your Rights under U.S. State Privacy Laws**

To exercise the rights described in this Privacy Policy, you or your Authorized Agent (if applicable and as defined below), must send us a request that (1) provides sufficient information to allow us to verify that you are the person about whom we have collected Personal Data (such as your Contact or Profile Data), and (2) describes your request in sufficient detail to allow us to understand, evaluate and respond to it. Each request that meets both of these criteria will be considered a "Valid Request." We may not respond to requests that do not meet these criteria. We will only use Personal Data provided in a Valid Request to verify your identity and complete your request. You do not need an account to submit a Valid Request.

We will work to respond to your Valid Request within the time period required by applicable privacy laws. We will not charge you a fee for making a Valid Request unless your Valid Request(s) is excessive, repetitive or manifestly unfounded. If we determine that your Valid Request warrants a fee, we will notify you of the fee and explain that decision before completing your request.

#### Request to Access, Delete, Correct

As applicable, you may submit a Valid Request for your right to access, delete, correct, or obtain a copy of your Personal Data described in this Privacy Policy by using the following methods:

- Email us at: support@valency.io
- Submit a form at this address: 2168 Shattuck Ave., Suite 300, Berkeley, CA 94704-1373

If you are a California, Colorado, Connecticut, Delaware, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey Oregon, Rhode Island, or Texas resident, you may also authorize an agent (an "Authorized Agent") to exercise your rights on your behalf. To do this, you must provide your Authorized Agent with written permission to exercise your rights on your behalf, and we may request a copy of this written permission from your Authorized Agent when they make a request on your behalf.

### Appealing a Denial

If you are a Colorado, Connecticut, Delaware, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, or Virginia resident and we refuse to take action on your request within a reasonable period of time after receiving your request in accordance with this section, you may appeal our decision. In such appeal, you must (1) provide sufficient information to allow us to verify that you are the person about whom the original request pertains and to identify the original request, and (2) provide a description of the basis of your appeal. Please note that your appeal will be subject to your rights and obligations afforded to you under the U.S. State Privacy Laws (as applicable). We will respond to your appeal within the time period required under the applicable law. You can submit a Verified Request to appeal by the following methods:

- Email us at: support@valency.io (title must include “[STATE OF RESIDENCE] Appeal”)
- Mail request to: 2168 Shattuck Ave., Suite 300, Berkeley, CA 94704-1373

If we deny your appeal, you have the right to contact the Attorney General of your State, including by the following links: [Colorado](#), [Connecticut](#), [Delaware](#), [Indiana](#), [Iowa](#), [Kentucky](#), [Maryland](#), [Minnesota](#), [Montana](#), [Nebraska](#), [New Hampshire](#), [New Jersey](#), [Oregon](#), [Tennessee](#), [Texas](#), and [Virginia](#).

### **European Union and United Kingdom Data Subject Rights**

#### European Union and United Kingdom Residents

If you are a resident of the European Union (“EU”), United Kingdom (“UK”), Liechtenstein, Norway or Iceland, you may have additional rights under the EU or UK General Data Protection Regulation (the “GDPR”) with respect to your Personal Data, as outlined below.

For this section, we use the terms “Personal Data” and “processing” as they are defined in the GDPR, but “Personal Data” generally means information that can be used to individually identify a person, and “processing” generally covers actions that can be performed in connection with data such as collection, use, storage and disclosure. Valency will be the controller of your Personal Data processed in connection with the Services.

If there are any conflicts between this section and any other provision of this Privacy Policy, the policy or portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following applies to you, please contact us at support@valency.io. Note that we may also process Personal Data of our customers’ end users or employees in connection with our provision of certain services to customers, in which case we are the processor of Personal Data. If we are the processor of your Personal Data (i.e., not the controller), please contact the controller party in the first instance to address your rights with respect to such data.

#### Personal Data We Collect

The “Categories of Personal Data We Collect” section above details the Personal Data that we collect from you.

### Personal Data Use and Processing Grounds

The “Our Commercial or Business Purposes for Collecting Personal Data” section above explains how we use your Personal Data.

We will only process your Personal Data if we have a lawful basis for doing so. Lawful bases for processing include consent, contractual necessity and our “legitimate interests” or the legitimate interest of others, as further described below.

- Contractual Necessity: We process the following categories of Personal Data as a matter of “contractual necessity”, meaning that we need to process the data to perform under our Terms of Use with you, which enables us to provide you with the Services. When we process data due to contractual necessity, failure to provide such Personal Data will result in your inability to use some or all portions of the Services that require such data.
  - Profile or Contact Data, such as first and last name, email address, username, and ORCID.
- Legitimate Interest: We process the following categories of Personal Data when we believe it furthers the legitimate interest of us or third parties:
  - Profile or Contact Data, such as first and last name, email address, username, and ORCID.
  - Web Analytics, such as statistics associated with the interaction between device or browser and the Services.
  - We may also de-identify or anonymize Personal Data to further our legitimate interests.

Examples of these legitimate interests include (as described in more detail above):

- Providing, customizing and improving the Services.
  - Corresponding with you.
  - Meeting legal requirements and enforcing legal terms.
  - Completing corporate transactions.
- Consent: In some cases, we process Personal Data based on the consent you expressly grant to us at the time we collect such data. When we process Personal Data based on your consent, it will be expressly indicated to you at the point and time of collection.
  - Other Processing Grounds: From time to time we may also need to process Personal Data to comply with a legal obligation, if it is necessary to protect the vital interests of you or other data subjects, or if it is necessary for a task carried out in the public interest.

### Disclosing Personal Data

The “How We Disclose Your Personal Data” section above details how we disclose your Personal Data with third parties.

### EU, UK and Swiss Data Subject Rights

You have certain rights with respect to your Personal Data, including those set forth below. For more information about these rights, or to submit a request, please email us at support@valency.io. Please note that in some circumstances, we may not be able to fully comply with your request, such as if it is frivolous or extremely impractical, if it jeopardizes the rights of others, or if it is not

required by law, but in those circumstances, we will still respond to notify you of such a decision. In some cases, we may also need you to provide us with additional information, which may include Personal Data, if necessary to verify your identity and the nature of your request.

- **Access:** You can request more information about the Personal Data we hold about you and request a copy of such Personal Data.
- **Rectification:** If you believe that any Personal Data we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data.
- **Erasure:** You can request that we erase some or all of your Personal Data from our systems.
- **Withdrawal of Consent:** If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the use or disclosure of certain of your Personal Data, if such use or disclosure is necessary to enable you to utilize some or all of our Services.
- **Portability:** You can ask for a copy of your Personal Data in a machine-readable format. You can also request that we transmit the data to another controller where technically feasible.
- **Objection:** You can contact us to let us know that you object to the further use or disclosure of your Personal Data for certain purposes, such as for direct marketing purposes.
- **Restriction of Processing:** You can ask us to restrict further processing of your Personal Data.
- **Right to File Complaint:** You have the right to lodge a complaint about Valency's practices with respect to your Personal Data with the supervisory authority of your country or EU Member State. A list of Supervisory Authorities is available here: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).
- **Right to object to automated decision-making and profiling:** Individuals can object to decisions made solely by automated means without human involvement, including by profiling. As we do not conduct automated decision-making or profiling, we do not offer a way to exercise this right.

### Transfers of Personal Data

The Services are hosted and operated in the United States ("U.S.") through Valency and its service providers, and if you do not reside in the U.S., laws in the U.S. may differ from the laws where you reside. By using the Services, you acknowledge that any Personal Data about you, regardless of whether provided by you or obtained from a third party, is being provided to Valency in the U.S. and will be hosted on U.S. servers, and you authorize Valency to transfer, store and process your information to and in the U.S., and possibly other countries. In some circumstances, your Personal Data may be transferred to a subprocessor in the U.S. pursuant to a data processing agreement incorporating standard data protection clauses.

### **Contact Information:**

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Data or your choices and rights regarding such collection and use, please do not hesitate to contact us at:

- [support@valency.io](mailto:support@valency.io)

- 2168 Shattuck Ave., Suite 300, Berkeley, CA, USA 94704-1373

If you are located in the EU or UK, you may use the following information to contact our EU or UK-Based Member Representative:

EU Representative: (prospective)  
Data Protection Representative Limited (DataRep Ireland)  
77 Camden Street Lower, Dublin, D02 XE80, Ireland.  
[contact@datarep.com](mailto:contact@datarep.com)

UK Representative: (prospective)  
Data Protection Representative Limited (DataRep UK)  
85 Great Portland Street, London, W1W 7LT, United Kingdom  
[contact@datarep.com](mailto:contact@datarep.com)