

Geocodio Privacy Statement

Last Updated: October 9, 2026

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1. Introduction

Geocodio is a registered doing-business-as name of Dotsquare LLC, a Virginia limited liability company ("Geocodio," "we," "us," or "our").

We understand that you are aware of and care about your own personal privacy interests, and we take that seriously. This Privacy Statement describes Geocodio's policies and practices regarding its collection and use of your personal data, and sets forth your privacy rights. We recognize that information privacy is an ongoing responsibility, and so we will from time to time

update this Privacy Statement as we undertake new personal data practices or adopt new privacy policies.

A summary version of this Privacy Statement is also available at <https://www.geocod.io/gdpr>.

2. Signed Agreements and Order of Precedence

If you have a signed agreement with Geocodio that covers data privacy or data processing — for example, an Enterprise Software-as-a-Service Agreement, a Data Processing Agreement, a UK Data Services Attachment, or a Business Associate Agreement — that agreement supersedes this Privacy Statement with respect to the matters it addresses. This Privacy Statement continues to apply to anything not covered by the signed agreement. Any conflicts between this Privacy Statement and a signed agreement are resolved in favor of the signed agreement.

Certain privacy laws, including the EU General Data Protection Regulation, the UK General Data Protection Regulation, and the U.S. Health Insurance Portability and Accountability Act, require a signed data processing agreement, business associate agreement, or equivalent instrument before a controller may transmit covered data to a processor. We make these agreements available to qualifying customers as described in this Privacy Statement and on <https://www.geocod.io/gdpr>. If you transmit data subject to any such framework to Geocodio without first executing the required agreement with us, you remain solely responsible for that processing, and Geocodio bears no liability for it. You are responsible for ensuring that all required agreements are in place before transmitting covered data.

3. Data Protection Officer

Geocodio is headquartered in Norfolk, Virginia, in the United States. Geocodio has appointed an internal Data Protection Officer for you to contact if you have any questions or concerns about Geocodio's personal data policies or practices. If you would like to exercise your privacy rights, please direct your query to Geocodio's Data Protection Officer.

The Data Protection Officer is available for inquiries from European Union, United Kingdom, Canadian, Australian, and New Zealand data subjects, as well as data subjects in any jurisdiction whose privacy laws apply to Geocodio's processing of personal data.

Data Protection Officer contact information:

4. Privacy Laws and Frameworks We Comply With

Geocodio is committed to complying with all applicable privacy and data protection laws in the jurisdictions where we operate and where our customers and their data subjects reside. These include, without limitation:

European Union

- General Data Protection Regulation (GDPR), Regulation (EU) 2016/679 — Effective May 25, 2018

United Kingdom

- UK General Data Protection Regulation (UK GDPR) — The retained EU GDPR as it forms part of UK law following Brexit
- Data Protection Act 2018 (DPA 2018) — UK legislation supplementing UK GDPR
- Privacy and Electronic Communications Regulations (PECR) — UK rules governing electronic marketing communications and cookies

Canada

- Canada's Anti-Spam Legislation (CASL) — Effective July 1, 2014
- Personal Information Protection Act of Alberta (PIPA Alberta) — Effective January 1, 2004
- Personal Information Protection Act of British Columbia (PIPA BC) — Effective January 1, 2004
- Personal Information Protection and Electronic Documents Act (PIPEDA) — Effective January 1, 2001
- Quebec Law 25 (Act to modernize legislative provisions as regards the protection of personal information) — Fully effective September 22, 2024

United States — Federal

- Health Insurance Portability and Accountability Act (HIPAA) of 1996 and the Health Information Technology for Economic and Clinical Health Act (HITECH) of 2009 — Enterprise-only
- Children's Online Privacy Protection Act (COPPA) — Amended rule effective June 23, 2025; compliance required by April 22, 2026
- Family Educational Rights and Privacy Act (FERPA) — Available under NDPA

United States — State Comprehensive Privacy Laws

- Alabama Personal Data Protection Act (APDPA) — Effective May 1, 2027
- California Consumer Privacy Act (CCPA) — Effective January 1, 2020
- California Privacy Rights Act (CPRA) — Effective January 1, 2023
- Colorado Privacy Act (CPA) — Effective July 1, 2023
- Connecticut Data Protection Act (CTDPA) — Effective July 1, 2023
- Delaware Personal Data Privacy Act (DPDPA) — Effective January 1, 2025
- Florida Digital Bill of Rights — Effective July 1, 2024 (applies only to controllers with more than \$1 billion in annual global gross revenue; Geocodio does not meet this threshold, so this law does not currently apply to Geocodio)
- Indiana Consumer Data Protection Act — Effective January 1, 2026
- Iowa Consumer Data Protection Act (ICDPA) — Effective January 1, 2025
- Kentucky Consumer Data Protection Act (KCDPA) — Effective January 1, 2026
- Louisiana Data Privacy Act — Effective January 1, 2027
- Maryland Online Data Privacy Act (MODPA) — Effective October 1, 2025
- Minnesota Consumer Data Privacy Act (MCDPA) — Effective July 31, 2025
- Montana Consumer Data Privacy Act — Effective October 1, 2024
- Nebraska Data Privacy Act — Effective January 1, 2025
- New Hampshire Privacy Act (NHPA) — Effective January 1, 2025
- New Jersey Data Privacy Act (NJDPa) — Effective January 15, 2025
- Oklahoma Personal Data Protection Act — Effective January 1, 2027
- Oregon Consumer Privacy Act (OCPA) — Effective July 1, 2024
- Rhode Island Data Transparency and Privacy Protection Act — Effective January 1, 2026
- Tennessee Information Protection Act (TIPA) — Effective July 1, 2025
- Texas Data Privacy and Security Act (TDPSA) — Effective July 1, 2024
- Utah Consumer Privacy Act (UCPA) — Effective December 31, 2023
- Vermont Data Privacy and Online Surveillance Act — Effective January 1, 2028
- Virginia Consumer Data Protection Act (VCDPA) — Effective January 1, 2023

Australia

- Privacy Act 1988 (Cth), including the Australian Privacy Principles (APPs) — Australian federal privacy law
- Spam Act 2003 (Cth) — Australian rules governing commercial electronic messages

New Zealand

- Privacy Act 2020, including the Information Privacy Principles (IPPs) — New Zealand privacy law
- Unsolicited Electronic Messages Act 2007 — New Zealand rules governing commercial electronic messages

This Privacy Statement is intended to apply to all applicable privacy laws. Where a specific provision of an applicable law conflicts with this Privacy Statement, the more protective provision governs.

5. How We Collect and Use Your Personal Information

Geocodio collects personal information about its website visitors and customers. This information may include:

- Name
- Employer name
- Work address
- Work email address
- Work phone number
- Account credentials and authentication data
- Payment information (processed by our payment service provider; we do not see or store full payment card numbers)
- Service usage data (API calls, file uploads, feature usage)
- Internet protocol (IP) address (collected when you use our website and service, including for security and approximate location)
- Country of residence

We use this information to provide our services, manage your account, process payments, deliver customer support, communicate with you about our services, and meet our legal obligations.

We do not sell personal information to anyone. We share personal information with third parties only as described in Section 9, which includes service providers who facilitate the delivery of our services and, for email addresses, the advertising on LinkedIn described in that Section, which involves only our users' email addresses and no other personal information.

Geocodio collects personal information directly from you, automatically from your use of our website and service, and from the data you upload to our service. We do not receive personal information about you from other third parties.

We do not use your personal information for psychographic profiling or automated decision-making that produces legal or similarly significant effects.

We do not use personal information — whether account information or data you upload to our service — to train large language models or other artificial intelligence models.

6. Use of the Geocodio Website

As is true of most other websites, Geocodio's website collects certain information automatically and stores it in log files. The information may include internet protocol (IP) addresses, the region or general location where your computer or device is accessing the internet, browser type, operating system, and other usage information about the use of the Geocodio website, including a history of the pages you view.

We use this information to help us design our site to better suit our users' needs. We may also use your IP address to help diagnose problems with our server and to administer our website, analyze trends, track visitor movements, and gather broad demographic information that assists us in identifying visitor preferences.

Geocodio has a legitimate interest in understanding how customers and potential customers use its website. This assists Geocodio with providing more relevant products and services and with providing appropriate staffing to meet customer needs.

Product Analytics

We use product analytics on our website and documentation to understand which pages are visited and how our content is used, so that we can improve our content and our product. We collect the pages you view, the page that referred you, and device and browser information. For visitors who are not signed in, this activity is tracked in anonymized form. When you are signed in to your Geocodio account, we record the website and documentation pages you visit together with your account; this tracking is not anonymous.

If you are in the European Union or the United Kingdom, we use cookies or similar technologies for product analytics that are not strictly necessary only with your consent, where required by law. You can change your choice at any time through the cookie notice on our website.

7. Cookies and Tracking Technologies

We use cookies on our website to signal your logged-in status, provide core website functionality, remember your privacy preferences, and track website behavior for service improvement. For visitors who are not signed in, this tracking is anonymized. For signed-in users, we record the website and documentation pages they visit together with their account, as described in Section 6.

We do not use cookies for cross-site tracking, behavioral profiling for commercial purposes, sharing data with advertising networks, or creating detailed user profiles for marketing. Product analytics, described in Section 6, is used to improve our content and product and not to build advertising profiles. The email-based advertising on LinkedIn described in Section 9 does not use cookies on our website.

You can control cookie settings through your browser preferences. We recognize Global Privacy Control (GPC) signals as valid opt-out requests for the sale and sharing of personal information where required by law, including for signed-in users.

8. Use of Geocodio Services

When you use Geocodio's services to process addresses, geographic coordinates, or other location data, the data you submit is processed in accordance with the retention periods described in Section 16, our Data Retention Policy (available at <https://www.geocod.io/data-retention-policy>) and, where applicable, any signed Data Processing Agreement or other agreement between you and Geocodio.

For data processing on behalf of customers, Geocodio acts as a data processor or service provider, and the customer is responsible for ensuring it has the proper legal basis and rights to transmit personal data to Geocodio for processing. The customer is also responsible for ensuring it has the necessary agreements in place (such as a Data Processing Agreement) when applicable law requires them.

9. When and How We Share Information with Third Parties

The personal information Geocodio collects from you is stored in one or more databases hosted by third parties located in the United States and the European Economic Area. These third parties do not use or have access to your personal information for any purpose other than cloud storage, retrieval, and the specific operational purposes for which they were engaged.

On occasion, Geocodio engages third parties to send information to you, including information about our products, services, and events.

We do not otherwise reveal your personal data to non-Geocodio persons or businesses for their independent use unless:

(1) you request or authorize it;

(2) the information is provided to comply with the law (for example, compelled by law enforcement to comply with a search warrant, subpoena, or court order), enforce an agreement we have with you, or to protect our rights, property, or safety, or the rights, property, or safety of our employees or others;

(3) the information is provided to our agents, vendors, or service providers who perform functions on our behalf;

(4) to address emergencies or acts of God; or

(5) to address disputes, claims, or to persons demonstrating legal authority to act on your behalf.

We may also gather aggregated data about our services and website visitors and disclose the results of such aggregated (but not personally identifiable) information to our partners, service providers, advertisers, and other third parties for marketing or promotional purposes.

Advertising on LinkedIn

The only data we share with LinkedIn is our users' email addresses (which may be hashed). We do not share any other personal information with LinkedIn, and we never share any data you upload to or process through our service. We may share the email addresses associated with user accounts with LinkedIn, hashed where applicable, so that LinkedIn can match them to LinkedIn members and show those members Geocodio advertisements on LinkedIn, and so that we can measure the performance of our advertisements. LinkedIn is the recipient of this information and may process it in the United States and other countries. This does not include contact or prospect records or any other data. We do not provide this information to LinkedIn for any purpose other than showing and measuring Geocodio's own advertisements.

If you are in the European Union or the United Kingdom, our legal basis for this processing is our legitimate interests in marketing our services to business users.

You may opt out at any time by emailing privacy@geocodio.io, and we will stop using your email address for this purpose and remove it from our advertising audiences. You may also change your advertising settings in your LinkedIn account. See also Section 12.

We do not sell personal information. Other than sharing our users' email addresses with LinkedIn as described above, we do not share personal information with third parties for targeted advertising. California law may treat sharing email addresses with LinkedIn for advertising as "sharing" personal information for cross-context behavioral advertising; see the California Residents section of Section 13 for your rights.

10. Sub-processors and Service Providers

A current list of Geocodio's sub-processors and other service providers is maintained at <https://www.geocod.io/gdpr>. This list is the canonical sub-processor list referenced in Geocodio's Data Processing Agreement and any UK Data Processing Agreement. Any addition or replacement of a sub-processor will be reflected on that page.

For customers with a signed Data Processing Agreement, the procedures for notification of sub-processor changes and the right to object to such changes are governed by the terms of that signed agreement.

11. International Data Transfers

Geocodio has its headquarters in the United States. Information we collect about you may be processed in the United States, the European Economic Area, the United Kingdom, or other jurisdictions.

By using Geocodio's services, you acknowledge that your personal information may be processed in jurisdictions outside your country of residence. Where personal information is transferred across borders, Geocodio relies on the following safeguards:

European Economic Area Users

For data subjects in the European Economic Area, Geocodio relies on adequacy decisions of the European Commission where applicable, Standard Contractual Clauses adopted by the European Commission (Commission Implementing Decision (EU) 2021/914), or other lawful transfer mechanisms approved under the EU GDPR.

United Kingdom Users

For data subjects in the United Kingdom, Geocodio relies on UK adequacy regulations where applicable, the UK International Data Transfer Agreement (IDTA), the UK Addendum to the EU Standard Contractual Clauses, or other lawful transfer mechanisms approved under the UK GDPR. Where data is transferred to the United States, Geocodio relies on the UK Extension to the EU-U.S. Data Privacy Framework where applicable.

Canadian Users

For data subjects in Canada, Geocodio complies with the accountability principle of the Personal Information Protection and Electronic Documents Act (PIPEDA) when transferring

personal information across borders. Geocodio remains responsible for the protection of Canadian personal information transferred to third parties for processing. For Quebec residents, Geocodio conducts privacy impact assessments for cross-border transfers as required by Quebec Law 25 and ensures that personal information receives equivalent protection in the destination jurisdiction.

Australian Users

Geocodio does not store or process personal information in Australia. Personal information of Australian individuals is likely to be disclosed to overseas recipients, including in the United States and Germany (European Union), and in other countries where our service providers, such as Intercom, Stripe, Bento, and LinkedIn, operate. The only information we share with LinkedIn is our users' email addresses. Before disclosing personal information to an overseas recipient, Geocodio takes reasonable steps, including contractual protections, to ensure that the recipient handles the information consistently with the Australian Privacy Principles (APP 8).

New Zealand Users

Where Geocodio discloses the personal information of New Zealand individuals to a recipient outside New Zealand, Geocodio takes steps to ensure that the information is subject to safeguards comparable to those in the Privacy Act 2020, including by contract with the recipient (Information Privacy Principle 12).

Geocodio also enters into data processing agreements and contractual data protection clauses with its vendors whenever feasible and appropriate.

12. Data Subject Rights

Depending on your jurisdiction of residence, you may have the following rights regarding your personal information. Geocodio will respond to verified requests within the timeframes required by applicable law.

Universal Rights (Available to All Users)

- **Right to Know** — Request information about what personal data we collect, use, and share
- **Right to Access** — Request a copy of the personal data we hold about you
- **Right to Delete** — Request deletion of your personal data, subject to legal exceptions
- **Right to Correct** — Request correction of inaccurate personal information
- **Right to Opt-Out of Sales and Sharing** — We do not sell personal information; we confirm this applies to you. Sharing of users' email addresses with LinkedIn for advertising is addressed under Right to Opt-Out of Targeted Advertising below

- **Right to Opt-Out of Targeted Advertising** — Right to opt out of targeted advertising, including the use of your email address, as a user, for advertising on LinkedIn (see Section 9 and the California Residents section of Section 13); your email address is the only information we share with LinkedIn for this purpose. To opt out, email privacy@geocod.io or change your advertising settings in your LinkedIn account. We also honor Global Privacy Control signals as an opt-out of sharing
- **Right to Non-Discrimination** — We will not deny services or charge different prices for exercising your rights

How to Exercise Your Rights

- **Delete your account:** via the Geocodio dashboard at <https://dash.geocod.io/account>
- **Delete spreadsheet data:** via the Geocodio dashboard at <https://dash.geocod.io/import>
- **Other requests:** Email privacy@geocod.io with your specific request
- **Response time:** We respond to requests within the timeframes required by applicable law (typically 15 to 45 days in the United States; one month under EU GDPR, UK GDPR, and Canadian law, with possible extensions for complex requests; within 30 days in Australia; within 20 working days in New Zealand)
- **Verification:** We may ask for additional information to verify your identity before processing your request

Authorized Agents

You may designate an authorized agent to make requests on your behalf. Agents must provide written authorization signed by you, verify their own identity, and (for deletion requests) provide a power of attorney where required by applicable law.

Appeal Process

If we deny your privacy request, you may appeal by emailing privacy@geocod.io within 30 days of the denial. We will review and respond within 15 days. If you remain unsatisfied, you may contact the regulatory authority identified in Section 20.

13. Jurisdiction-Specific Rights

European Union Residents (GDPR)

If you are in the European Union, you have the following rights under the GDPR:

- Right to be informed
- Right of access
- Right to rectification

- Right to erasure ("right to be forgotten")
- Right to restrict processing
- Right of data portability
- Right to object to processing, including direct marketing
- Right to withdraw consent at any time, where processing is based on consent
- Rights related to automated decision-making and profiling — Geocodio does not use your personal data for automated decision-making that produces legal or similarly significant effects
- Right to lodge a complaint with your national data protection authority

United Kingdom Residents (UK GDPR and Data Protection Act 2018)

If you are in the United Kingdom, you have the following rights under UK GDPR and the Data Protection Act 2018:

- Right of access to your personal data
- Right to rectification of inaccurate personal data
- Right to erasure ("right to be forgotten")
- Right to restrict processing
- Right to data portability
- Right to object to processing, including direct marketing
- Rights related to automated decision-making and profiling
- Right to withdraw consent at any time, where processing is based on consent
- Right to lodge a complaint with the Information Commissioner's Office (ICO)

Canadian Residents (PIPEDA, Quebec Law 25, PIPA Alberta, PIPA BC)

If you are in Canada, you have the following rights under the applicable federal and provincial privacy laws:

- Right of access to your personal information
- Right to correction of inaccurate or incomplete personal information
- Right to withdraw consent to the collection, use, or disclosure of your personal information
- Right to know how your personal information is being used and disclosed
- Right to challenge compliance with the applicable privacy law

If you are a Quebec resident, you additionally have the following rights under Quebec Law 25:

- Right to data portability — receive your personal information in a structured, commonly used technological format
- Right to be informed of automated decision-making that produces legal or similarly significant effects, and to request the reasoning behind it
- Right to deindexation ("right to be forgotten") in certain circumstances

- Right to be informed of cross-border transfers of your personal information and the privacy impact assessment conducted

Tracking technologies on our website that can identify, locate, or profile users are subject to the cookie consent on our website, and are not activated without your consent. Quebec users can refuse or withdraw consent at any time through the cookie preferences.

United States Residents

If you are a resident of a U.S. state with a comprehensive privacy law in effect, you have the rights granted by that law. These vary by state and may include:

- Right to know what personal information is collected
- Right to delete personal information
- Right to correct inaccurate personal information
- Right to data portability (in certain states)
- Right to opt out of the sale or sharing of personal information
- Right to opt out of targeted advertising
- Right to opt out of profiling for automated decision-making (in certain states)
- Right to limit use of sensitive personal information (in certain states)

For state-specific rights and procedures, see <https://www.geocod.io/gdpr>.

California Residents (CCPA/CPRA)

If you are a California resident, the California Consumer Privacy Act, as amended by the California Privacy Rights Act (CCPA/CPRA), gives you the rights described in Section 12, including the rights to know, delete, correct, and opt out of the sale or sharing of your personal information, and the right to non-discrimination. This section describes the personal information we have collected in the preceding 12 months.

The categories of personal information we collect are:

- **Identifiers:** name, email address, IP address, and account ID
- **Professional or employment-related information:** employer name, work address, and work phone number
- **Commercial information:** purchase, payment, and invoice records
- **Internet or other electronic network activity:** pages you view on our website and documentation (linked to your account when you are signed in) and your use of our service
- **Approximate location:** region or country derived from your IP address; we do not collect precise geolocation
- **Sensitive personal information:** account login credentials, which we use only to provide secure access to your account and not to infer characteristics about you

We collect this information directly from you, automatically from your use of our website and service, and from the data you upload to our service. We do not receive personal information about you from other third parties.

We use and disclose personal information for the business purposes described in Section 5. We disclose personal information to service providers for these business purposes, including providers of hosting, customer support, payment processing, email delivery, error tracking, and analytics, as identified at <https://www.geocod.io/gdpr>. We also disclose our users' email addresses to LinkedIn, a third party, as described in Section 9.

We do not sell personal information. We may share identifiers, limited to our users' email addresses (which may be hashed), with LinkedIn for cross-context behavioral advertising, as described in Section 9; California law may treat this as "sharing" personal information. We do not share any other personal information for this purpose, and we never share data you upload to or process through our service. You may opt out of this sharing at any time by emailing privacy@geocod.io. We also honor Global Privacy Control (GPC) signals as an opt-out of sharing, including for signed-in users. We have no actual knowledge that we sell or share the personal information of consumers under 16 years of age.

We use sensitive personal information only for purposes permitted by California law, namely to provide secure access to your account. We do not use or disclose sensitive personal information to infer characteristics about you, so a right to limit its use is not required.

We retain personal information as follows:

- **Payment and invoice records:** retained indefinitely for record-keeping purposes
- **Input data (addresses and coordinates):** deleted within a maximum of 45 days, or, for spreadsheet results that you save as a map, retained until you delete the map, as described in Section 16
- **Account information:** retained for as long as reasonably necessary for our business purposes, including while your account is active
- **Prospect data:** retained for as long as reasonably necessary for our business purposes
- **Analytics data:** retained for as long as reasonably necessary for our business purposes, including improving our content and product
- **LinkedIn audience lists:** retained for as long as reasonably necessary for our business purposes, including showing and measuring Geocodio advertisements on LinkedIn

Australian Residents (Privacy Act 1988)

If you are in Australia, you have the following rights under the Privacy Act 1988 and the Australian Privacy Principles:

- Right of access to the personal information we hold about you (APP 12)
- Right to request correction of personal information that is inaccurate, out of date, incomplete, irrelevant, or misleading (APP 13)
- Right to opt out of direct marketing (APP 7)
- Right to anonymity or pseudonymity where practicable (APP 2)
- Right to complain to Geocodio and, if unresolved, to the Office of the Australian Information Commissioner (OAIC)

Automated decisions — Geocodio does not use personal information in computer programs to make decisions that could reasonably be expected to significantly affect an individual's rights or interests (APP 1.7 to 1.9).

New Zealand Residents (Privacy Act 2020)

If you are in New Zealand, you have the following rights under the Privacy Act 2020 and the Information Privacy Principles:

- Right of access to personal information we hold about you (IPP 6)
- Right to request correction of personal information (IPP 7)
- Right to complain to Geocodio and, if unresolved, to the Privacy Commissioner

14. Children's Privacy and Age Restriction

Our service is only available to individuals 18 years of age or older. We do not knowingly collect personal information from anyone under 18 years of age. By using our service, you confirm that you are at least 18 years old.

If we learn that we have collected personal information from someone under 18, we will delete that information promptly. If you believe we have collected information from someone under 18, please contact us at privacy@geocodio.io.

During registration, users must accept Geocodio's Terms of Use, which require that they be at least 18 years old to create an account. This age restriction helps us comply with the Children's Online Privacy Protection Act (COPPA), the Arkansas Children and Teens' Online Privacy Protection Act (effective July 1, 2026), and various other federal and state laws with enhanced protections for minors.

15. Security of Your Information

Geocodio implements reasonable and appropriate technical and organizational security measures to protect personal information against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access. These measures include, without limitation:

- Encryption of data in transit and at rest
- Multi-factor authentication and role-based access controls
- Continuous monitoring for security threats
- Regular backups with encryption
- Documented incident response procedures
- Logical separation of customer data
- Vendor due diligence and contractual data protection obligations

For Enterprise customers, additional information about Geocodio's security program, including current SOC 2 Type II reports and completed security questionnaires, is available under the terms of the applicable Data Processing Agreement.

A summary of Geocodio's security program is published at <https://www.geocod.io/security>.

To date, Geocodio has had no known data breaches.

16. Data Storage and Retention

Personal data is stored by Geocodio on its servers and on the servers of the cloud-based service providers Geocodio engages, located in the United States and the European Economic Area (Germany). Geocodio does not host personal data in Australia or New Zealand.

- **User Database:** Encrypted and regularly backed up to Amazon S3 in the United States
- **Website Hosting:** Amazon S3 and CloudFront with SSL/TLS encryption
- **API Services and Spreadsheet Uploads:** For Self-Serve customers, processed on Hetzner servers physically located in Germany, in the European Union; for Enterprise customers, processed on AWS infrastructure in the United States
- **Payment Processing:** Handled by PCI-compliant Stripe; Geocodio does not store full payment card numbers

Service usage records, such as request counts, billing records, and account history, are retained for the duration of the customer's business relationship with Geocodio and for a period of time thereafter, for Geocodio's own operations and for historical and archiving purposes. These records do not include the content of input queries, uploaded spreadsheets,

or their results. Payment and invoice records are retained indefinitely for record-keeping purposes.

Data you submit to the service (addresses, coordinates, and other input data) is never kept longer than 45 days, with one exception: spreadsheet results that you save as a map are kept until you delete the map.

- **Input Query Data (API):** Input data submitted in API requests is deleted within a maximum of 45 days. Geocodio may use input query data during that period for quality assurance of the service.
- **Spreadsheet Uploads and Results:** Uploaded spreadsheets and their results are deleted within a maximum of 45 days, unless you save the results as a map, in which case they are retained until you delete the map.

Geocodio retains prospect data for as long as reasonably necessary for our business purposes, and then purges it from Geocodio's systems. All personal data that Geocodio controls may be deleted upon verified request from data subjects or their authorized agents.

Specific retention periods for different categories of data are set out in the Geocodio Data Retention Policy, available at <https://www.geocod.io/data-retention-policy>.

17. Our Role in Data Processing

For Your Account Information

For your personal account details — including email address, billing information, and service usage — Geocodio acts as a data controller under the EU GDPR, the UK GDPR, and Quebec Law 25; as a business under U.S. state privacy laws; and as the organization responsible for your personal information under PIPEDA, PIPA Alberta, and PIPA BC; as an APP entity under the Australian Privacy Act 1988; and as an agency under the New Zealand Privacy Act 2020.

For Data You Upload to the Service

For data that you upload to Geocodio's service for processing, Geocodio acts as a data processor under the EU GDPR and the UK GDPR; as a service provider under U.S. state privacy laws; and as a person carrying on an enterprise to whom personal information is communicated for processing under Quebec Law 25. In Australia, Geocodio processes uploaded data on the customer's behalf, and the arrangement is intended to be a "use" of the information by the customer and not a "disclosure" to Geocodio (see the OAIC Australian Privacy Principles Guidelines, paragraph 8.14). In New Zealand, Geocodio holds uploaded data as the customer's agent under section 11 of the Privacy Act 2020. You are responsible for

ensuring you have the proper legal basis and rights to process any personal data you upload and that such processing complies with all applicable privacy laws.

Required Agreements

If you process data subject to a regulatory framework requiring a signed agreement (such as the EU GDPR, the UK GDPR, HIPAA, or FERPA), you must execute the required agreement with Geocodio before transmitting covered data. Australian and New Zealand law does not mandate a signed agreement for this purpose, but we recommend one for customers in those countries, and our Data Processing Agreement includes provisions for Australia and New Zealand (Clause 16). Information about how to execute such agreements is available at <https://www.geocod.io/gdpr>.

18. Changes to This Privacy Statement

We will notify users of material changes to this Privacy Statement via prominent notice on our website and through an updated effective date on this document. Material changes that expand our use of personal information may require renewed consent.

19. Questions, Concerns, or Complaints

If you have questions, concerns, complaints, or would like to exercise your rights, please contact us at privacy@geocod.io.

For privacy-related contractual or compliance inquiries from Enterprise customers, please contact your account representative or sales@geocod.io.

20. Regulatory Authorities

If we cannot resolve your privacy concern, you may contact the relevant regulatory authority for your jurisdiction:

Europe and United Kingdom

- **European Union residents:** Your national data protection authority (a list is available on the European Data Protection Board website at edpb.europa.eu)
- **United Kingdom residents:** The Information Commissioner's Office (ICO) — ico.org.uk

Canada

- **All Canadian residents:** The Office of the Privacy Commissioner of Canada (OPC) — priv.gc.ca
- **Quebec residents:** Commission d'accès à l'information du Québec (CAI) — cai.gouv.qc.ca
- **Alberta residents:** Office of the Information and Privacy Commissioner of Alberta — oipc.ab.ca
- **British Columbia residents:** Office of the Information and Privacy Commissioner for British Columbia — oipc.bc.ca

United States

- **California residents:** California Privacy Protection Agency — cppa.ca.gov
- **Colorado residents:** Colorado Attorney General's Office
- **Connecticut residents:** Connecticut Attorney General's Office
- **Residents of other U.S. states with comprehensive privacy laws:** Your state Attorney General's Office

Australia and New Zealand

- **Australian residents:** The Office of the Australian Information Commissioner (OAIC) — oaic.gov.au
- **New Zealand residents:** The Office of the Privacy Commissioner — privacy.org.nz

This Privacy Statement applies to all users and services provided by Geocodio. We are committed to maintaining compliance with all applicable privacy laws and will update this Statement as new laws take effect or existing laws are amended. The plain-language summary version of this Privacy Statement is available at <https://www.geocod.io/privacy>.

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