

Privacy Policy

LAST UPDATED: SEPTEMBER 9, 2026

This Privacy Policy (the “Privacy Policy”) serves to inform you of our policies and procedures regarding the collection, use and disclosure of the information we receive when you access and use the website (the “Site”), services, software, content, and all other products and services (all of the foregoing collectively, the “Services”) owned, controlled or offered, directly or indirectly, by Runway Financial, Inc. (together with its subsidiaries and affiliates, “Runway”, “we,” “our” or “us”). Runway believes that the privacy of its users is paramount and strives to use Personal Information (as defined below) only in ways outlined in this Privacy Policy. The Privacy Policy is incorporated by reference into our Terms of Use, currently available at <https://cfo.ai/tou> (the “Terms of Use”). By using the Services, you hereby warrant and represent that you have read, understand and agree to this Privacy Policy and the Terms of Use, that you are over 18 years of age. PLEASE DO NOT USE, INSTALL OR ACCESS THE SERVICES IF YOU DO NOT AGREE TO THIS PRIVACY POLICY.

1. What we mean by Personal Information

For purposes of this Privacy Policy, “Personal Information” means any information from or about a person that either identifies that person directly or that makes that person identifiable when it is combined with other information from or about that person from any source.

2. Information you provide to us

When you use the Services or otherwise communicate with us, we collect information that you provide to us directly. For example, we collect information in the following circumstances: you (i) visit the Site; (ii) register for the Services or create an account or profile or accept the creation of an account or profile on your behalf (an “Account”); (iii) access the Services through social networking sites or third-party services; (iv) subscribe to newsletters; (v) purchase a product or service on the Site; (vi) invite your friends to join the Services, “share” the Services on social networking sites or perform other similar actions; (vii) request technical support; (viii) otherwise use our online Services where Personal Information is required for such use and/or participation; and (ix) when you contact us via the Site or when you otherwise communicate with us. You can choose not to provide information that is requested of you by us; however, this may limit your ability to use or access the Services.

The information you provide to us directly may include, without limitation, the following information that may, alone or in combination with other data, constitute Personal Information:

- Information you provide in connection with completing a transaction or purchase using the Services, including your name, e-mail, and any other information you decide to provide;
- Information you provide via email by using the contact details listed on various parts of the Site, including your name, e-mail, inquiry, and any other information you decide to provide;
- Information you provide in order to subscribe to our newsletters and updates, including your email address or any other information you decide to provide us with. You may always unsubscribe from these emails by following any included instructions or by emailing security@cfo.ai

- If you are one of our customers, suppliers or prospects, we may process limited Personal Information in the course of our business relation with you, for example when you place an order, request a demo or vice versa. Such Personal Information may include your name, company, title, e-mail address, telephone number, address, order details, and where applicable and relevant, credit registrations and credit limits;
- Transaction and limited (non-PCI) payment data; and
- Any other information you may want to share with us, such as Personal Information related to recruitment / job applications.

Moreover, if you contact us, a record of such correspondence may be kept.

Additionally, if another user refers you to us by providing us with your e-mail address, we may send you a message. However, we will use your e-mail address only to send such other user's message unless you otherwise affirmatively provide your information to us.

What you can submit on this website

Our contact forms collect business contact details so we can reply. When you send one, we may attach the page you sent it from, campaign or referral information, a browser identifier, and any consent choice stored in your browser. The form on [Privacy choices](#) collects your email address, your request, and any available browser identifier, so we can honor it. We may also keep audit records of consent choices and privacy signals, including when we received them and the policy version.

Automatically collected information

Most of the data we collect in and through the Site and the Services is technical in nature and is collected and processed automatically through so-called application programming interfaces, software development kits, cookies and similar software-based technologies. Alone or in combination with other data, such automatically collected data may constitute Personal Information. The data we may collect by automated means may include, without limitation:

- Device data: including, but not limited to, data on device advertising IDs and similar hardware qualifiers, and precise location data.
- Usage data: including, but not limited to, search terms entered and pages viewed.
- Network and internet information: including, but not limited to, URLs, Internet Protocol addresses, bounce rates, use of spoofing, active (TCP/IP) ports, number of sessions initiated, click streams, location information and network/Wi-Fi access points.
- Information we collect on the use of the Site via cookies: please see the "How We Use Cookies and Other Technologies" section below for more information.

When the analytics setting allows it, our analytics service collects data such as time of visit, pages visited, time spent on each page, the Internet Protocol address, and the operating system of the device used. It uses cookies and local storage. We start it only while analytics is allowed, and tell it to stop capturing when analytics is turned off. You can change this setting at any time in the cookie banner or on [Privacy choices](#).

Information you share on third-party websites or through social media services

The Services may include links to third-party websites and social media services where you will be able to post comments, stories, reviews or other information. Your use of these third-party websites and social media services may result in the

collection or sharing of information about you by these third-party websites and social media services. We encourage you to review the privacy policies and settings on the third-party websites and social media services with which you interact to make sure you understand the information that may be collected, used, and shared by those third-party websites and social media services.

How we use cookies and other technologies

Some of the features on the Site and the Services require the use of “cookies” - small text files that are stored on your device’s hard drive. We use cookies to measure which pages are being accessed, and which features are most frequently used. This enables us to continuously improve the Site to meet the needs of our visitors.

The following sets out how we may use cookies and your options for managing cookie settings:

The cookies this site sets

We currently set these first-party cookies:

- **cfo_consent:** your consent choice and the policy version. Up to one year.
- **cfo_region:** your country, to determine which consent rules apply. Up to one day.
- **cfo_visitor_id:** a random identifier that distinguishes browsers for analytics. Up to 400 days.
- **cfo_attr:** campaign or referral information supplied by a link or referring site. Up to 90 days.
- **cfo_fp_optout:** records that you opted out. Up to one year.

cfo_visitor_id is set on page load, and **cfo_attr** may be set when attribution information is available. This can happen before you respond to the banner, unless you previously opted out. Both are available across the cfo.ai domain, including app.cfo.ai. The opt-out on [Privacy choices](#) clears them and keeps them from returning.

Cookies and storage governed by your consent

Our analytics provider sets its own cookies and local storage entries. We do not start it while the analytics setting is off.

Where local law requires consent before measurement, analytics and marketing stay off until you accept them. Where local law allows measurement on notice with an opt-out, we may treat them as on until you turn them off, in the banner or on [Privacy choices](#). A Global Privacy Control signal keeps marketing off regardless of any other choice. It does not affect analytics.

When the marketing setting is on, we may start advertising technologies from providers such as Google, Meta, LinkedIn, Reddit and HubSpot. These providers can associate your visit with profiles they hold about you. We do not start them while the setting is off.

We may use similar technologies in our emails to measure campaign response.

Measurement that runs for every visitor

Our host measures traffic and performance for every visitor, including page addresses and their parameters, referrers, approximate location, device and browser details, and a session identifier. It does not use cookies or other browser storage.

Before we store detailed events, we remove the IP address and device identifier from the feed. We rely on our legitimate interest in measuring and improving the site. To object, write to us at security@cfo.ai.

3. Use of collected information

We process business contact information to respond to requests, to take steps toward a contract, and for our legitimate interest in communicating with prospective customers. We process privacy requests and consent records to meet legal obligations. We rely on consent for optional analytics and marketing where consent is required, and otherwise on our legitimate interests in operating, securing, measuring and improving the Services, including where a region's law allows measurement on notice with an opt-out. We rely on those same legitimate interests for the purposes listed below, except where we say we rely on consent or on a legal obligation. You may withdraw consent at any time, which does not affect processing that was lawful before you withdrew it.

You are not required to give us any of this information. It is not a statutory or contractual requirement, and none of it is a condition of entering into a contract with us. If you do not provide it, we may be unable to reply to you or to act on a request you make.

We use the information you provide to us for the following purposes: (i) to further our legitimate interests in providing the Services, including without limitation to collect and remit payment for paid features, (ii) to administer your use of the Services and any Accounts you may have with us, (iii) to personalize your experience, (iv) to provide to you Service announcements or inform you of new releases and features, (v) to provide you with further information and offers from us or third-parties that we believe you may find useful or interesting, such as newsletters, marketing or promotional materials, (vi) to perform tasks on behalf of and according to instructions of a third-parties, such as payment processors, third-party-service providers or our advertising partners, (vii) to enforce our Terms of Use, (viii) to resolve any disputes between users of the Site or between such users and us, (ix) comply with a legal requirement or process, including, but not limited to, civil and criminal subpoenas, court orders or other compulsory disclosures; (x) to further our legitimate interest in protecting our rights, property, or safety and the rights, property and safety of the Services, our users or the public, and (xi) to contact you to obtain feedback from you regarding the Site and the Services.

In addition to the purposes described above, we use the information collected automatically to (i) to further our legitimate interests in monitoring and analyzing the use of the Services and for the technical administration of the Site, (ii) improve the Site and the Services, (iii) generate and derive useful data and information concerning the interests, characteristics and website use behavior of our users, and (iv) verify that users of the Services meet the criteria required to process their requests. We and or our advertising partners may use demographic and geo-location, as well as information logged from your hardware or device, including data such as IP address, device model and ID, MAC address, operating system, application usage data, device time zone, region and language, and click ID, to ensure relevant advertising is presented within the Services.

How to change your preferences

We operate in line with the GDPR data protection guidelines. We respect your rights and will respond to any request for access to personal information and requests to delete, rectify, transfer, data and to stop processing. We will also advise you on how to complain to the relevant authorities. Where possible any requests or objections should be made in writing to the Data Controller, or you can visit our website, call, or email us to contact us to exercise your rights, make a complaint, or change your preferences at any time.

Opting out at a later date

You have the right to amend or withdraw your consent at any time, including opting out of marketing communications or the processing of financial data. You can also object to the processing of your data and request its deletion. We respect all user rights as defined in the GDPR. If you have any questions, comments, or wish to file a complaint, please contact us.

How we store and process your data

Your data will be collected, stored and processed securely. In case where we transfer your data internationally, we will ensure we take appropriate precautions to protect this data. We keep your data for as long as we need it for the purposes set out in this policy, and for as long as the law requires. See Section 10.

We will only use your personal data for the purposes for which it was collected unless we reasonably believe that another use is necessary and compatible with the original purpose. If you would like more information about the compatibility of a new purpose with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and explain the legal basis for doing so.

In certain circumstances, we may be legally required to disclose your personal information without your knowledge. These circumstances include legal obligations, ongoing or prospective legal proceedings, or to establish, exercise, or defend our legal rights. This may involve providing information to others for fraud prevention or credit risk reduction. We may also disclose information if we believe a court or other competent authority would likely order us to do so.

4. Third parties we share personal information with

We may disclose Personal Information you provide to us or that we collect automatically on the Site and in and through the Services with the following categories of third parties:

- Service providers who process data on our behalf in order to operate this website, currently including hosting, website measurement, database, analytics, and business communication providers. Write to us for the current list;
- Public authorities, such as law enforcement, if we are legally required to do so or if we need to protect our rights or the rights of third parties; and
- Our subsidiaries and affiliates; or a subsequent owner, co-owner or operator of the Site and/or the Services and their advisors in connection with a corporate merger, consolidation, restructuring, the sale of substantially all of our stock and/or assets, or in connection with bankruptcy proceedings, or other corporate reorganization, in accordance with this Privacy Policy.

5. Links to other websites

We frequently make content or services from other websites available to you from links located on the Site. We may present links in a format that enables us to keep track of whether these links have been followed. In addition, you may opt to link your Account to your social media account or other accounts, such as Google, in accordance with your Account settings (which you may change at any time) and respective policies of these third-parties. This Privacy Policy applies only to the Site and the Services. We do not exercise control over third-party services or other websites that provide information, or links from within the Site or the Services. Your interactions with these third-party services are governed by the privacy policy of the company providing it. These other sites and services may place their own cookies or other files on your

computer's browser, collect data or solicit Personal Information from you. Other websites and services follow different rules regarding the use or disclosure of the Personal Information that you submit, and the collection and use of such information and access of any third-party websites are subject to such third-party's privacy policy. We encourage you to read the privacy policies and other terms of such third-parties before using their services.

6. Security

We understand the importance of privacy and security of Personal Information to our users and have made them a priority. Runway uses a variety of industry-standard security technologies and procedures to help protect Personal Information about you from unauthorized access, use, or disclosure and trains Runway employees on privacy and security issues. However, we cannot guarantee that unauthorized third-parties will never be able to overcome those measures or use your Personal Information for improper purposes, and we do not promise that Personal Information about you or private communications will be protected from unauthorized disclosure or use.

We will report a personal data breach to the relevant supervisory authority without undue delay and, where feasible, within 72 hours of becoming aware of it, unless the breach is unlikely to result in a risk to your rights and freedoms. Where a breach is likely to result in a high risk to you, we will also tell you without undue delay. If you have any questions or concerns regarding your data usage, please contact us.

7. Managing your privacy

We keep your data on your behalf and for your benefit. You can correct or terminate and delete your Account information by following the instructions on the Services or by e-mail at security@cfo.ai, which you may also access for further assistance and questions regarding the Privacy Policy or for a copy of your Account data. If you cancel your Account or request us to delete your information, Runway will limit its access to Personal Information to perform what is requested by you and will delete information accessible to Runway within 30 days.

8. California residents

California Civil Code Section 1798.83 requires certain businesses that share customer Personal Information with third-parties for the third-parties' direct marketing purposes to respond to requests from California customers asking about the businesses' practices related to such information-sharing. We currently do not share or disclose your Personal Information to third-parties for the third-parties' direct marketing purposes. If we change our practices in the future, we will implement an opt-out policy as required under California laws.

Furthermore, subject to certain exemptions, California residents have the following rights with respect to Personal Information we may have collected about them:

Requests to know

You have the right to request that we disclose:

- The categories of Personal Information we have collected about you;
- The categories of Personal Information about you we have sold or disclosed for a business purpose;

- The categories of sources from which we have collected Personal Information about you;
- The business or commercial purposes for selling or collecting Personal Information about you;
- The categories of Personal Information sold or shared, if any, about you, as well as the categories of third-parties to whom the Personal Information was sold, by category of Personal Information for each party to whom Personal Information was sold; and
- The specific pieces of Personal Information collected.

You may submit a request to know by e-mail at security@cfo.ai. The delivery of our response may take place electronically or by mail. We are not required to respond to requests to know more than twice in a 12-month period.

We do not sell, and have not in the prior 12 months sold, Personal Information about California residents. Therefore, we have not included a “Do Not Sell My Personal Info” link on our Site. If our practices change, we will update this Privacy Policy and take any other necessary action to comply with applicable law. We do, however, disclose Personal Information for business purposes as described in the “third-parties We Share Personal Information With” section above.

Requests to delete

You have the right to request that we delete any Personal Information about you that we have collected. Upon receiving a verified request to delete Personal Information, we will do so unless otherwise required or authorized by law. You may submit a request to delete Personal Information via e-mail at security@cfo.ai.

Authorized agents

You may designate an authorized agent to make requests on your behalf. You must provide an authorized agent written permission to submit a request on your behalf, and we may require that you verify your identity directly with us. Alternatively, an authorized agent that has been provided power of attorney pursuant to Probate Code sections 4000-4465 may submit a request on your behalf.

Methods for submitting consumer requests and our response to requests

You may submit a request for access and requests to delete Personal Information about you by emailing security@cfo.ai.

Upon receipt of a request, we may ask you for additional information to verify your identity. Any additional information you provide will be used only to verify your identity and not for any other purpose.

We will acknowledge the receipt of your request within 10 days of receipt. Subject to our ability to verify your identity, we will respond to your request within 45 days of receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. In order to protect your privacy and the security of Personal Information about you, we may need to verify your identity before processing your request. In some cases we may need to collect additional information to verify your identity, such as a government issued ID.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request’s receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

The right to non-discrimination

You have the right not to be discriminated against for the exercise of your California privacy rights described above. Unless permitted by the CCPA, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

9. International transfers of personal information

Runway is based in the United States. Personal Information collected through the Services may be transferred to and processed in the United States and other countries where we and our service providers operate. Where a transfer is made from the EEA, UK, or Switzerland to a country that does not have an adequacy decision, we rely on appropriate safeguard such as primarily through the European Commission's Standard Contractual Clauses (and UK Addendum, as applicable). We take additional measures as needed to protect your Personal Information.

You may contact us to obtain a copy of the applicable transfer safeguards or to learn more about them.

10. Data retention

We keep Personal Information related to your Account for as long as it is needed to fulfill the purposes for which it was collected, to provide our services, to deal with possible legal claims, to comply with our business interests and/or to abide by all applicable laws. Thereafter, we either delete Personal Information about you or de-identify it. Please note that even if you request the deletion of Personal Information about you, we may be required (by law or otherwise) to retain the Personal Information and not delete it. However, once those requirements are removed, we will delete Personal Information about you in accordance with your request.

How long that is depends on the information and why we hold it. The criteria we use are the ones above: what the information was collected for, whether we still need it for that, and what the law requires us to keep.

11. Changes to the Privacy Policy

We may update this policy as our Services change. The date at the top of this page shows the latest update. We will provide any notice required by law. Questions about this policy go to security@cfo.ai. Your continued use of the Services after any change in this Privacy Policy will constitute your acceptance of such change.

12. Contacting us

Runway Financial, Inc. is registered in United States of America. The Data Protection Lead is Mike Timmerman. You can contact us in any of the following ways:

Data Protection Lead: Mike Timmerman

Company: Runway Financial, Inc.

Address: 25 Stillman St, 2nd Floor, San Francisco, CA 94107

Contact Number: (954) 802-7093

Email: security@cfo.ai

OUR ARTICLE 27 REPRESENTATIVE

We have appointed EU and UK Representatives under Article 27 of the EU GDPR and UK GDPR respectively. Our appointed representatives are:

Our UK Representative:

Under Article 27 of the UK Data Privacy Act, we have appointed a UK Representative to act as our data protection agent. Our nominated UK Representative is: GDPR Local Ltd.

Adam Brogden contact@gdprlocal.com

Tel +44 1772 217800

1st Floor Front Suite

27-29 North Street, Brighton

England

BN1 1EB

Our EU Representative:

Under Article 27 of the GDPR, we have appointed an EU Representative to act as our data protection agent. Our nominated EU Representative is: Instant EU GDPR Representative Ltd.

Adam Brogden contact@gdprlocal.com

Tel +35315549700

INSTANT EU GDPR REPRESENTATIVE LTD

Office 2,

12A Lower Main Street, Lucan Co. Dublin

K78 X5P8

Ireland

If you have any questions or comments about this Privacy Policy, wish to exercise your information rights in connection with the personal data you have shared with us or wish to complain, please contact: security@cfo.ai. We aim to process data protection requests within 30 days, SAR responses are usually free, but we reserve the right to charge for excessive or

unfounded requests. We fully comply with Data Protection legislation and will assist in any investigation or request made by the appropriate authorities.

If you remain dissatisfied, then you have the right to apply directly to your local data protection authority.

You can find the list here: https://www.edpb.europa.eu/about-edpb/about-edpb/members_en