LAST UPDATED OCTOBER 30, 2026

PRIVACY NOTICE

Winter International LLC ("Bloom," "we," "our," or "us")

Winter International LLC ("Bloom," "we," "our," or "us") operates websites located at, but not limited to, www.bloomgrowth.com, www.bloomgrowthcoach.com, and app.bloomgrowth.com. We respect the privacy of your information. This Privacy Notice is designed to assist you in understanding how we collect, use, share, and safeguard your information. This Privacy Notice applies to individuals who access this website ("Site") and any of our online and offline services ("Services").

From time to time, we may change this Privacy Notice. If we do, we will post an amended version on this webpage with a new "last updated" date. If we make material changes, we will provide you with additional notice, such as adding a statement on the homepages of our Site. Please review this Privacy Notice periodically.

This Privacy Notice covers the following topics:

1. PERSONAL DATA WE COLLECT
2. HOW WE USE YOUR PERSONAL DATA
3. HOW WE SHARE YOUR PERSONAL DATA
4. GENERATIVE AI FEATURES, MEETING RECORDING, AND TRANSCRIPTION
5. COOKIES AND OTHER TRACKING TECHNOLOGIES
6. UNIVERSAL OPT-OUT MECHANISMS
7. SECURITY
8. DATA RETENTION
9. THIRD-PARTY LINKS
10. CHILDREN'S PRIVACY
11. YOUR PRIVACY RIGHTS - UNITED STATES
12. YOUR PRIVACY RIGHTS - CANADA
13. ACCESSIBILITY
14. HOW TO CONTACT US

1. PERSONAL DATA WE COLLECT

We collect personal data from you through your use of the Site and Services. Personal data is information that is linked, or reasonably linkable, to an identified or identifiable individual. We collect the following types of personal data:

Personal Data You Provide

Depending on how you interact with our Site and Services, we will collect the following personal data that you voluntarily provide to us for the following purposes:

- **Login.** When you sign into your account, you will provide us with your username and password that you entered when creating your account. If you are creating a new organizational account or signing up for a free trial, you will provide us with your first and last name, email address, phone number, affiliated company, and username and password.
- **Purchase our Services.** If you purchase our Services, you will provide your billing information, which may include your credit card information, name, and billing address. We do not collect or process financial information. All financial information is processed by Stripe and Hubspot.
- **Contact Us.** If you contact us through the form on our Site, you will provide your name, email address, phone number, subject of message, and any information you choose to enter in your message.

- **Marketing Events.** When you interact with us at trade shows, industry events, or through other marketing activities, we may collect your name, email address, phone number, company name, and other contact information you choose to provide.
- **Marketing Communications.** If you sign up to receive communications from us through the above methods, you will provide us with your email address and phone number, among other information. To unsubscribe from our marketing emails, you can click the unsubscribe link included in the footer of our emails. To be removed from our telephone communications, you can text STOP to a text message you've received or let us know you'd like to unsubscribe through a phone call you may receive from us.
- **Careers.** If you apply for a job with us through the Careers page on our Site, you will be redirected to a third-party website that will prompt you for your first and last name, email address, phone number, address, employment history and/or resume, and other information related to the position you are applying for. You may be able to opt into text messages from us here, and can unsubscribe from them using the methods described above.

Personal Data as You Navigate Our Site

We automatically collect certain personal data through your use of our Site and our use of cookies and other tracking technologies, such as the following:

- **Usage Information.** For example, the pages on the Site you access, the frequency of access, and what you click on while on the Site.
- **Device Information.** For example, hardware model, operating system, application version number, and browser.
- **Mobile Device Information.** Aggregated information about whether the Site is accessed via a mobile device or tablet, the device type, and the carrier.
- **Location Information.** Non-specific geolocation information from Site visitors on a city-regional basis.

For more information on our cookie usage see our "COOKIES AND OTHER TRACKING TECHNOLOGIES" section below or visit our Cookie Policy.

Personal Data We Collect About You from Other Sources

In some cases, we may receive personal data about you from other sources. This can include, for example, operating systems and platforms, social networks, and data and Customer Relationship Management partners.

2. HOW WE USE YOUR PERSONAL DATA

In addition to the purposes stated above, we may use all the personal data we collect in accordance with applicable law such as to:

- Maintain and improve our Site;
- Protect the security and integrity of our Site;
- Investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or violations of our Terms of Service, and to otherwise fulfill our legal obligations;
- Monitor compliance with and enforce this Privacy Notice and any applicable agreements and policies;
- Defend our legal rights and the rights of others;
- Fulfill any other purposes for which you provide it;
- For any purpose that is reasonably necessary to or compatible with the original purpose for which we collected the personal data as disclosed to you; and
- Comply with applicable law.

3. HOW WE SHARE YOUR PERSONAL DATA

We may share the personal data that we collect about you in the following ways:

- With vendors who perform data or Site-related services on our behalf (e.g., email, hosting, maintenance, backup, analysis, payment, etc.);
- To the extent that we are required to do so by law;
- With vendors to prepare, deploy, and analyze advertising content;
- In connection with any legal proceedings or prospective legal proceedings;
- To establish, exercise, or defend our or a third party's legal rights, including providing information to others for the purposes of fraud prevention;
- With any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal data where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal data;
- With any other person or entity as part of any business or asset sale, equity transaction, merger, acquisition, bankruptcy, liquidation, or similar proceeding, or in preparation for any of these events and that person or entity may use your personal data for their own purposes;
- With any other person or entity where you consent to the disclosure; and
- For any other purpose disclosed by us when you provide the personal data or for any other purpose we deem necessary, including to protect the health or safety of others.

For more information on how we sell or share personal data with third parties, see our "YOUR PRIVACY RIGHTS" sections below.

4. GENERATIVE AI FEATURES, MEETING RECORDING, AND TRANSCRIPTION

Bloom Growth offers optional features that allow meeting leaders to record meetings and generate written transcripts, notes, and summaries using generative AI tools. These features are off by default. Recording does not occur unless a meeting leader turns it on. For organizations with members located in regions with heightened privacy requirements, including, for example, the European Economic Area (EEA), the United Kingdom, Switzerland and Brazil, the features are disabled by default at the organizational level and must be enabled by an administrator of that organization.

Consent before recording

When a meeting leader chooses to record, every participant is shown a notice on desktop and mobile, and is asked for their consent before recording begins. If any participant declines, the recording does not start; similarly, if recording is already underway when someone declines, it pauses immediately. No user can consent for other participants. Participants who join later in the call when initial voice consent was already captured are asked for their consent upon joining. A visible recording icon is shown while recording is in progress, and the meeting summary includes the duration of the recording and how long it was paused.

Our servers log the consent responses and the instances a recording was started, paused, resumed, and stopped with timestamps, to preserve a record of the meeting and related consent. The identities of participants who declined the recording are not disclosed to other participants. No participant may be penalized for declining.

In the instance where some or all participants are together in a room for a meeting, the meeting leader must confirm that everyone present has been informed that the meeting will be recorded and transcribed. Upon the group's consent, an audible announcement plays in the room stating that the meeting is being recorded and transcribed.

What we process

When these features are enabled, we process participants' audio, the resulting voice-to-text transcript, and any AI-generated summary, notes, or action items. This content may include the voices and statements of participants.

We do not create voiceprints or otherwise identify or categorize individuals by the characteristics of their voice; analyze voices, video, or meeting content to infer any participant's emotions, mood, sentiment, or level of engagement; or offer any feature internally that does so.

How we use it

We provide the recording feature solely for the purpose of providing the ability to create, store, and display the recording, transcript, and summary to your organization.

We do not use your meeting recordings, transcripts, audio, prompts, or AI outputs to train or improve any AI model, and we contractually require our service providers not to do so either.

We also offer optional AI text assistance for typed or uploaded documents. Suggested text may be accepted, edited, or discarded. This content is processed only to provide suggestions by the providers and in the environment described below, and is not used to train any AI model.

AI service providers

Speech-to-text transcription is performed by Deepgram. AI meeting summaries and other AI-assisted suggestions are generated using Anthropic Claude models hosted on AWS Bedrock, within our own AWS environment in the United States. The model provider does not receive your content for these features. Where you use our meeting-preparation AI features, relevant meeting content is processed by Anthropic as our subprocessor under written contract.

Deepgram, Anthropic, and our other Subprocessors are listed on our Subprocessors page. Any updates to our AI service and tool providers will be reflected on this page. We may change the underlying AI models on notice as described in our Terms of Service.

Other AI-assisted features. Elsewhere in the Services we offer optional AI assistance that works on content your team has typed or uploaded for example, suggesting a short title for an answer you have written, grouping issues by theme, or drafting a goal from a document you provide. These suggestions are shown to you to accept, edit or discard. The same commitments apply: the content is processed only to provide the suggestion, by the providers and in the environment described above, and it is not used to train any AI model.

Disclaimer

AI-generated transcripts and summaries may be incomplete or incorrect. Generative AI tools are intended to assist your team, but cannot guarantee 100% accuracy. The tools may not produce a verbatim record, and they should not be relied on as the sole basis for decision-making about a person.

Content generated by these features is identified as AI-generated within the product. The AI models we use may imbue an industry-standard, imperceptible marker indicating that text outputs are machine-generated and controlled by the vendor. This marker does not change the text you see and it contains no information about you, your organization, or your meeting.

The organization and the meeting leader who enable recording are responsible for obtaining any consent required by applicable law before recording participants. Our notices, indicators and audible announcements are provided to help you do that. Please see our Terms of Service for more information.

Retention

Your organization controls who may record and delete recordings, transcripts, and summaries at any time. We also automatically delete stored transcripts, AI summaries, recording-consent records, and activity records after one year. Notes, to-dos, issues, and other workspace records that your team creates from a meeting, including items your team accepts from AI suggestions, are your organization's ordinary workspace data and remain in your organization's cloud storage until your organization deletes them.

We also retain aggregate statistics about how the Services are used, such as the number and length of meetings. These statistics do not identify you or any participant, and do not contain meeting content. These statistics are not required to be deleted under relevant data privacy laws because they do not contain personal data or personal information.

5. COOKIES AND OTHER TRACKING TECHNOLOGIES

How We Use Cookies

Like many other companies, we use cookies and other tracking technologies (collectively, "Cookies"). Cookies are small files of information that are stored by your web browser software on your computer hard drive, mobile, or other devices.

We use Cookies to:

- Estimate audience size and usage patterns;
- Understand and save your preferences for future visits, allowing us to customize the Site to your individual needs;
- Advertise new content and services that relate to your interests;
- Keep track of advertisements and search engine results;
- Provide security and protection from spam and bots;
- Compile aggregate data about site traffic and site interactions to resolve issues and offer better site experiences and tools in the future; and
- Recognize when you return to the Site.

We set some Cookies ourselves, while separate entities set other Cookies. We use Cookies other entities set to provide us with useful information, to help us improve our Site, to conduct advertising, and to analyze the effectiveness of advertising. Some of the analytics cookie services we use include Google Analytics and Hotjar.

How You Can Opt Out of Cookies

When you first visit our Site, we will present you with a banner that offers you choices about whether to accept or reject nonessential cookies or tracking technologies. If you wish to change your Cookie preferences, you can do so by visiting https://www.bloomgrowth.com/ and choosing Consent Preferences at the bottom of the page.

You can also block Cookies by changing your Internet browser settings to refuse all or some Cookies. If you choose to block all Cookies (including essential Cookies) you may not be able to access all or parts of the Site. Learn more about Cookies and how to manage them by visiting www.AboutCookies.org or www.allaboutcookies.org. For more information about Cookies on our Site, please visit our Cookie Policy.

6. UNIVERSAL OPT-OUT MECHANISMS

The Site recognizes the Global Privacy Control ("GPC") signal. If you are using a browser setting or plug-in that sends an opt-out preference signal to each website you visit, we will treat that as a valid request to opt out. To download and use a browser supporting the GPC browser signal, click here: https://globalprivacycontrol.org/orgs. If you choose to use the GPC signal, you will need to turn it on for each supported browser or browser extension you use.

Some internet browsers incorporate a "Do Not Track" feature that signals to websites you visit that you do not want to have your online activity tracked. Given that there is not a uniform way that browsers communicate the "Do Not Track" signal, the Site does not currently interpret, respond to, or alter its practices when it receives "Do Not Track" signals.

7. SECURITY

We maintain commercially reasonable security measures to protect the personal data we collect and store from loss, misuse, destruction, or unauthorized access. However, no security measure or modality of data transmission over the Internet is 100% secure. Although we strive to use commercially acceptable means to protect your personal data, we cannot guarantee absolute security.

8. DATA RETENTION

We retain your personal data for as long as necessary to fulfill the purposes described in this Policy, such as to provide you with the service you have requested, and to satisfy any legal, accounting, contractual, or reporting requirements that apply to us. To determine the appropriate retention period for different categories of data, we may consider factors such as the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure, the purposes for which it is processed, whether those purposes can be achieved by other means, and applicable legal requirements.

9. THIRD-PARTY LINKS

The Site may contain links that will let you leave the Site and access another website. Linked websites are not under our control. We accept no responsibility or liability for these other websites.

10. CHILDREN'S PRIVACY

The Site is not intended for children under 18 years of age. We do not knowingly collect, use, or disclose personal data from children under 18.

11. YOUR PRIVACY RIGHTS - UNITED STATES

Depending on the state in which you reside, you may have certain privacy rights regarding your personal data. For example, California, Colorado, Connecticut, Delaware, Oregon, Texas, and other states have passed privacy laws. If you are a California resident, please see our "NOTICE TO CALIFORNIA RESIDENTS" section. For other state residents, your privacy rights may include (if applicable):

- The right to confirm whether or not we are processing your personal data and to access such personal data and the categories of personal data we are processing or have processed;
- The right to obtain a copy of your personal data that we collected from and/or about you in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the information to another controller without hindrance, where the processing is carried out by automated means;
- The right to obtain a list of specific third parties to which we have disclosed personal data.
- The right to obtain a list of categories of third parties to which we have disclosed your personal data;
- The right to delete personal data that we collected from and/or about you, subject to certain exceptions;
- The right to correct inaccurate personal data that we maintain about you, subject to certain exceptions;
- The right, if applicable, to opt out of the processing of your personal data for purposes of (1) targeted advertising; (2) the "sale" of your personal data (as that term is defined by applicable law); and (3) profiling in furtherance of decisions that produce legal or similarly significant effects concerning you;

- If, as a Minnesota resident, your personal data is profiled in furtherance of decisions that produce legal or similarly significant effects concerning you, the rights to question the result of the profiling, to be informed of the reason that the profiling resulted in the decision, and, if feasible, to be informed of what actions you might have taken to secure a different decision (and the actions that you might take to secure a different decision in the future). If applicable, you also have the right to review the personal data used in the profiling and, if the decision is determined to have been based upon inaccurate personal data, the right to have the data corrected and the profiling decision reevaluated based upon the corrected data;
- If we are required by applicable law to obtain your consent to process sensitive personal data, the right to withdraw your consent; and
- The right not to receive discriminatory treatment by us for the exercise of your privacy rights.

We use Cookies to display advertisements about our products to you on nonaffiliated websites, applications, and online services. This is "targeted advertising" under applicable privacy laws. When we engage in those activities, we "sell" personal data (i.e., share information from cookies) to third-party advertisers and analytics companies as defined by certain privacy laws, but we do not receive monetary gain from this sharing of data. We also do not use personal data for profiling in furtherance of decisions that produce legal or similarly significant effects concerning individuals.

To exercise your rights, please submit a request via email at compliance@bloomgrowth.com or via phone through the phone numbers provided in our "HOW TO CONTACT US" section below. If legally required, we will comply with your request upon verification of your identity and, to the extent applicable, the identity of the individual on whose behalf you are making such request. To do so, we will ask you to verify data points based on information we have in our records. If you are submitting an opt-out request on behalf of another individual, please use the same contact methods described above. We will process authorized agent requests in accordance with applicable law. If we refuse to take action regarding your request, you may appeal our decision by replying to the email you received from us in response to your request. If you would like to opt out of targeted advertising, you may alter your cookie preferences by visiting https://www.bloomgrowth.com/ and choosing Consent Preferences at the bottom of the page.

12. YOUR PRIVACY RIGHTS - CANADA

Federal Privacy Law (PIPEDA), Alberta (PIPA), and British Columbia (PIPA)

Canada's federal private sector privacy law, the Personal Information Protection and Electronic Documents Act (PIPEDA), governs the collection, use, and disclosure of personal information by private sector organizations in the course of commercial activities. PIPEDA permits implied consent for non-sensitive personal data, including for behavioral advertising and standard analytics tracking cookies, where users are provided with clear notice of the data practices and a meaningful opt-out mechanism. Alberta and British Columbia have their own substantially similar private sector privacy legislation (Personal Information Protection Act); the same implied consent framework applies in those provinces.

By visiting our Site, you acknowledge that we use cookies and tracking technologies as described in our Cookie Policy. You may withdraw or modify your consent at any time by updating your cookie preferences by visiting https://www.bloomgrowth.com/ and choosing Consent Preferences at the bottom of the page. For an explanation of how long we retain Personal Information, please see the "DATA RETENTION" section above.

Quebec (Law 25)

Residents of Quebec are subject to Quebec's Act respecting the protection of personal information in the private sector as amended by Law 25, which requires opt-in consent before any non-essential cookies are loaded on your device. If you are visiting our Site from Quebec, you will be presented with a cookie consent banner requiring your affirmative acceptance before any non-essential cookies are activated. You may withdraw your consent at any time by updating your cookie preferences by visiting https://www.bloomgrowth.com/ and choosing Consent Preferences at the bottom of the page.

Cross-Border Data Transfers

We may process, store, and transfer your personal information to the United States. U.S. privacy laws may not be as comprehensive as Canadian law, and U.S. governments, courts, law enforcement, or regulatory agencies may be able to obtain access to your personal information under applicable U.S. laws. By using our Site, you consent to this transfer in accordance with applicable law.

Exercising Your Rights

If you wish to access, correct, or request deletion of your personal information, or to withdraw consent for the use of your personal information, please contact us via email at compliance@bloomgrowth.com or via phone through the phone numbers provided in our "HOW TO CONTACT US" section below. If you are not satisfied with our response to your privacy concerns, you may also contact the Office of the Privacy Commissioner of Canada by telephone at (800) 282-1376.

13. ACCESSIBILITY

We are committed to ensuring this Privacy Notice is accessible to individuals with disabilities. If you wish to access this Privacy Notice in an alternative format, please click here.

14. HOW TO CONTACT US

To contact us with questions or concerns about our privacy policies or practices you may reach us through the following methods:

Email:
compliance@bloomgrowth.com

Call:
Toll free: (855) 647-6869
Local: (402) 378-9545

Mail:
Attn: Chief Privacy Compliance Officer
1201 Infinity Court
Lincoln, NE 68512