

Privacy Policy

Last updated: September 17, 2024

Please read these Privacy Policy carefully before using the website <u>https://sereda.ai/</u> ("Website"). These Privacy Policy are an agreement concluded between you ("You", "Your", "User") and us – company "sereda.ai" (also "Company", "We", "Us") and is a part of and to be read in conjunction with the sereda.ai Terms of Use ("Terms") which governs your access to our Website.

Company "sereda.ai" is referred to as:

Sereda.ai OÜ

Legal address: Harju maakond, Tallinn, Lasnamäe linnaosa, Lõõtsa tn 2a, Estonia, 11415

Registry code: 16797992

VAT: EE102646841

Representative of the company in Ukraine: Individual Entrepreneur Lukan Mykhailo Mykolayovych EDRPOU: 3256004196 Legal address: 10 Lisna St., Kobaki village, Kosiv district, Ivano-Frankivsk region, 78660, Ukraine Extract of state registration dated 03.02.2021 Nº200111000000010508

This Privacy Policy sets out the types of personal data that we hold on you, how we collect and process such data, how long we keep it, and other relevant information about your personal data being processed in connection with your access to and use of the Website. Personal data or personal information means any information directly or indirectly identifies you as an individual. In this Privacy Policy we use "personal data" and "personal information" as synonyms.



We process personal data in accordance with this Privacy Policy and we endeavor to comply with the applicable data protection legislation. If you have any questions regarding processing of your personal data, do not hesitate to contact us via the contact details provided below.

IF YOU DO NOT AGREE WITH ANY PART OF THIS PRIVACY POLICY OR OUR TERMS OF USE, THEN PLEASE DO NOT USE ANY OF THE WEBSITE.

Personal Information

Personal information as used in this Privacy Policy is equivalent to "personal data" as defined in the <u>European Union General Data Protection Regulation</u> (GDPR).

Warranty

You warrant that collection and use of any personal information or data you provide while using the Website complies with all applicable data protection laws, rules, and regulations.

High Level Summary About Personal Data

Users have the right to familiarize themselves with the privacy methods and tools used to protect their data, including those specified in the privacy policy.

Data We May Collect

- contact information such as your email address
- name of your company, registration code, name and last name of authorized person, the number of employees
- information required to comply with anti-money laundering (AML) laws and know-your-customer (KYC) requirements (such as your first name, last name, nationality, date of birth and gender, registered address, security address)



- non-identifiable data, such as public on-chain data, and limited off-chain data like device type, browser version, etc. This is to help drive production vision, not track users
- transaction data, bank details and your funds that may be related to the data we collect but are beyond our control
- information from localStorage and other tracking technologies. We and our third-party services providers may access and collect information from localStorage, mobile deviceID, cookies, web beacons, and other similar technologies to provide and personalize the services and features of the services for you across sessions. Information we collect from these technologies may include things such as browser type, referring/exit pages, operating system, device or browser language, and other device information.

Further Information:

- correspondence. We will receive any communications and information you provide directly to us via email <u>support@sereda.ai</u> or when you participate in any of our marketing questionnaires.
- survey or usability information. If you participate in a survey or usability study with us, we will record any biographical information you directly provide to us (identity information, such as your country of birth, nationality, place of birth, employer and occupation), the responses you provide to us, and your interactions with the Website.

We may also collect certain data if you reach us via (a) the contact details indicated in this Privacy Policy or on the Website, or (b) request or communication system that may be available on the Website from time to time. In this case, or any other data requested by us or data that you choose to provide us with.

Storage Of Your Data. You can delete your project at any time via the "Delete project" button in the project settings section. We can store your project and



related data for up to 90 (ninety) days after stopping payment for some subscription basis, and also for those who activated a trial subscription and did not switch to paid subscription.

You shall also know that We use a third party to store your data. We use the efficient capabilities of the Google Cloud Platform ("GCP") server to store all personal data and for information processing.

And You can also learn how GCP keeps your personal data private by link <u>https://cloud.google.com/security/compliance/offerings/</u>. We are not responsible to You for the loss and/or illegal use of Your personal data if this event occurred through the fault of GCP unless expressly stated otherwise in our Terms or their applicable law.

Google Analytics. When you access and use the Website, certain data may be collected automatically via the Google Analytics solution ("Analytical Data"). The information gathered by Google Analytics includes the following: (1) IP address, (2) the type of device used, (3) the device operating system, (4) the browser used. After collecting the personal data, Google Analytics creates reports about the use of the Website, which contain the aggregated information where we do not see any data pertaining to a particular person. In other words, we cannot identify you from the other visitors of the Website. Please note that according to <u>Google Analytics documentation</u>, the IP address is anonymized (masked), so neither we nor Google can identify the IP address of a particular visitor. In addition to the above, with Google Analytics we collect certain information regarding the use of the Website, for instance, when you clicked a certain button or made some input. This information is also aggregated and we cannot identify your actions from the actions of other Website visitors.

How We Use and Share The Data

We do not sell or rent out your data. However, we may share your personal data in accordance with this Privacy Policy, applicable legislation, or with your consent, in each case for the purposes of and if it is reasonably necessary:



- to provide you with access to the Website
- develop new products, services, features, and communicate with you, either directly or through one of our partners, including for customer service, to provide you with updates and other information relating to the Website
- send you emails from us about how you use the Service and interact with us
- for compliance with the applicable laws and regulations
- for our legitimate interest to maintain, improve and develop the Website
- marketing information.

Please note that if we transfer any part of your personal data to third parties, we will ensure that such transfer is protected by appropriate legal, organizational and technical measures, including the conclusion of data processing agreements and the use of encryption technologies to ensure the confidentiality and security of the data.

Your personal information may be is shared with these recipients:

- our affiliates, a controlling person, controlled by, or under the same control with us
- analytical solution providers
- marketing team
- support team
- legal team
- payment provider
- customer service software



- hosting service provider
- email delivery service provider
- government authorities, if it is necessary to comply with our legal obligations;
- another legal entity if we sell or otherwise transfer the Website or its part; and other third-party solutions, which may be from time to time integrated into the Website.

Access & Disclosure

Except as described in these Policy or our Terms: (i) we may access, preserve, or share any of your information when we believe in good faith that such sharing is reasonably necessary to investigate, prevent, or take action regarding possible illegal activities or to comply with legal process (e.g. a subpoena or other legal process); and (ii) we may also share your information in situations involving potential threats to the physical safety of any person, violations of our Privacy Policy, Terms of Use, or any other of our user agreements or terms in effect; or to respond to the claims of violation of the rights of third parties and/or to protect the rights, property and safety of our company, Website, our employees, users, or the public. This may involve the sharing of your information with law enforcement, government agencies, courts, and/or other organizations.

Your Responsibility

You shall be responsible for data that you provide or use in respect of our Website. You are solely responsible for determining the suitability of use of the Website for your business or organization and complying with any regulations, laws, or conventions applicable to the data you provide and your use of our site.



Partners. Third-Party Links

Some of the advertisers or partners on our Website may use cookies and web beacons. Each of our advertising partners has their own Privacy Policy for their policies on user data. We may integrate technologies operated or controlled by other parties into parts of the Services. For example, the Services may include links that hyperlink to websites, platforms, and other services not operated or controlled by us. Please note that when you interact with these other parties, including when you leave the Site, those parties may independently collect information about you and solicit information from you. You can learn more about how those parties collect and use your data by consulting their privacy policies and other terms.

Third-party ad servers or ad networks use technologies like cookies, JavaScript, or Web Beacons that are used in their respective advertisements and links that appear on the Website, which are sent directly to users' browsers. They automatically receive your IP address when this occurs. These technologies are used to measure the effectiveness of their advertising campaigns and/or to personalize the advertising content that you see on websites. Note that we have no access to or control over these cookies that are used by third-party advertisers.

Cookies

We use services provided by Google and other third parties that use tracking technology such as cookies, deviceID, and localStorage, to collect information about your use of the Services and our interactions with you. You can opt out of having your online activity and device data collected through these third-party services, including by:

 blocking cookies in your browser by following the instructions in your browser settings. For more information about cookies, including how to see the cookies on your device, manage them, and delete them, visit www.allaboutcookies.org.



- blocking or limiting the use of your advertising ID on your mobile device through the device settings.
- using privacy plug-ins or browsers. Certain browsers and browser extensions can be configured to block third-party cookies and trackers.

the Website Using opt-out provided by Google at https://adssettings.google.com. You can learn more about how Google uses your information bv reviewing Google's privacy policy at https://policies.google.com/privacy. To our knowledge, the data collected via Google Analytics is not anonymized (with the exception of the IP address) and will be transmitted to, processed and stored by Google in the United States. You can learn more about how Google processes personal data in Google's privacy policy.

Note that competent US state authorities may have access to the personal data collected via Google Analytics.

Security

We implement and maintain reasonable administrative, physical, and technical security safeguards to help protect data from loss, theft, misuse, unauthorized access, disclosure, alteration, and destruction. Nevertheless, transmission via the internet is not completely secure and we cannot guarantee the security of information about you.

Children personal data

The Website is not intended for the use of children (under 18 years old or older, if the country of your residence determines a higher age restriction). We do not knowingly market to, or solicit data from children. We do not knowingly process, collect, or use personal data of children. If we become aware that a child has provided us with personal information, we will use commercially reasonable efforts to delete such information from our database within a reasonable timeframe. If you are the parent or legal



guardian of a child and believe that we have collected personal information from your child, please contact us.

Regulations for European Union and Others Subjects

Your rights under the General Data Protection Regulations ("GDPR") include the right to (i) request access and obtain a copy of your personal data, (ii) request rectification or erasure of your personal data, (iii) object to or restrict the processing of your personal data; and (iv) request portability of your personal data. Additionally, you may withdraw your consent to our collection at any time. Nevertheless, we cannot edit or delete information such as your transaction data, bank details and your funds that may be related to the data we collect but are beyond our control.

For California Resident

If you are a resident of California (a "Consumer" as defined by the the California Consumer Privacy Act "CCPA"), this section of the Privacy Policy to you.

The Right to Opt-Out of Sales/Sharing of Personal Information. Consumers have the right to opt out of "sales" of their personal information or "sharing" of their personal information for cross-context behavioral advertising purposes under the CCPA. According to our Privacy Policy we may allow third-party advertising and marketing technologies and parties that support our advertising and marketing efforts (e.g., ad networks, ad measurement services, advertising analytics providers, remarketing providers, etc.) on our Website that use cookies and similar technologies to deliver relevant and targeted content and advertising to you on the Website and other websites you visit and applications you use. This type of information collection and disclosure can be considered to be a "sale" or "sharing" for cross-context behavioral advertising purposes under the CCPA.

We do not knowingly sell the personal information of minors under 16 years of age without legally-required affirmative authorization.



If you would like to exercise your right to opt-out under the CCPA, please write to us <u>support@sereda.ai</u>. If you have a legally-recognized browser-based opt-out preference signal turned on via your device browser, we recognize such preference in accordance with applicable law.

Other Rights. Consumers have other rights with respect to their Personal Information under the CCPA. This includes the right to request that we:

- provide you the categories of personal information we have collected or disclosed about you in the last 12 months; the categories of sources of such information; the business or commercial purpose for collecting or selling your personal information; and the categories of third parties with whom we shared personal information.
- provide access to and/or a copy of specific pieces of information we hold about you.
- delete certain information we have about you.
- correct inaccurate personal information we have about you.

We will not deny, charge different prices for, or provide a different level of quality of goods or services with respect to Consumers who choose to exercise their CCPA rights.

Consumers may submit requests to access, delete, or correct their personal information using any of the following methods:

- access and review personal information associated with your account through settings on the Website
- contact us by <u>support@sereda.ai</u>.

Certain personal information may be exempt from such requests under applicable law. In addition, we need certain types of personal information so that we can provide the product and Services to you. If you ask us to delete it, you may no longer be able to access or use our product and Services.



Authorized Person. Consumers may designate an authorized person to make CCPA requests on their behalf. For Consumers who do so, we will take steps to verify both the identity of the consumer seeking to exercise their rights and to verify that the consumer's authorized person has been authorized by them to make a request on their behalf by requesting a signed written authorization or a copy of a power of attorney.

List Of Third Parties. California residents may ask for a list of third parties that have received your personal information for direct marketing purposes during the previous calendar year. This list also contains the types of personal information shared. We provide this list at no cost. If you are a California resident and would like to request this information, please contact us via the support@sereda.ai.

How long We Process Your Data

We store your data only for as long as is necessary to fulfill the purposes for which it was collected or to comply with legal requirements.

Specific data storage periods include:

Your projects are stored for up to ninety (90) days after you stop paying or end your trial subscription, unless you upgrade to a paid subscription.

After the 90-day period, your data will be securely deleted.

Change of the Privacy Policy

We reserve the right to change these Privacy Policy at any time in accordance. If We make changes to these Privacy Policy, We undertake to publish the updated Privacy Policy in the website of Website and indicate the date of the "Last updated" at the beginning of these Policy. If You do not agree with the amended Policy, You may immediately terminate the Agreement with Us by ceasing to use our Website. If you continue to use our Website, these Privacy Policy will go into effect. Please check this page periodically to make sure you agree with the changes.



Our contact information

To exercise any of your rights under the GDPR, please contact us at <u>support@sereda.ai</u>. We may require additional information from you to process your request. Please note that we may retain information as necessary to fulfill the purpose for which it was collected and may continue to do so even after a data subject request in accordance with our legitimate interests, including to comply with our legal obligations, resolve disputes, prevent fraud, and enforce our agreements.

We hope these Privacy Policy helps You to understand how our Website works. If you have any questions regarding our Website, please email us <u>support@sereda.ai</u>.