

Privacy Policy

Last updated: April 2025

This is the Privacy Policy of cyberly.ai. The data controller is Cyberly Inc., a company duly incorporated under the Laws of Delaware, having its registered office at 131 Continental Drive, Suite 301, Newark 19713, registered in the Delaware Department of State: Division of Corporations under the number: 10012600.

In this document cyberly.ai is referred to as "we", "us", or "our". We are committed to protecting your privacy. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you use our website www.cyberly.ai including its subpages (the "Site") and Services referred to in Terms of Service (<https://cyberly.ai/terms>).

We have developed this policy in order for you to understand how we collect, use, communicate and make use of personal information. The following outlines our privacy policy.

Similar to other commercial websites, our website utilizes a standard technology called 'cookies' (see explanation below for more information) and server logs to collect information about how our site is used. Information gathered through cookies and server logs may include the date and time of visits, the pages viewed, time spent at our site, and the websites visited just before and just after our own, as well as your IP address.

We designated a person pursuant to Article 27 of GDPR, who represents us with regard to obligations under GDPR: Cyberly Sp. z o.o.

1. Introduction

This is our policy about information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on personal information.

The Site uses an application that allows for managing consent to make it easier for you to manage your preferences regarding cookies and other tools. You can use this application to change cookie settings, including:

- 1) express and withdraw consent to the use of optional cookies;
- 2) change previously selected settings.

We take seriously the protection of your privacy and confidentiality. We understand that all visitors to our website are entitled to know that their personal information will not be used for any purpose unintended by them, and will not accidentally fall into the hands of a third party.

We undertake to preserve the confidentiality of all information you provide to us.

The law requires us to tell you about your rights and our obligations to you in regards to the processing and control of your personal information.

Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

2. Information We Collect

We collect the following types of information unique to you:

- Personal information: Email address, name, phone number, and any other information you provide while interacting with us. We may collect personal information directly from you as a data subject or through third party.
- Usage data: Information on how you use our website and services.

We may also collect anonymous demographic information, which is not unique to you.

We may gather additional personal or non-personal information in the future. We encourage you to review the privacy statements of websites you choose to link to from us so that you can understand how those websites collect, use and share your information. We are not responsible for the privacy statements or other content on websites outside of the Site.

3. How We Use Your Information

In connection with the provision of the Site, we process the personal information:

- 1) for providing the Site - the legal basis for processing is the necessity of processing to perform the contract (Article 6, paragraph 1, letter "b" of the GDPR) or, if the contract has been concluded between us and the entity on whose behalf you act, the legal basis for processing is the legitimate interest pursued by us consisting in the performance of the above mentioned contract by us (Article 6, paragraph 1, letter "f" of the GDPR);
- 2) for analytical purposes - the legal basis for processing is your consent to the use of optional cookies (Article 6, paragraph 1, letter "a" of the GDPR);
- 3) for advertising purposes - the legal basis for processing is your consent to the use of optional cookies (Article 6, paragraph 1, letter "a" of the GDPR);
- 4) for the purpose of communication and resolving the matters to which the correspondence addressed to us by you, including via the contact form – the legal basis for processing is the legitimate interest of us (Article 6, paragraph 1, letter "f" of the GDPR) consisting in conducting correspondence with you;
- 5) for direct marketing - the legal basis for processing is legitimate interests pursued by us, that is carrying our direct marketing (Article 6.1 letter "f" of GDPR).

In connection with the provision of the Services, your personal information are processed by us solely for the purpose of providing the Services – the legal basis for processing is the necessity of processing to perform the contract (Article 6, paragraph 1, letter "b" of the GDPR) or, if the contract has been concluded between us and the entity on whose behalf you act, the legal basis for processing is the legitimate legal interest pursued by us consisting in the performance of the aforementioned contract by us (Article 6, paragraph 1, letter "f" of the GDPR).

In connection with conducting online meetings, personal information are processed solely for the purpose of their organization - the legal basis for processing is the legitimate interest of ours (Article 6 paragraph 1 letter "f" of the GDPR) consisting in the will to conduct an online meeting with you, bypassing the need for physical presence in one place.

We use your personal information for direct marketing, e.g. to inform you about services and/or events which we feel may interest you, if you have assented to be contacted for such purposes.

In connection with the provision of the Site, providing the data referred to in point 1 above is a contractual obligation. Failure to provide the data will prevent us from providing the Site.

In connection with the provision of the Site, providing the data referred to in points 2-5 is voluntary. Failure to provide the data referred to in point 2 will prevent the Site from being tailored to the your needs; Failure to provide the data referred to in point 3 will prevent you from displaying advertisements tailored to you. Failure to provide the data referred to in point 4 will prevent you from responding to correspondence. Failure to provide the data referred to in point 5 will prevent you from receiving marketing offers.

In connection with the provision of the Services, providing the data is a contractual obligation. Failure to provide the data will prevent us from performing the Services.

In connection with conducting online meetings, providing personal data by you is voluntary, but necessary to conduct the meeting.

4. Data Sharing and Disclosure

In connection with the use of the Site or providing Service your personal information may be disclosed to external entities, including in particular those providing IT services and IT tools for us, including Google Ireland Ltd. We may also disclose your information where required by law or to protect our rights.

We are subject to the law like everyone else. Sometimes, we must process your information in order to comply with a statutory obligation. For example, we may be required to give information to legal authorities if they so request or if they have the proper authorization such as a search warrant or court order. This may include your personal information.

We can transfer personal information outside the EEA. We transfer personal information outside the EEA only when it is necessary to ensure an adequate level of protection, primarily through:

- 1) cooperation with entities processing personal information in countries for which an appropriate decision of the European Commission has been issued regarding the provision of an adequate level of personal data protection;
 - 2) use of standard contractual clauses issued by the European Commission.
- The indicated safeguards are made available at our registered office.

Our websites are hosted within both the European Union and the United States of America. We may also use outsourced services in countries outside the European Union from time to time in other aspects of our business. Accordingly, data obtained within the US or any other country could be processed outside the European Union. For example, some of the software our website uses may have been developed in the UK.

5. Data Security

We implement appropriate technical and organizational measures to protect your data. These measures include multi-factor authentication and limited access roles.

6. Your Data Protection Rights

Depending on your location, you may have certain rights regarding your personal information, including:

- The right to access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object

Where the legal basis for the processing of personal information is consent, you have the right to declare the withdrawal of any consent given at any time. The withdrawal of consent shall not affect the lawfulness of processing carried out on the basis of the consent before the withdrawal.

To exercise these rights, please contact us at legal@cyberly.ai.

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

You have the right to lodge a complaint with the applicable supervisory authority over personal data (DPA).

7. Children's Privacy

Our service is not intended for use by children under the age of 18.

8. CAN-SPAM Compliance

In compliance with the CAN-SPAM Act, all e-mail sent from our organization will clearly state who the e-mail is from and provide clear information on how to contact the sender. In addition, all e-mail messages will also contain concise information on how to remove yourself from our mailing list so that you receive no further e-mail communication from us.

9. Data Under EU GDPR Compliance

We respect and value the right to privacy. We are also consumers and know that it is our responsibility to build a company that protects consumer privacy. Our services are designed to protect privacy and personal data of consumers.

When providing Services, we are considered a “data processor” under the GDPR and our customers are primarily considered to be “data controllers”, and are responsible for meeting additional privacy or consent gathering requirements for their individual use case.

We may share your information, including personal information, as follows:

- 1) Affiliates. We may disclose the personal information we collect to our affiliates or subsidiaries; however, if we do so, their use and disclosure of such information will be subject to this Privacy Policy.
- 2) Service Providers. We may disclose the personal information we collect to third party vendors, service providers, contractors or agents who perform functions on our behalf.
- 3) In Response to Legal Process. We also may disclose the personal information we collect from in order to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a court order or a subpoena.
- 4) To Protect Us and Others. We also may disclose the personal information we collect where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our Terms of Service or this Policy, or as evidence in litigation in which we are involved.

Complaints regarding content on our Site

If you complain about any of the content on our website, we shall investigate your complaint.

If we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate.

If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

You may direct any complaints to us by email. Our address is legal@cyberly.ai.

If a dispute is not settled, then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.

Based on data, we will not make automated decisions, including decisions resulting from profiling.

If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office.

Direct marketing

If you have granted appropriate consent for sending direct marketing and we're sending it to you, we provide the opportunity to opt-out of receiving communications from us and our partners by reading the unsubscribe instructions located at the bottom of any e-mail they receive from us at any time.

We respect your privacy and give you an opportunity to opt-out of receiving announcements of certain information. Users may opt-out of receiving any or all communications from us by contacting us at legal@cyberly.ai.

10. Sending a message to our support team

We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high quality service.

11. Storage

Our system does not store any content that could potentially identify an individual. We have built our platform to aggregate and analyze data collected in real-time, without any biometric being saved. We provide this service to its customers and partners in countries across the world.

12. Intellectual Property Rights

All copyrights, trademarks, patents and other intellectual property rights in and on our website and all content and software located on the site shall remain the sole property of or its licensors. The use of our trademarks, content and intellectual property is forbidden without the express written consent from.

You must not:

- Republish material from our website without prior written consent.
- Sell or rent material from our website.
- Reproduce, duplicate, create derivative, copy or otherwise exploit material on our website for any purpose.
- Redistribute any content from our website, including onto another website.

13. Application

Data collected and analyzed is being used for a variety of applications such as audience measurement and aggregated insights.

14. Complaining

When we receive a complaint, we record all the information you have given to us. We use that information to resolve your complaint. If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is. We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

15. Anonymity

We also collect and analyze anonymous data. In this case we cannot, and do not personally identify individuals, at any time, period.

16. Acceptable Use

You agree to use our website only for lawful purposes and in a way that does not infringe the rights of, restrict or inhibit anyone else's use and enjoyment of the website. Prohibited behavior includes harassing or causing distress or inconvenience to any other user, transmitting obscene or offensive content or disrupting the normal flow of dialogue within our website.

You must not use our website to send unsolicited commercial communications. You must not use the content on our website for any marketing related purpose without our express written consent.

17. Restricted access

We may in the future need to restrict access to parts (or all) of our Site and reserve full rights to do so. If, at any point, we provide you with a username and password for you to access restricted areas of our Site, you must ensure that both your username and password are kept confidential.

18. Affiliates and Business Partner Information

This is information given to us by you in your capacity as an affiliate of us or as a business partner. It allows us to recognize visitors that you have referred to us, and to credit to you commission due for such referrals. It also includes information that allows us to transfer commission to you. The Information Is Not Used for Any Other Purpose. We undertake to preserve the confidentiality of the information and of the terms of our relationship. We expect any affiliate or partner to agree to reciprocate this policy.

19. Cookies Policy under GDPR compliance

The Site uses cookies. They are placed by software that operates on our servers, and by software operated by third parties whose services we use.

When you first visit our website, we ask you whether you wish us to use cookies and which ones. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose. If you choose not to use cookies or you prevent their use through your browser settings, you will not be able to use all the functionality of our website.

As mentioned above we use a consent management application to make it easier for you to manage their preferences regarding cookies and other tools.

You can check in the browser which cookies are installed on the device and delete them individually or all at once.

- 1) Google Chrome browser: Settings > Advanced > Privacy and security > Content settings > Cookies > All cookies and site data (select one of the options).
- 2) Apple Safari browser: Preferences > Privacy > Cookies and site data (select one of the options).
- 3) Mozilla Firefox browser: Tools > Options > Privacy and security > History > Delete individual cookies.

Cookies we use are divided into the following categories:

TYPE	DESCRIPTION
Necessary cookies	Necessary cookies are installed to ensure you can access to the Site and its basic functions, so they do not require your consent. Without them, we would not be able to provide the Site.
Optional cookies	1) Analytical – allow checking the number of visits and traffic sources on the Site. They help identify which pages are more or less popular and understand how users navigate the site, which helps us improve Site performance. 2) Advertising – used to deliver ads tailored to your interests and preferences. Based on these cookies and activity on other sites, a profile of the User's interests is built.

Cookies we use are stored as follows:

TYPE	DESCRIPTION
Session cookies	Some cookies are temporary and stored until logout, leaving the page, or closing the web browser. These help analyze web traffic, identify and solve technical problems, and make navigating the Site easier.
Persistent cookies	“Persistent” cookies are stored for a defined period specified in their parameters or until deleted by you. They help us to remember you're your settings and preferences to make future visits more convenient and content more personalized.

When using the Site, you may receive cookies from third parties cooperating with us, including analytical service providers and advertising partners.

We engage third party service providers in particular in the scope related to the provision of Services available via the Site and with analytics, advertising or measurement of advertising campaign results, including the following:

- Calendly – a service provided by Calendly LLC (USA) to arrange calls and appointments. More information on the Calendly tool is available at: <https://calendly.com/privacy>
- Google Ads – a service provided by Google Ireland Limited (Ireland) that allows our services to be presented within Google's search engine and on websites that are part of Google's advertising network. A user entering certain search terms may be shown advertising correlated to the search term entered. As part of Google Ads, we have the ability to analyse the advertisements published on Google's websites, which allows our offers to be better tailored. After clicking on a banner ad published by Google, cookies are stored on the User's device. More information on the Google Ads tool is available at: <https://support.google.com/adspolicy/answer/54818?hl=en-GB>
- Google Analytics – a service provided by Google Ireland Limited (Ireland) to analyse the Site's traffic and browsing activities. The service is used in particular for statistical purposes to see how often individual pages are visited. We also use this data to optimise and develop the Site. More information on the Google Analytics tool is available at: <https://marketingplatform.google.com/about/analytics/terms/us/>
- Google reCAPTCHA – a service provided by Google Ireland Limited (Ireland) to recognise artificial traffic on websites and to protect against, among other things, activities undertaken by web bots;
- Google Tag Manager – a service provided by Google Ireland Limited (Ireland) for the purposes of Google Analytics and the integration of additional marketing services. The exclusive use of Google Tag Manager does not involve the collection of personal information. This tool enables the operation of tags (tagging), which can collect data under certain circumstances. Google Tag Manager does not use this data. If the saving option has been deactivated at domain or cookie level, this will apply to all tracking tags implemented via

Google Tag Manager. More information on the Google Tag Manager tool is available at:

<https://marketingplatform.google.com/about/analytics/tag-manager/use-policy/>

- Mailgun – a service provided by Sinch AB (Sweden) for the purpose of sending e-mails. More information on the Sendgrid tool is available at:
<https://www.mailgun.com/legal/privacy-policy/>;
- Sendgrid – a service provided by Twilio Inc. (USA) for the purpose of sending e-mails. More information on the Sendgrid tool is available at:
<https://sendgrid.com/en-us/resource/general-data-protection-regulation-2/>
- Facebook plug-ins – plug-ins linked to Facebook. This means that code referring to this service is placed on the pages. When visiting the our Facebook profile, the User goes to Facebook, where the rules set by Facebook apply. More information on the Facebook plug-ins is available at:
<https://facebook.com/about/privacy/>.

To provide website visitors the ability to prevent their data from being used by Google Analytics, we have developed the Google Analytics opt-out browser add-on for the Google Analytics JavaScript (ga.js, analytics.js, dc.js).

If you want to opt-out, download and install the add-on for your web browser. The Google Analytics opt-out add-on is designed to be compatible with Chrome, Internet Explorer 11, Safari, Firefox and Opera. In order to function, the opt-out add-on must be able to load and execute properly on your browser. For Internet Explorer, 3rd-party cookies must be enabled.

The Site might allow you to post information with a view to that information being read, copied, downloaded, or used by other people.

Examples include:

- posting a message our forum
- tagging an image
- clicking on an icon next to another visitor's message to convey your agreement, disagreement or thanks

In posting personal information, it is up to you to satisfy yourself about the privacy level of every person who might use it.

We use the Stripe external payment system. We do not store any personal information or financial information in connection with the use of Stripe, including such as payment card numbers. All this information is transmitted by you directly to Stripe. More information on Stripe is available at: <https://stripe.com/nz/privacy>.

20. THIRD PARTY ADVERTISING ON OUR WEBSITE

Third parties may advertise on our website. In doing so, if you grant appropriate consent for those parties, their agents or other companies working for them may use technology that

automatically collects information about you when their advertisement is displayed on our website.

They may also use other technology such as cookies or JavaScript to personalize the content of, and to measure the performance of their adverts.

We do not have control over these technologies or the data that these parties obtain.

Accordingly, this privacy notice does not cover the information practices of these third parties.

21. OUR USE OF TRACKING MECHANISMS

Provided you grant appropriate consent, we and our third party service providers use tracking mechanisms mentioned in the section above to track information about use of our Site or Services. We may combine this information with other information we collect from you on our Site (and our third party service providers may do so on our behalf). Currently, our website does not recognize browser “do-not-track” requests.

22. ENCRYPTION OF DATA SENT BETWEEN US

The Site use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us.

Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser’s URL bar or toolbar.

23. DURATION OF THE PROCESSING DATA

1. In the case of cookies, personal information will be processed in accordance with the storage period of the given cookie file (see section 19 above of this Privacy Policy).
2. In the case of the Services and in connection with the provision of the Site, personal information will be processed for the period in which the aforementioned services are provided and after their provision has completed, but only if it is permitted or required under applicable law, e.g. processing for statistical, billing or claim purposes.
3. In cases other than those indicated in sections 1-2 above, personal information will be processed for the period necessary to establish, pursue or defend claims.

24. DISCLAIMER AND LIMITATION OF LIABILITY

We make no representations, warranties, or assurances as to the accuracy, currency or completeness of the content contain on this website or any sites linked to this site.

ALL THE MATERIALS ON THIS SITE ARE PROVIDED ‘AS IS’ WITHOUT ANY EXPRESS OR IMPLIED WARRANTY OF ANY KIND, INCLUDING WARRANTIES OF MERCHANTABILITY, NONINFRINGEMENT OF INTELLECTUAL PROPERTY OR FITNESS FOR ANY PARTICULAR PURPOSE. IN NO EVENT SHALL WE OR OUR AGENTS OR ASSOCIATES BE LIABLE FOR ANY DAMAGES WHATSOEVER (INCLUDING, WITHOUT LIMITATION, DAMAGES FOR LOSS OF PROFITS, BUSINESS INTERRUPTION, LOSS OF INFORMATION, INJURY OR DEATH) ARISING OUT OF

THE USE OF OR INABILITY TO USE THE MATERIALS, EVEN IF HAS BEEN ADVISED OF THE POSSIBILITY OF SUCH LOSS OR DAMAGES. THIS CLAUSE DOES NOT APPLY TO IF YOU ARE EU CONSUMER.

25. SECURITY OF YOUR PERSONAL INFORMATION

Email is not recognized as a secure medium of communication. For this reason, we request that you do not send private information to us by email. However, doing so is allowed, but at your own risk. Some of the information you may enter on our website may be transmitted securely via a secure medium known as Secure Sockets Layer, or SSL. Credit Card information and other sensitive information are never transmitted via email. If you grant consent, we may use software programs to create summary statistics, which are used for such purposes as assessing the number of visitors to the different sections of our site, what information is of most and least interest, determining technical design specifications, and identifying system performance or problem areas. For Site security purposes and to ensure that this service remains available to all users, uses software programs to monitor network traffic to identify unauthorized attempts to upload or change information, or otherwise cause damage.

We secure your personal information from unauthorized access, use, or disclosure. We use the following methods for this purpose: SSL Protocol

When personal information (such as a credit card number) is transmitted to other websites, it is protected through the use of encryption, such as the Secure Sockets Layer (SSL) protocol.

We have deployed reasonable security protocols that protect our products and services from being hacked or tampered with by 3rd parties. We encrypt our connections with some of the same technology used by banks to protect our information.

26. COMPLIANCE WITH THE LAW

Our privacy policy has been compiled so as to comply with the law and every country or legal jurisdiction in which we aim to do business including under the GDPR.

Your Data Protection Rights under the California Privacy Protection Act (CalOPPA)

CalOPPA is the first state law in the nation to require commercial websites and online services to post a privacy policy. The law's reach stretches well beyond California to require a person or company in the United States (and conceivable the world) that operates websites collecting personally identifiable information from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals with whom it is being shared, and to comply with this policy. – See more at: <https://consumercal.org/about-cfc/cfc-education-foundation/california-online-privacy-protection-act-caloppa-3/>

According to CalOPPA we agree to the following:

- users can visit our site anonymously;

- our Privacy Policy link includes the word “Privacy”, and can easily be found on the page specified above on the home page of our website;
- users will be notified of any privacy policy changes on our Privacy Policy page;
- users are able to change their personal information by emailing us at legal@cyberly.ai

Our Policy on “Do Not Track” Signals:

While you may disable the usage of cookies through your browser settings, the Site currently does not respond to a "Do Not Track" signal in the HTTP header from your browser at this time.

Your Data Protection Rights under the California Consumer Privacy Act (CCPA)

If you are a California resident, you are entitled to learn what data we collect about you, ask to delete your data and not to sell (share) it. To exercise your data protection rights, you can make certain requests and ask us:

- What personal information we have about you. If you make this request, we will return to you:
 - o The categories of personal information we have collected about you.
 - o The categories of sources from which we collect your personal information.
 - o The business or commercial purpose for collecting or selling your personal information.
 - o The categories of third parties with whom we share personal information.
 - o The specific pieces of personal information we have collected about you.
 - o A list of categories of personal information that we have sold, along with the category of any other company we sold it to. If we have not sold your personal information, we will inform you of that fact.
 - o A list of categories of personal information that we have disclosed for a business purpose, along with the category of any other company we shared it with.

Please note, you are entitled to ask us to provide you with this information up to two times in a rolling twelve-month period. When you make this request, the information provided may be limited to the personal information we collected about you in the previous 12 months.

- To delete your personal information. If you make this request, we will delete the personal information we hold about you as of the date of your request from our records and direct any service providers to do the same. In some cases, deletion may be accomplished through de-identification of the information. If you choose to delete your personal information, you may not be able to use certain functions that require your personal information to operate.
- To stop selling your personal information. We do not sell or rent your personal information to any third parties for any purpose. You are the only owner of your personal information and can request disclosure or deletion at any time.

Please note, if you ask us to delete or stop selling your data, it may impact your experience with us, and you may not be able to participate in certain programs or membership services which

require the usage of your personal information to function. But in no circumstances, we will discriminate against you for exercising your rights.

To exercise your California data protection rights described above, please send your request(s) by one of the following means:

By email: legal@cyberly.ai

By visiting this page on our website: <https://cyberly.ai/>

Your data protection rights, described above, are covered by the CCPA, short for the California Consumer Privacy Act. To find out more, visit the official California Legislative Information website.

We will verify and respond to your request consistent with applicable law, taking into account the type and sensitivity of the Personal Information subject to the request. We may need to request additional Personal Information from you, such as email address, state of residency, or mailing address, in order to verify your identity and protect against fraudulent requests. If you maintain a password-protected account with us, we may verify your identity through our existing authentication practices for your account and require you to re-authenticate yourself before disclosing or deleting your Personal Information. If you make a Request to Delete, we may ask you to confirm your request before we delete your Personal Information.

You have the right to be free from unlawful discrimination for exercising your privacy rights. You have the right to be informed, at or before the point of collection, of the categories of personal information to be collected from you and the purposes for which that personal information will be used.

27. U.S. PRIVACY ADDENDUM FOR RESIDENTS OF CALIFORNIA, COLORADO, CONNECTICUT, UTAH, AND VIRGINIA

This U.S. Privacy Addendum supplements the above Privacy Notice and provides additional details regarding the categories of Personal Information that we collect, use, and disclose about residents of California, Colorado, Connecticut, Utah, and Virginia. This Addendum does not apply to processing of personal data under GDPR, including processing of personal data of EU citizens.

No Sale of Personal Information

We do not sell Personal Information, including sensitive personal information, in the preceding 12 months. Without limiting the foregoing, we do not sell or knowingly “share” for purposes of cross-context behavioral advertising Personal Information, including sensitive personal information, of minors under age 16.

Collection, Disclosure, and Sharing of Personal Information

The following chart details which categories of Personal Information we plan to collect, as well as the categories of Personal Information we have collected and disclosed for our operational business purposes in the preceding 12 months. The chart also details the categories of personal

information that we “share” for purposes of cross-context behavioral or targeted advertising, including in the preceding 12 months. We collect this Personal Information from you and your devices, as well as from our corporate affiliates, publicly available databases, other customers, credit agencies (as allowed by applicable laws), and social media sites.

Categories of Personal Information	Disclosed to Which Categories of Third Parties for Operational Business Purposes	Shared with Which Categories of Third Parties for Cross-Context Behavioral or Targeted Advertising	Processing Purposes (<i>see section above titled “How do we use your information?” for a detailed description of each Processing Purpose</i>)
Identifiers, such as name, contact information, IP address and other online identifiers	• Corporate affiliates • Third-party service providers, who assist us for example with payment processing, marketing and advertising, shipping, fraud prevention, rewards programs and information technology support; • Business partners, such as partner teams, venues, artists, and sports leagues, to provide our event services • Credit agencies, consistent with applicable law • Legal authorities • Stripe, to provide our services, facilitate your purchases and prevent fraud • Financial institutions with whom we partner to offer financial products to you • Other users as authorized by you or your use of our services	Ad networks; social media platforms	• Providing the functionality of the Services and fulfilling your requests • Communicating with you, providing you with our newsletter and/or other marketing materials, and facilitating social sharing • Analyzing personal information for business reporting and providing personalized services • Allowing you to participate in sweepstakes, contests or other promotions • Aggregating and/or anonymizing personal information

			● Accomplishing our business purposes ● Validating your transactions and keeping our Services safe, including complying with law and cooperating with legal and governmental authorities
Personal information, as defined in the California customer records law, such as name, government-issued ID number (e.g., your tax identification number when you register for an account with us), and financial information such as payment card number	● Corporate affiliates ● Third-party service providers, who assist us for example with payment processing, marketing and advertising, shipping, fraud prevention, rewards programs and information technology support; ● Credit agencies, consistent with applicable law ● Legal authorities ● Stripe, to provide our services, facilitate your purchases and prevent fraud ● Financial institutions with whom we partner to offer financial products to you	None	● Providing the functionality of the Services and fulfilling your requests ● Communicating with you, providing you with our newsletter and/or other marketing materials, and facilitating social sharing ● Analyzing personal information for business reporting and providing personalized services ● Allowing you to participate in sweepstakes, contests or other promotions ● Aggregating and/or anonymizing

			personal information ● Accomplishing our business purposes ● Validating your transactions and keeping our Services safe, including complying with law and cooperating with legal and governmental authorities
Characteristics of protected classifications under California or federal law, such as age and gender	● Corporate affiliates ● Third-party service providers, who assist us for example with payment processing, marketing and advertising, shipping, fraud prevention, rewards programs and information technology support; ● Business partners, such as partner teams, venues, artists, and sports leagues, to provide our event services ● Credit agencies, consistent with applicable law	None	● Providing the functionality of the Services and fulfilling your requests ● Communicating with you, providing you with our newsletter and/or other marketing materials, and facilitating social sharing ● Analyzing personal information for business reporting and providing personalized services ● Allowing you to participate in sweepstakes, contests or other promotions ● Aggregating and/or

			anonymizing personal information ● Accomplishing our business purposes ● Validating your transactions and keeping our Services safe, including complying with law and cooperating with legal and governmental authorities
Commercial information, such as transaction information and purchase history	● Corporate affiliates ● Third-party service providers, who assist us for example with payment processing, marketing and advertising, shipping, fraud prevention, rewards programs and information technology support; ● Business partners, such as partner teams, venues, artists, and sports leagues, to provide our event services ● Credit agencies, consistent with applicable law Legal authorities ● Stripe, to provide our services, facilitate your purchases and prevent fraud ● Financial institutions with whom we partner to offer financial products to you	Ad networks; social media platforms	● Providing the functionality of the Services and fulfilling your requests ● Communicating with you, providing you with our newsletter and/or other marketing materials, and facilitating social sharing ● Analyzing personal information for business reporting and providing personalized services ● Allowing you to participate in sweepstakes, contests or other promotions

	• Other users as authorized by you or your use of our services		• Aggregating and/or anonymizing personal information • Accomplishing our business purposes • Validating your transactions and keeping our Services safe, including complying with law and cooperating with legal and governmental authorities
Internet or network activity information, such as browsing history and interactions with our website.	• Corporate affiliates • Third-party service providers, who assist us for example with payment processing, marketing and advertising, shipping, fraud prevention, rewards programs and information technology support; • Business partners, such as partner teams, venues, artists, and sports leagues, to provide our event services • Stripe, to provide our services, facilitate your purchases and prevent fraud	Ad networks; social media platforms	• Providing the functionality of the Services and fulfilling your requests • Communicating with you, providing you with our newsletter and/or other marketing materials, and facilitating social sharing • Analyzing personal information for business reporting and providing personalized services • Allowing you to participate in sweepstakes,

			contests or other promotions ● Aggregating and/or anonymizing personal information ● Accomplishing our business purposes ● Validating your transactions and keeping our Services safe, including complying with law and cooperating with legal and governmental authorities
Geolocation data, such as device location and approximate location derived from IP address.	● Corporate affiliates ● Third-party service providers, who assist us for example with payment processing, marketing and advertising, shipping, fraud prevention, rewards programs and information technology support;	Ad networks; social media platforms	● Providing the functionality of the Services and fulfilling your requests ● Communicating with you, providing you with our newsletter and/or other marketing materials, and facilitating social sharing ● Analyzing personal information for business reporting and providing personalized services ● Allowing you to participate in

			sweepstakes, contests or other promotions ● Aggregating and/or anonymizing personal information ● Accomplishing our business purposes ● Validating your transactions and keeping our Services safe, including complying with law and cooperating with legal and governmental authorities
Audio, electronic, visual, similar information, such as photographs and call recordings	● Corporate affiliates ● Third-party service providers, who assist us for example with payment processing, marketing and advertising, shipping, fraud prevention, rewards programs and information technology support; ● Other users as authorized by you or your use of our services	None	● Providing the functionality of the Services and fulfilling your requests ● Communicating with you, providing you with our newsletter and/or other marketing materials, and facilitating social sharing ● Analyzing personal information for business reporting and providing personalized services

			● Allowing you to participate in sweepstakes, contests or other promotions ● Aggregating and/or anonymizing personal information ● Accomplishing our business purposes ● Validating your transactions and keeping our Services safe, including complying with law and cooperating with legal and governmental authorities
Inferences drawn from any of the Personal Information listed above to create a profile about, for example, an individual's preferences and characteristics	● Corporate affiliates ● Third-party service providers, who assist us for example with payment processing, marketing and advertising, shipping, fraud prevention, rewards programs and information technology support;	Ad networks; social media platforms	● Providing the functionality of the Services and fulfilling your requests ● Communicating with you, providing you with our newsletter and/or other marketing materials, and facilitating social sharing ● Analyzing personal information for business reporting and providing

			personalized services • Allowing you to participate in sweepstakes, contests or other promotions • Aggregating and/or anonymizing personal information • Accomplishing our business purposes • Validating your transactions and keeping our Services safe, including complying with law and cooperating with legal and governmental authorities
Sensitive personal information • Personal information that reveals an individual's social security, driver's license, state identification card, or passport number; account log-in; precise geolocation	• Corporate affiliates • Third-party service providers, who assist us for example with payment processing, marketing and advertising, shipping, fraud prevention, rewards programs and information technology support;	None	Subject to your consent where required by applicable law, we collect, use, and disclose sensitive personal information only for those purposes permitted under applicable law, such as for purposes of performing services for our business, providing goods or services as requested by you, ensuring security and integrity, short term transient use such as displaying first party, non-personalized advertising, order

			processing and fulfillment, servicing accounts, providing customer service, verifying customer information, processing payments, providing financing, and activities relating to quality and safety control or product improvement.
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We collect, use, disclose, or share Personal Information to operate, manage, and maintain our business, to provide Site and Services, and to accomplish our business purposes and objectives, including, for example, to: develop, improve, repair, and maintain our products and services; personalize, advertise, and market our products and services; conduct research, analytics, and data analysis; maintain our facilities and infrastructure; undertake quality and safety assurance measures; conduct risk and security control and monitoring; detect and prevent fraud; perform identity verification; perform accounting, audit, and other internal functions, such as internal investigations; comply with law, legal process, and internal policies; maintain records; and exercise and defend legal claims. See the chart above for further detail.

If you are a Colorado, Virginia, or Connecticut consumer, and we refuse to take action on your request, you may appeal our refusal within a reasonable period after you have received notice of the refusal. You may file an appeal by contacting us via legal@cyberly.ai.

If an agent would like to make a request on your behalf as permitted under applicable law, the agent may use the submission methods noted on the Site. As part of our verification process, we may request that the agent provide, as applicable, proof concerning their status as an authorized agent. In addition, we may require that you verify your identity or confirm with us that you provided the agent permission to submit the request.

Where we maintain or use de-identified information, we will continue to maintain and use the de-identified information only in a de-identified fashion and will not attempt to re-identify the information.

28. Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page. The terms that apply to you are those posted here on our website on the day you use our Site. We advise you to print a copy for your records.

29. Contact Us

If you have any questions about this Privacy Policy, please contact us at legal@cyberly.ai.

