Altir Privacy Policy

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This Privacy Policy is designed to help you understand how Altir Industries, Inc. ("Altir," "we," "us," or "our") collects, uses, processes, and shares your personal information, and to help you understand and exercise your privacy rights.

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1. SCOPE TO THIS PRIVACY POLICY

This Privacy Policy applies to personal information processed by us, including on our websites, and other online or offline offerings, which we collectively call the "**Services**."

Changes to our Privacy Policy. We may revise this Privacy Policy from time to time in our sole discretion. If there are any material changes to this Privacy Policy, we will notify you as required by applicable law. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you continue to use our Services after the new Privacy Policy takes effect.

2. PERSONAL INFORMATION WE COLLECT

The categories of personal information we collect depend on how you interact with us, our Services, and the requirements of applicable law. We collect information that you provide to us, information we obtain automatically when you use our Services, and information from other sources such as third-party services and organizations, as described below.

A. Personal Information You Provide to Us Directly

We may collect personal information that you provide to us.

- Account Creation. We may collect personal information when you create an account, such as name, email address, address, phone numbers, and other similar information.
- **Purchases**. We may collect personal information and details associated with your purchases, including payment information. Any payments made via our Services are processed by third-party payment processors. We do not directly collect or store any payment card information entered through our Services, but we may receive information associated with your payment card information (for example, your billing details).
- Your Communications with Us. We may collect personal information, such as email address, phone number, or mailing address when you request information about our Services, register for our newsletter, request customer or technical support, or otherwise communicate with us.
- **Surveys**. We may contact you to participate in surveys. If you decide to participate, we may collect personal information from you in connection with the survey.
- Sweepstakes or Contests. We may collect personal information you provide for any sweepstakes or contests that we offer. In some jurisdictions, we are required to publicly share information of sweepstakes and contest winners.
- **Conferences, Trade Shows, and Other Events**. We may collect personal information from individuals when we attend or host conferences, trade shows, and other events.
- **Business Development and Strategic Partnerships**. We may collect personal information from individuals and third parties to assess and pursue potential business opportunities.
- Job Applications. We may post job openings and opportunities on our Services. If you respond to one of these postings, we may collect your personal information, such as your application, CV, cover letter, and/or any other information you provide to us.

B. Personal Information Collected Automatically

We may collect personal information automatically when you use our Services.

- Automatic Collection of Personal Information. We may collect certain information automatically when you use our Services, such as your Internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, browser or device information, location information (including approximate location derived from IP address), and Internet service provider. We may also automatically collect information regarding your use of our Services, such as pages that you visit before, during and after using our Services, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Services.
- Cookie Policy (and Other Technologies). We, as well as third parties that provide content, advertising, or other functionality on our Services, may use cookies, pixel tags, and other technologies ("Technologies") to automatically collect information through your use of our Services.

- o **Cookies**. Cookies are small text files placed in device browsers that store preferences and facilitate and enhance your experience.
- o **Pixel Tags/Web Beacons**. A pixel tag (also known as a web beacon) is a piece of code embedded in our Services that collects information about engagement on our Services. The use of a pixel tag allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted on, or forwarded.

Our uses of these Technologies fall into the following general categories:

- **Operationally Necessary**. This includes Technologies that allow you access to our Services, applications, and tools that are required to identify irregular website behavior, prevent fraudulent activity, improve security, or allow you to make use of our functionality;
- **Performance-Related**. We may use Technologies to assess the performance of our Services, including as part of our analytic practices to help us understand how individuals use our Services (*see Analytics below*);
- **Functionality-Related**. We may use Technologies that allow us to offer you enhanced functionality when accessing or using our Services. This may include identifying you when you sign into our Services or keeping track of your specified preferences, interests, or past items viewed;
- Advertising- or Targeting-Related. We may use first party or third-party Technologies to deliver content, including ads relevant to your interests, on our Services or on third-party digital properties.

See "<u>Your Privacy Choices and Rights</u>" below to understand your choices regarding these Technologies.

• Analytics. We may use Technologies and other third-party tools to process analytics information on our Services. These Technologies allow us to better understand how our digital Services are used and to continually improve and personalize our Services.

C. Personal Information Collected from Other Sources

Third-Party Services and Sources. We may obtain personal information about you from other sources, including through third-party services and organizations.

3. HOW WE USE YOUR PERSONAL INFORMATION

We use your personal information for a variety of business purposes, including to provide our Services, for administrative purposes, and to market our products and Services, as described below.

A. Provide Our Services

We use your information to fulfill our contract with you and provide you with our Services, such as:

• Managing your information and accounts;

- Providing access to certain areas, functionalities, and features of our Services;
- Answering requests for customer or technical support;
- Communicating with you about your account, activities on our Services, and policy changes;
- Processing your financial information and other payment methods for products or Services purchased;
- Processing applications if you apply for a job we post on our Services; and
- Allowing you to register for events.

B. Administrative Purposes

We use your information for various administrative purposes, such as:

- Pursuing our legitimate interests such as direct marketing, research and development (including marketing research), network and information security, and fraud prevention;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity;
- Measuring interest and engagement in our Services;
- Improving, upgrading, or enhancing our Services;
- Developing new products and services;
- Ensuring internal quality control and safety;
- Authenticating and verifying individual identities, including requests to exercise your rights under this Privacy Policy;
- Debugging to identify and repair errors with our Services;
- Auditing relating to interactions, transactions, and other compliance activities;
- Sharing personal information with third parties as needed to provide the Services;
- Enforcing our agreements and policies; and
- Carrying out activities that are required to comply with our legal obligations.

C. Marketing and Advertising our Products and Services

We may use personal information to tailor and provide you with content and advertisements. We may provide you with these materials as permitted by applicable law.

Some of the ways we market to you include email campaigns and custom audiences advertising.

If you have any questions about our marketing practices, you may contact us at any time as set forth in "<u>Contact Us</u>" below.

D. Other Purposes

We also use your personal information for other purposes as requested by you or as permitted by applicable law.

- With Your Consent. We may use personal information for other purposes that are clearly disclosed to you at the time you provide personal information or with your consent.
- **De-identified and Aggregated Information**. We may use personal information to create de-identified and/or aggregated information, such as demographic information, information about the device from which you access our Services, or other analyses we create.

4. HOW WE DISCLOSE YOUR PERSONAL INFORMATION

We disclose your personal information to third parties for a variety of business purposes, including to provide our Services, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

A. Disclosures to Provide our Services

The categories of third parties with whom we may share your personal information are described below.

- Service Providers. We may share your personal information with our third-party service providers and vendors that assist us with the provision of our Services. This includes service providers and vendors that provide us with IT support, hosting, payment processing, customer service, and related services.
- **Business Partners**. We may share your personal information with business partners to provide you with a product or service you have requested. We may also share your personal information with business partners with whom we jointly offer products or services.
- **APIs/SDKs**. We may use third-party application program interfaces ("**APIs**") and software development kits ("**SDKs**") as part of the functionality of our Services. SDKs typically collect your mobile device identifier and information related to your use of the Services. SDKs may allow third parties including analytics and advertising partners to collect your information for various purposes including to provide analytics services and personalized advertising. For more information about our use of APIs and SDKs, please contact us as set forth in "Contact Us" below.

B. Disclosures to Protect Us or Others

We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our, or others' rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

C. Disclosure in the Event of Merger, Sale, or Other Asset Transfers

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, your information may be sold or transferred as part of such a transaction, as permitted by law and/or contract.

5. YOUR PRIVACY CHOICES AND RIGHTS

Your Privacy Choices. The privacy choices you may have about your personal information are determined by applicable law and are described below.

• Email Communications. If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails regarding products or Services you have requested. We may also send you certain non-promotional communications regarding us and our Services, and you will not be able to opt out of those communications (for example, communications regarding our Services or updates to our Terms or this Privacy Policy).

- **"Do Not Track."** Do Not Track (**"DNT**") is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.
- **Cookies**. You may stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as your browser or device permits. However, if you adjust your preferences, our Services may not work properly. Please note that cookie-based opt-outs are not effective on mobile applications. However, you may opt-out of personalized advertisements on some mobile applications by following the instructions for <u>Android</u>, <u>iOS</u>, and <u>others</u>.

Please note you must separately opt out in each browser and on each device.

Your Privacy Rights. In accordance with applicable law, you may have the right to:

- Confirm Whether We Are Processing Your Personal Information (the right to know);
- Access to and Portability of Your Personal Information, including: (i) obtaining access to or a copy of your personal information; and (ii) receiving an electronic copy of personal information that you have provided to us, or asking us to send that information to another company in a structured, commonly used, and machine readable format (also known as the "right of data portability");
- **Request Correction** of your personal information where it is inaccurate or incomplete;
- **Request Correction** of your personal information where it is inaccurate or incomplete;
- **Request Deletion** of your personal information;
- Request to Opt-Out of Certain Processing Activities including, as applicable, if we process your personal information for "targeted advertising" (as "targeted advertising" is defined by applicable privacy laws), if we "sell" your personal information (as "sell" is defined by applicable privacy laws), or if we engage in "profiling" in furtherance of certain "decisions that produce legal or similarly significant effects" concerning you (as such terms are defined by applicable privacy laws);
- Request Restriction of or Object to our processing of your personal information;
- Withdraw your Consent to our processing of your personal information. Please note that your withdrawal will only take effect for future processing, and will not affect the lawfulness of processing before the withdrawal; and
- Appeal our Decision to decline to process your request.

If you would like to exercise any of these rights, please contact us as set forth in "<u>Contact Us</u>" below. We will process such requests in accordance with applicable laws.

If applicable laws grant you an appeal right and you would like to appeal our decision with respect to your request, you may do so by informing us of this and providing us with information supporting your appeal.

6. **RETENTION OF PERSONAL INFORMATION**

We store the personal information we collect as described in this Privacy Policy for as long as you use our Services, or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

To determine the appropriate retention period for personal information, we may consider applicable legal requirements, the amount, nature, and sensitivity of the personal information, certain risk factors, the purposes for which we process your personal information, and whether we can achieve those purposes through other means.

7. SUPPLEMENTAL NOTICE FOR CALIFORNIA RESIDENTS

California Shine the Light. The California "Shine the Light" law permits users who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed their personal information (if any) for their direct marketing purposes in the prior calendar year, as well as the type of personal information disclosed to those parties.

8. SUPPLEMENTAL NOTICE FOR NEVADA RESIDENTS

If you are a resident of Nevada, you have the right to opt-out of the sale of certain personal information to third parties who intend to license or sell that personal information. Please note that we do not currently sell your personal information as sales are defined in Nevada Revised Statutes Chapter 603A. If you have any questions, please contact us as set forth in <u>Contact Us</u> below.

9. CHILDREN'S INFORMATION

The Services are not directed to children under 18 (or other age as required by local law), and we do not knowingly collect personal information from children.

10. OTHER PROVISIONS

Third-Party Websites/Applications/Services. The Services may contain links to other websites/applications and other websites/applications may reference or link to our Services or the Services may allow you to interact with Third-Party Services. These third-party services are not controlled by us. We encourage our users to read the privacy policies of each website and application with which they interact. We do not endorse, screen, or approve, and are not responsible for the third party's actions or omissions, including but not limited to their privacy practices, content of such other websites or applications, and errors or bugs in their software. Providing personal information to third-party websites or applications is at your own risk.

11. CONTACT US

If you have any questions about our privacy practices or this Privacy Policy, or wish to exercise your rights as detailed in this Privacy Policy, please contact us at:

Altir Industries, Inc. info@altir.app