

# Neiro AI Privacy Policy

*Effective as of 14th of November, 2023*

## 1. Introduction

This Privacy Policy governs and explains how Mynalabs Inc. ("Neiro AI", "we", "us" or "our") collects, uses, and stores your personal information.

The information about you can be divided into personally identifiable and non-personally identifiable information depending on whether information can identify you as a specific person. Personally identifiable information shall be referred to as "personal data."

If you have any questions or concerns regarding your privacy, you can contact us at [contact@neiro.ai](mailto:contact@neiro.ai).

The following words and abbreviations shall have the meaning provided herein:

"personal data" means any information relating to an identified or identifiable natural person ("User"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

"processing" means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

"processor" means a natural or legal person, public authority, agency, or other body which processes personal data on behalf of Neiro AI.

"personal data breach" means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored, or otherwise processed.

## **2. Personal data that we process**

During your interaction with the Services or with us directly, we may process the following personal data:

- Identity data (such as first name, last name, username, or similar identifier)
- Contact data (such as billing address, email address, and telephone numbers)
- Financial data (such as bank account and payment card details)
- Transaction data (such as details of payments and services purchased)
- Commercial data (such as company name, business purpose, and requirements for video generation)
- Usage data (such as information about how our website, products, and services are used)
- Marketing data (such as marketing and communication preferences)
- Audio/Video data (such as content uploaded as a data source for video generation)
- Technical data (such as internet protocol (IP) address, login data, browser, time zone setting and location, and operating system used for access)
- Other information you choose to provide.

We may collect personal data when you interact with the Services, when you register and customize an account, or when you contact us.

## **3. Purposes for the processing of personal data**

We process your personal data for the following purposes:

- to provide you with access to our Services,
- to provide you with the Services you requested,
- to create and manage your account,
- to process payment for the paid Services,
- to provide you with customer support,
- to send you information about the Services,
- to send you advertising emails,
- to analyze and develop technical improvements to the Services,
- to comply with our legal obligations.

#### **4. Legal basis for data processing**

Depending on the type of personal data and the purpose for which it is processed, we process the personal data on the following legal basis:

- You have given us consent for data processing for a specific purpose,
- Processing is necessary for the performance of our obligations under the Agreements,
- Processing is necessary for compliance with legal obligations,
- Processing is necessary for the purpose of our legitimate interest.

We may process your email address to send you information about changes to the Services, introduce you to new Services, or provide general news about our Services. We have a legitimate interest in keeping you informed about the Services and promoting our new Services, which we believe might be interesting to you. You can unsubscribe from these emails at any time by following the unsubscribe link in the email. We will not use legitimate interest to send you advertising emails for any third-party services.

We may process your IP address and other technical data automatically when you access the Services. This is because we have a legitimate interest in ensuring the safety and integrity of our Services, and by collecting technical data, we can scan it and prevent malicious signs such as too many password failures, seeking exploits, and similar.

We may process information about how you use the Services and how you interact with the website through third-party analytics tools. We process this data under our legitimate interest in analyzing the performance of the Services and updating our Services. We aim to minimize the amount of personal data included in such information and to anonymise the data wherever possible. Session information is anonymised and used only for research purposes in order to improve and adapt our Services. Third-Party tools cannot connect the data about the session to a specific User.

We may process the content you provided to generate a video through Services for our internal research or to improve our Services or other Neuro AI technologies. We rely on our legitimate interest of improving the Services and developing new technologies. Such processing of your content is typically expected with Services that depend on constant research and development through the use.

## **5. General provisions**

Some Services will not be available to you if you do not provide requested personal data; for example, you cannot register for an account if you do not provide your name and email. In addition, different Services may require additional information that will be requested when requesting the specific Service.

We may keep records of any questions, complaints, or compliments made by you and the response, if any. Whenever you contact us, we shall collect any information which you choose to provide. We shall store and use this information only to respond to your inquiries.

We do not sell or rent personal information to any third-party. We use collected information for our internal and marketing purposes, as necessary by the nature of the Services, and only in accordance with this Privacy Policy. In some instances, we are obliged to comply with court orders and government requests and provide information or parts of it to authorized bodies.

We have implemented security procedures and measures to ensure appropriate protection of the personal data we process against any misuse, unauthorized access, disclosure, or modification.

We acknowledge that the safety of your personal data is one of the highest priorities, and therefore only authorized processors have access to your information. Although we take all appropriate measures in respect to keeping your personal data secure, you understand that no data security measures in the world can offer 100% protection. If we ever find or suspect a personal data breach, we will, without delay, within seventy-two (72) hours after becoming aware of it, notify the appropriate supervisory authority about the breach and Users where necessary.

## **6. Children's privacy**

Our Services are intended for a general audience and are not targeted at children under the age of 16 (“minors”). We do not knowingly collect or ask for information from minors and do not knowingly allow minors to use the Service.

## **7. Cookies and third-party services**

A cookie is a small piece of text used to store information on web browsers. It remembers information about your visit to our website, like your preferred settings, and

helps us optimize and improve the website's user experience. Cookies make it possible to provide a more accessible and more rewarding Service to you by enabling crucial functionalities.

The cookies we use (and other types of technologies we operate with a similar purpose as cookies, referred hereto as cookies) may vary over time as we continuously update and improve our Services. We will use necessary cookies immediately upon your access to our website, but to use analytics cookies, we need your consent.

Information about the use of the Services and marketing effectiveness is processed through Third-Party cookies provided by Google. Any data collected will be used in accordance with our Privacy Policy and Google's privacy policy, respectively. Users may opt out of Google's use of Google Analytics by installing a browser add-on available here <https://tools.google.com/dlpage/gaoptout>.

Additionally, Users may opt out of third-party vendor use of cookies by visiting the Network Advertising Initiative Opt-out Page <https://optout.networkadvertising.org/?c=1> .

More information on how Google Analytics works and how you can opt out of its use can be found on: <https://policies.google.com/technologies/partner-sites>.

You can manage your cookies preferences at any time in your browser or device settings. Depending on which browser and device you use, you may control which cookies you allow, which cookies you want to block in the future, and delete cookies. For more information about these settings, visit your browser or device's help page. Note that some of the Services might not work as intended if you choose to disable cookies.

## **8. Storage and transfer of personal data**

Personal data will be stored on secure servers controlled and maintained in accordance with sufficient privacy safeguards.

If you register an account with us, we will store your personal data for as long as you have an active account. We may keep your personal data for up to a year after you deactivate the account in our backup to maintain our backup storage data integrity and address any appeals or requests pursuant to your purchases. We may store some personal data for more extended periods if required to do so by applicable law or under our prevailing legitimate interest.

## 9. User's Rights

We will process all personal data in accordance with the principles of GDPR and especially having in mind Users' rights, in particular their right, in certain circumstances, to:

- Request access to any data held about them by Neuro AI in a commonly used and machine-readable format.
- Transmit their personal data to another data controller (free of charge), where such personal data is processed on the basis of consent or contractual performance unless in doing so, it would adversely affect the rights or freedoms of other Users or others, e.g., including trade secrets or intellectual property.
- Prevent the processing of their personal data or withdraw their consent at any time in certain circumstances.
- Ask to have inaccurate personal data amended.
- Erasure of their personal data where data is no longer required for the original purpose or where the User has withdrawn their consent, and no other lawful processing grounds apply.
- Object to the processing of their personal data in certain circumstances.
- Be notified where their personal data is subject to automated decision-making, i.e., profiling, including the logic involved, the significance and the envisaged consequence of such processing for the data subject, and object to such profiling in certain circumstances.

You may exercise these rights by contacting us at [contact@neiro.ai](mailto:contact@neiro.ai).

Where we are required to provide a copy of personal data, this will be free of charge; however, any further copies requested may be subject to a reasonable fee based on administration costs.

Where we stop processing personal data or delete the User's personal data, it will possibly mean that that particular User is unable to continue using or contributing to the provision of some of our Services, and they shall be notified accordingly.

Where you request us to rectify or erase (except data required by any legal obligations) your personal data or restrict any processing of such personal data, we may be required to notify certain third-parties to whom such personal data has been disclosed of such request.

## 10. Changes to the Privacy Policy

We reserve the right to change our Privacy Policy at any time. The current version of the Privacy Policy is available on the website, indicating the effective date in the heading. You are encouraged to check our Privacy Policy periodically.