

Velaura AI, Inc., is incorporated in the state of Delaware, United States with its headquarters located at 3200 Coronado Dr., Santa Clara, CA, 95054, United States and its subsidiaries (“Velaura AI”, “we”, “our” or “us”). This Privacy Notice explains how Velaura AI uses your personal information when you use Velaura AI’s website, products, services, or technologies or provide Velaura AI with your personal information in other ways both online and offline. This Privacy Notice also explains the steps Velaura AI takes to honor your personal information privacy rights.

Personal Information: Collection, Use, and Sources

“Personal information” means information that identifies, relates to, or describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or (in certain countries) household. This may include, without limitation, information that identifies you or which could be used to identify you, such as your name, address, email address, phone number, or persistent device identifier.

We collect several categories of personal information from you, depending on the Velaura AI product, service, or technology you use, including websites operated by Velaura AI and its affiliates, social media pages, business communications platforms, and other online services (collectively, the “Sites”), or information you otherwise provide to us through our interactions online and offline. We may also collect personal information about you from others. We use personal information for typical business management, operational, as well as commercial purposes (including to defend and protect us and others from harm or legal claims, and as required by applicable law), and as described more specifically below.

Online submissions: We collect personal information when you interact with us online, including:

- **Personal identifiers and professional and employment information.** We collect personal identifiers (such as your name, phone number, email address, postal address, username, social media profile, and password) and professional and employment information (such as your job title, company name, and information about your company and job function) to (i) respond to your requests, as well as process and fulfill orders; (ii) register you for Velaura AI events or programs; (iii) facilitate surveys, administer promotions, campaigns, sweepstakes, and contests; (iv) perform Site functionality; (v) manage accounts and preferences; (vi) provide downloadable content and online training and events; (vii) respond to customer service requests; and (viii) communicate with you for marketing and informational purposes.
- **Message and product review content.** We collect the messages you submit through contact, customer service, sign-up, forum, survey, purchase, and product review forms. We use this information to (i) respond to and fulfill your requests; (ii) better understand your preferences by cross referencing information provided by you through different channels and at different times, including by combining with other information that is

publicly available or provided by third parties; and (iii) provide, enhance, and personalize our product, service, and technology offerings and the Sites.

- **Audio and visual information.** To the extent we receive any digital photos you submit to us we may post them to public areas of the Sites (including our social media pages) with your consent. We may also record audio during customer service calls for quality assurance and training purposes.
- **Commercial transaction information.** We collect and generate commercial transaction information (such as records of products and services purchased) when you make purchases, request services, or register products on a Site. We may use this information to deliver and fulfill your orders, refer you to distributors and partners to assist you with your requests, respond to and fulfill your requests, improve our product and service offerings, tailor our marketing efforts, and administer accounts.
- **Online training, event, and program information.** We collect and generate registration and participation information related to online training and events. We may also collect personal identifiers and professional and employment information for employment verification to ensure you are eligible to participate. We use the information to operate and administer the training and events.
- **Inferences from the information listed above.** Velaura AI will use the information listed above in addition to publicly available information and information provided by certain third parties (such as lead generators) to draw inferences about your preferences and interests (such as your preferred products), to help us provide you with personalized content and offers, and to help us provide, enhance, and personalize our product, service, and technology offerings and the Sites.
- **Job applications.** We collect and use the personal information you submit through job applications and the careers Sites to consider you for employment and facilitate the communications on the Sites.

Velaura AI product technical information: When you install Velaura AI products, we may collect technical information (some of which may constitute personal information) about the Velaura AI products, including:

- **Velaura AI Products information.** Information about the Velaura AI product and its configuration, including, but not limited to, unique device identifiers, type, usage information, system model, operating system metrics, software versions, time zone/locale, installation logs, pool configuration, performance metrics and reports, and other detailed settings.
- **Error or bug reports.** Velaura AI products event information relating to issues you may experience with the performance of the Velaura AI products you use, such as error, diagnostic, configuration, performance reports, and crash data about software and hardware, and other information submitted to Velaura AI when reporting a technical issue.

We use this technical information to troubleshoot Velaura AI product errors and remediate failures or bugs, better understand how Velaura AI products operate and how they are used,

support your batch deployment of products, improve your user experience, improve and develop Velaura AI products, and to improve customer support.

By using Velaura AI products you grant Velaura AI the right to collect, use, process, and analyze the technical information as described above.

Offline collection: We collect personal information when you interact with us offline, including:

- **Conferences, trade shows, training, and similar events.** You may provide us with personal information at conferences, trade shows, and similar events. Such personal information will typically consist of your personal identifiers (such as your name and contact details) and professional and employment information (such as your job title and company name from your business card or badge scan).
- **Customer service.** For quality and training purposes and to meet our legal obligations, we may monitor and record customer service calls, which may contain your personal information (such as personal identifiers, professional and employment information, and audio of the conversation).
- **Facility visits.** We may collect video and audio of you for security and internal business purposes when you visit our facilities.

Collection from others: In some cases, we obtain personal information from other sources, including:

- **From your employer.** As part of providing products and services to your employer, your employer may provide personal information about you to us. Such information typically includes personal identifiers (such as your contact information) and professional and employment information (such as your job title and function).
- **From others selling our products and services.** We may work with others (including resellers and merchants of our products and services) so they can sell products and services for us online and offline. When you purchase our products or services, we may receive personal identifiers (such as your name, email address, and shipping address) and commercial transaction information (such as the name of the product(s) you purchased and the date of purchase) from others to fulfill your order, communicate with you about your order and other products, create aggregate and anonymous reports about products and services purchased, and as may be necessary to comply with our legal obligations.
- **For marketing purposes.** We may collect personal identifiers (such as your name and contact details) and professional and employment information (such as your job title and company name) from public and non-public sources for updates, newsletters, and marketing purposes. Examples of public sources include trade directories or social media platforms, for example LinkedIn. Examples of non-public sources include marketing companies from which we obtain marketing leads or event organizers where Velaura AI is an exhibitor.

De-identified or Aggregated Information: We de-identify and/or aggregate personal information we receive and may use and disclose it for any purpose.

Direct Marketing

Where you consent in accordance with applicable law, we use your personal information to provide you with marketing communications, including, but not limited to information about our products and services, new launches, promotions, and special offers. We send such communications by email, SMS text message, and/or other form of electronic message, push notification, social network message, or any other medium which becomes relevant from time to time.

You can opt out of receiving marketing communications from Velaura AI at any time by writing to info@velaura.ai or by following the unsubscribe instructions in the Velaura AI communications. If you opt out of marketing communications, Velaura AI may still contact you in the event of a change to our terms of use, Privacy Notice, concerning your account, or for other informational purposes.

Disclosure of Information

We share personal information for our business and commercial purposes and as more specifically described below:

- We share personal information with our employees, independent contractors, and service providers (such as IT service vendors, website hosting facilities, and email distribution, customer support, sales and training services) so they can perform a business, professional, or technical support function for you or Velaura AI. They are permitted to use the personal information only to provide the services to you and us.
- We share personal information with trusted third parties to help us respond to inquiries, provide products and services to you such as fulfilling and delivering orders, processing payments, performing social media functions, and administering surveys and contests, training, and events. In these situations, you are directing us to intentionally disclose personal information so we can provide our products and services and respond to your requests.
- We share any personal information among our affiliates for business and commercial purposes.
- We may provide personal identifiers and training, event, and program attendance and participation information to your employer whose information you provide when you have registered to participate in an Velaura AI training, event, or program in connection with your employment. Your employer's privacy policies also apply when they receive the information.
- We will disclose personal identifiers where you give us permission to disclose them for marketing and other purposes.

- We may disclose personal information about you to law enforcement, the courts, our advisors, and others who participate in the legal process, if necessary to do so by applicable law or based on our good faith belief that it is necessary to enforce or apply the Sites' terms of use, to comply with applicable law, or to protect Velaura AI, the users of the Sites, and others.
- In the event of a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another business unit, we will provide relevant personal information to the persons and/or entities assuming control of such business unit, to our advisors, and as otherwise necessary to complete the transaction as permitted by law or contract.

We take reasonable steps to ensure that personal information about you that we share with a third party will be held securely by that party and only be used for the purposes for which it was provided to them.

Security and Quality

Velaura AI will take reasonable steps to protect personal information. We use a variety of security technologies and procedures to help protect personal information from unauthorized access, use, and disclosure. Although we make efforts to secure your personal information, we cannot guarantee the safety of any personal information you transmit to us online.

Retention

We will retain your personal information for as long as reasonably necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, regulatory, tax, accounting, and reporting requirements. We may retain your personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you. At the end of our retention period, we will either securely delete or anonymize the personal information. We may retain copies in backups and archives consistent with applicable laws and regulations.

Cross-Border Data Transfers

Where necessary, we may need to transfer your personal information to another country to enable us to provide you with our products and services, for marketing purposes, for our business purposes, and for customer relationship management purposes. These transfers can take place within the Velaura AI group of affiliates and subsidiaries but also to selected third parties. Not all countries have laws offering the same level of protection for personal information as those where you are located when your personal information is received by Velaura AI. Velaura AI will take reasonable steps to transfer personal information securely.

Children

We do not knowingly collect, maintain, or use personal information from children, and no part of the Sites is directed to them. If you learn that your child has provided us with personal information without your consent, you may alert us at info@velaura.ai. If we learn that we have collected any personal information from children, we reserve the right to delete it and terminate the child's account, if any.

Velaura AI's Cookies Policy

We collect online identifiers (including IP address and device identifiers), information about your web browser and operating system, website usage activity information (including the frequency of your visits, your actions on the Sites (including whether you have downloaded any content or files), if you arrived at any of the Sites from another website, i.e. the URL of that website, and the website you visit after leaving a Site), and content-related activity when you visit the Sites or receive our emails or newsletters. As you interact with the Sites, we may collect this technical information by using cookies and other similar technologies. We use cookies and similar technologies to make navigation on the Sites more efficient, help remember your preferences, display personalized ads, and to generally improve your browsing experience. We may use screen capture, session replay, and other web tracking technologies to assist us in providing technical support. We may also record meetings you have with us via audio (e.g., telephone) or video (e.g., video conferencing) for quality control and other internal business purposes. We may use cookies to save your settings and to provide customizable and personalized services (such as to hold your registration information). We may also use cookies to deliver content tailored to your interests. Our cookies may enable us to relate your use of the Sites to personal information that you previously provided. The information that we collect with cookies also allows us to statistically analyze usage of the Sites, and to improve and customize our content and other offerings. You do not have to accept cookies and consent can be withdrawn at any time, although you may not be able to use certain features of the Site. You can do this by activating the settings on your browser that allows you to refuse all or some cookies.

Links to External Websites

Velaura AI's services and technologies, including its websites, and the Sites may contain links to others' websites. These other websites are not covered by this Privacy Notice, and we are not responsible for their privacy practices. We encourage you to read the privacy notices and policies of those other websites.

Your Privacy Rights

Certain jurisdictions have specific legal requirements and grant privacy rights with respect to personal information, and we will comply with restrictions and any requests you submit as required by applicable law. For example, you may have the right to review, correct, and delete personal information we have about you, or to consent or withdraw consent to certain uses or sharing of personal information. You may exercise these rights by submitting a request as described below.

Changes, Oversight and Questions

Due to the rapidly evolving changes on the internet and our business, we may update this Privacy Notice. Review this Privacy Notice to remain aware of our privacy practices. All revisions will be posted to the relevant Site. If we make any material changes, we may provide you with additional notice (such as adding a statement to our homepage or sending you a notification). If you do not agree to the changes, please do not continue to use the Sites or Velaura AI products or services through which you have provided or may provide us with your personal information.

Comments and questions regarding this Privacy Notice should be directed to info@velaura.ai.

Information for Individuals Located in the European Economic Area, UK and Switzerland

European Economic Area (“EEA”), United Kingdom (“UK”) and Swiss data protection laws offer additional rights and protections for individuals located in these countries. Further to the information set out above, the following additional information applies to you if you are located in the EEA, UK, or Switzerland:

- **Controller:** The controller of the website www.Velaura.AI.com is Velaura AI, Inc., 3200 Coronado Dr., Santa Clara, California, 95054, U.S.A.
- **Basis of processing:** Where you give us your personal information to receive or use a product, service, or technology from us, we process your personal information on the basis that such processing is necessary to give effect to the contract between us. Where you give us your personal information for any other reason, we process your personal information for our legitimate business purposes to respond to your request (for example, providing you with access to our Sites or providing you with direct marketing that you have requested) or on the basis of your explicit consent.
- **Transfers:** Your personal information may need to be transferred to countries outside of the EEA, UK, and Switzerland for the reasons set out in the section “Cross-Border Data Transfers” above. Jurisdictions to which your personal information may be exported include the USA and India. Some countries do not offer the same level of protection for your personal information as exists within the EEA, UK, and Switzerland.

Information for Individuals Residing in the United States

If you are a resident of the United States, your state of residence may provide you additional rights in relation to the processing of your personal information. Further to the information set out above, the following additional information may apply to you. Unless otherwise required by applicable law, the following terms shall have the following meanings:

- **“Process” or “processing”** means any operation or set of operations performed, whether by manual or automated means, on personal information or on sets of personal

information, such as the collection, use, storage, disclosure, analysis, deletion or modification of personal information.

- **“Targeted advertising” or “Cross-context behavioral advertising”** means displaying advertisements to an individual where the advertisement is selected based on personal information obtained from that individual’s activities over time and across nonaffiliated websites or online applications to predict such individual’s preferences or interests.
- **“Sale” or “sell”** means renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, an individual’s personal information by the business to a third party for monetary or other valuable consideration.
- **“Share,” “shared,” or “sharing”** means sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, personal information to a third party for cross-context behavioral advertising.
- **“Profiling”** means any form of automated processing of personal information to evaluate certain personal aspects relating to a natural person and in particular to analyze or predict aspects concerning that natural person’s performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location, or movements.

Right to Know and to Access. Subject to certain exceptions, and legal obligations, you may have the right to request that we disclose certain information to you about our collection, use, and disclosure of your personal information, such as the following:

- The categories of personal information we collected about you;
- The categories of sources of that information;
- The business or commercial purposes for which we collect, sell, or share personal information about you;
- The categories of personal information about you that we have disclosed and the categories of persons or vendors to whom it was disclosed; and
- The specific pieces of personal information we have collected about you.

This information is disclosed above in the section “Personal Information: Collection, Use, and Sources.” To protect your personal information, we may request additional information to verify your identity before we act on your request. To the extent legally required, we will provide the information you request, in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance. We may provide this information to you via email to the email address you have provided with your request.

Right to Correction. You may have the right to request that we correct any inaccurate personal information we maintain about you. In response to your request, we may request additional information showing that the information you want to correct is inaccurate.

Right to Deletion. You may have the right to request that we delete your personal information. This right is subject to certain exceptions and legal obligations imposed by state or federal laws including, without limitation, privacy and employment laws. We will delete or deidentify personal information not subject to one of these exceptions from our records and, to the extent required, we will direct our service providers to take similar action.

Right to Opt-Out. Depending on where you reside, you may have the right to opt-out of the processing of your personal information for the purpose of (i) the sale your personal information by Velaura AI to third parties for monetary or other valuable consideration, (ii) targeted or behavioral advertising, or (iii) certain profiling activities.

Non-Discrimination or Retaliation. We will not discriminate or retaliate against you for exercising any of your data privacy rights.

Additional Notice for California Residents

Right to Limit Use and Disclosure of Sensitive Personal Information. Under the California Consumer Privacy Act, as amended by the California Privacy Rights Act (collectively, the “CCPA”), you have the right to direct us to limit our use of your sensitive personal information that we use to infer characteristics about you to that use which is necessary to fulfill the purposes reasonably expected by an average consumer who requests those goods or services. California law considers the following pieces of personal information to be “sensitive:” social security number, driver’s license number or other government-issued identification number (e.g., passport numbers), financial account number, any health insurance or medical identification number, an account password, security questions and answers, or unique biometric data. We use sensitive personal information only as it is necessary to fulfill the purposes for which it was collected, and we do not use it to infer characteristics about you.

California Shine the Light. Although Velaura AI does not rent, sell, or share personal information (as defined by California Civil Code §1798.83) with other people or unaffiliated companies for their direct marketing purposes, residents of California have the right to request information from us regarding other companies to whom we have disclosed certain categories of information during the preceding year for the other companies’ direct marketing purposes. If you are a California resident and would like to make such a request, please contact info@velaura.ai.

Categories of Personal Information Sold or Shared to Third Parties

Velaura AI does not knowingly sell or share personal information of US residents under 16 years of age. For more information about the collection and use of personal information by third parties who process information collected by cookies and similar technologies that we permit them to use on our Sites, please refer to the Velaura AI Cookie Policy section above. Our use of cookies and similar technologies may be considered a “sale” or “sharing” under certain states’ privacy laws.

“Share” and “sharing” as used in this section, does not include transfers of personal information described in this Privacy Notice as part of a corporate business transaction, such as a merger, acquisition, or joint venture, or in the event of insolvency, bankruptcy, or receivership.

Beyond the use of cookies and similar technologies described above, Velaura AI does not “sell” or “share” personal information.

Categories of Personal Information Disclosed to Service Providers

We disclose personal information to certain third parties to enable them to fulfill the purposes described in the section “Personal Information: Collection, Use, and Sources” above. The personal information provided to our service providers is limited to that personal information which is necessary for them to fulfill these purposes. Our service providers have contractually agreed not to use your personal information other than as necessary to fulfill the applicable purposes and in accordance with applicable laws. In the preceding 12 months, we have disclosed the categories of personal information described above in the “Personal Information: Collection, Use, and Sources” section, with the following categories of service providers:

- Data Analytics Providers
- Operating Systems and Platforms Providers
- Workforce Management and Human Resource Management Providers
- Customer Support Providers
- Internet Service Providers
- Insurance Providers
- Technology Providers
- Cybersecurity Providers
- Government Entities
- Health & Safety Providers
- Financial Services Providers
- Audit and Investigation Providers
- Marketing Platform and Support Providers
- Social Networks
- Supply Chain Management Providers
- Legal Services Providers

We disclose personal information to our service providers in accordance with the purposes described in the section “Personal Information: Collection, Use, and Sources” above.

Additional 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. You can exercise this right by contacting info@velaura.ai with the subject line “Nevada Do Not Sell Request” and providing us with your name and the email address associated with your account.

Please note that we do not currently sell your personal information as sales are defined by Nevada law.

How to Submit a Request

When you make a request, we may require that you provide information and follow procedures so that we can verify the request and your jurisdiction before responding to you. For example, individuals may be required to submit their email address, and may also be asked to provide their name, location, and telephone number so that we can verify the request.

Certain states allow their residents to use an authorized agent to make privacy rights requests. We require an authorized agent to provide us with proof of the data subject's written permission (for example, a power of attorney) that shows the authorized agent has the authority to submit a request for the data subject.

The verification steps we take may differ depending on your jurisdiction and the request. If possible, we will match the information that you provide in your request to information we already have on file to verify your identity. If we are able to verify your request, we will process it in accordance with applicable law. If we cannot verify your request, we may ask you for additional information to help us verify your request.

We will respond to your request within the time period required by applicable law. When we are not able to fully address your request, we will notify you.

Please direct requests (with a return email address where possible) by email to info@velaura.ai

Information for Individuals Located in Brazil

Brazilian data protection laws (e.g., Law No. 13,709/2018 (the Brazilian General Data Protection Law, the "LGPD")) offer additional rights and protections for individuals located there. In addition to the information stated in the section "Your Privacy Rights" above, the following additional information applies to you if you are located in Brazil:

- **Personal information rights:** You have the right to request confirmation of processing of your personal information, to request access, correction, portability, and deletion of your personal information, to request anonymization, blocking, or deletion of unnecessary or excessive personal information or processing in violation of the LGPD, to revoke consent to the processing of your personal information, to request more information about recipients of your personal information from us, and to request more information about when you may have choices about our processing of your personal information and the consequences of not providing consent.
- **Inquiries:** If you have questions in relation to our processing of your personal information, please contact info@velaura.ai

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