**Privacy Policy**

Effective Date: This privacy policy (this “**Privacy Policy**”) is effective and was last updated as of Marcg 28, 2024**. [**March 28, 2024.]

This Privacy Policy applies when accessing, using, or otherwise interacting with [www.psilera.com](http://www.psilera.com/) and any related social media channel, website, application, feature, widget or other online service that is owned or controlled by Psilera Inc. and its affiliates (“**Psilera**”, “**us**”, “**our**,” or “**we**”) that posts or includes a link to this Privacy Policy (collectively, the “**Sites**”). This Policy describes the types of information we collect from persons who visit our Sites, and how we may use and share that information. By using a Site, you consent to this Privacy Policy. Please also review our Terms of Use which govern your use of the Sites.

Our Sites and services may contain links to other websites, applications, platforms and services maintained by third parties. The information practices of these third parties, including the social media platforms that host our branded social media pages, are governed by their privacy policies, which you should review to better understand their privacy practices.

We may also make chat rooms, forums, message boards, and news groups available to you. Please understand that any information you disclose in such areas becomes public information. We have no control over its use and encourage you to exercise caution when deciding what information to share.

Our Sites, including any message boards, chat rooms and forums we may offer, are for a general audience and not intended for, or designed to attract, individuals under the age of 18. We do not knowingly collect information through the Sites from visitors younger than 18 years old.

1. **Information We Collect and How We Collect It**

We may collect information from you both directly and automatically when you use or visit the Sites. Some of this information may be considered “personal information” under various applicable laws. We consider information that is linked to a specific, identifiable individual (such as your name and email address) to be personal information, and we treat additional information, including IP addresses and cookie identifiers, as “personal information” where required by applicable law. Note that Psilera may de-identify personal information so that it is non-personal, such as by aggregating it or converting it to a code, sometimes using a function commonly known as a “hash.” We will treat de-identified information as non-personal to the fullest extent allowed by applicable law. If we combine non-personal information with personal information, then we will treat the combined information as personal information under this Privacy Policy.

Psilera collects information in the following ways:

1. **Information You Provide to Us**. In the course of using the Sites, you may provide us with certain information, including contact information (such as your name and email address).
2. **Information We Collect Automatically From Your Use of the Sites**. When you use our Sites, we and our third-party service providers may automatically collect certain information (“**Usage Information**”). One of the ways we collect Usage Information is when you use our Sites, our servers automatically generate logs to help us determine how you use various features to improve our services. Usage Information is generally non-identifying, but if we associate it with you as a specific and identifiable person, we treat it as personal information. This Usage Information may include your IP address and unique device identifiers (“**Device IDs**”) for your computer, mobile phone, or other device used to access the Sites. A Device ID is a number that is automatically assigned to your device, and our servers identify your device by its Device ID. We may also collect and track other data and information relating to your device, including the hardware model, the Internet service provider you are using, browser, and operating system you are using. We may track your use of the Sites, including the features you access and how you interact with the Sites.

We may use the following types of tracking technologies (collectively referred to as “**Tracking Technologies**”) to automatically collect information when you interact with us online:

**Cookies and Local Storage** are small text files stored locally on your device that help store user preferences. These technologies are able to store a unique identifier for a device to us to recognize the device whenever the device is used to access our Sites. These technologies may be used for many purposes by us and our service providers, such as automatically collecting Usage Information, enabling features, and remembering your preferences. We may use cookies and other technologies to study usage patterns on the Sites, to study the effectiveness of our user communications, to manage and measure the performance of our Sites, and to personalize your experience of the Sites, such as to recognize you when you return to the Sites. The information we may store includes Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data. If you do not want to accept cookies, you can block them by adjusting the settings on your Internet browser. You can find more information about cookies and how they work at [www.allaboutcookies.org](http://www.allaboutcookies.org).

**Certain Browsers or Browser Add-Ons** may provide additional local data storage mechanisms that are used in a manner similar to cookies, and some of the content included on our Sites may make use of this local storage.

**Web beacons (also known as clear GIFs and pixel tags)** are small pieces of code used to collect usage analytics. They help us to determine, for instance, whether a page has been viewed or not and, if so, how many times. When you ask us to send you information on a promotion or a newsletter, we may use web beacons to establish how many of the emails are actually opened. We may use similar tools to collect such information from mobile devices. In addition, we may use a variety of other technologies that collect similar information for security and fraud detection purposes.

**Embedded scripts** are designed to collect data about your interactions with the Sites, such as the links you click on. The code is temporarily downloaded onto your device from our server or a third-party service provider, is active only when you are connected to a Site and is deactivated or deleted thereafter.

**Data Collection from Mobile Devices**. We may use embedded scripts and similar tools to collect data from mobile devices such as the hardware model, operating system and version, identification numbers assigned to your mobile device, such as the ID for Advertising (IDFA) on Apple devices, and the Advertising ID on Android devices, mobile network information, location data and website usage behavior. In addition, we may use a variety of other technologies that collect similar device and device interaction information for security, fraud detection, and maintenance purposes.

**Session replay technology** may record your interactions with the Sites, such as what pages you visit, how long you visit those pages, and any links you click or information you provide. We use this data for our internal business purposes, such as for website analytics, to improve the Sites and other products and services, and to address functionality issues.

We may also use a variety of other technologies that collect similar data for security, fraud detection, site functionality and operational purposes.

1. **Social Media**.We may permit you to interact with social media, including Facebook, Instagram, LinkedIn, and Twitter. When you interact with third-party platforms through the Sites, we may receive information about you. We may also receive information about you if other users of social media give us access to their profiles and you are one of their connections or "friends." The information we collect is subject to this Privacy Policy. The information collected and stored by the third party remains subject to the third party’s privacy practices, including, without limitation, whether the third party continues to share information with us, the types of information shared, and your choices with regard to what is visible to others on that third-party website or service. We or the third party may allow you to disable or remove the application or feature, in which case we will no longer collect information about you through the application or feature, but we may retain the information previously collected.

If you choose to post information to a third-party platform, that information may be public and the third party may have access to information about you and your use of the Sites. You may also choose to participate in a way that connects that third-party service with the Sites, such as posting to one of our pages on a social media site. Doing so may allow us to collect (or the third party to share) information about you, including personal information, and the third party may allow us to re-post content related to us on our own services.

In addition, these third parties may set their own cookies and collect information about your use of the Sites, including your IP address or other device identifiers. We encourage you to review the privacy policies of third parties that control platforms you post to or that connect to the Sites and set your privacy preferences with them.

1. **How We Use Your Information**

We may use non-personal information, including ideas, suggestions and feedback that constitute non-personal information, for any purpose, including for advertising, research, service and product development, and marketing purposes.

We also use information that we collect, including personal information and Usage Information, as disclosed in this Privacy Policy and as follows:

* 1. to provide the Sites to you and allow you to participate in the features the Sites offer, including registering you as a user if applicable;
  2. to improve our Sites and develop new Sites, services, products, promotions and other offerings;
  3. to customize and optimize our content for you, including delivering marketing communications about our products or services;
  4. to provide information on special offers and promotions from us using the contact information you provide;
  5. to contact you to respond to your questions, feedback, or requests;
  6. to communicate with you about our content, features or products you use or request, including to provide you with information concerning changes or updates to the Sites which may affect your use of the Sites or, in our discretion, changes to our policies;
  7. to respond to subpoenas, court orders or legal process, or to establish or exercise our legal rights or defend against legal claims;
  8. for internal business purposes, including to prevent fraud or other illegal activity, to prevent imminent bodily harm, or to protect ourselves and you from people violating our Terms of Use, or otherwise to protect our or third-party rights or interests, which may include sharing information with other companies, lawyers, courts, or other government entities; and
  9. in any other way we describe when you provide the information, or otherwise with your prior consent.

1. **How We Share Your Information**

We may aggregate, de-identify, and/or anonymize any information collected through the Sites such that the related information is no longer linked to your personal information. We may share non-personal information (including hashed or other de-identified data) with third parties for advertising and other purposes. We do not share your personal information with third parties for those third parties’ own direct marketing purposes unless we provide you the opportunity to opt-in or opt-out prior to such sharing, as required by applicable law.

In addition, we may share the information we have collected about you, including personal information and Usage Information, as disclosed at the time you provide us with information or your consent, and as described in this Privacy Policy, including:

1. **At Your Request.** We may share information when you direct us to do so, such as if we present you with an opportunity to receive marketing offers from a third party, or if you choose to engage with a social media service or third-party feature through which information about you is shared. We do not control the actions or policies of third parties, and you direct us to share your information at your own risk.
2. **Service Providers.** We may contract with certain companies to perform services on our behalf, including advertising, marketing assistance, e-mail delivery, hosting services, site maintenance and repair, security, quality assurance, customer service, surveys, and data research and analysis, and provide your information to them only to fulfill such services.
3. **Affiliates and Business Partners.** We may share your information with our affiliates, and with business partners to offer you certain products, services or promotions, in which case we will require those affiliates or business partners to honor this Privacy Policy. Affiliates include any parent company of ours and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.
4. **Sweepstakes, Contests and Promotions.** We may offer sweepstakes, contests, or other promotions (any of which, a “**Promotion**”) that may require registration. By participating in a Promotion, you are agreeing to the provisions, conditions, or official rules that govern the Promotion, which may contain specific requirements of you (including, except where prohibited by law, allowing the sponsor(s) of the Promotion to use your name, voice, likeness, or other indicia of persona in advertising or marketing materials). If you choose to enter a Promotion, personal information may be disclosed to third parties or the public in connection with the administration of such Promotion, including in connection with winner selection, prize fulfillment, as required by law, or as permitted by the Promotion’s terms or official rules (such as on a winner’s list).
5. **In Connection with Business Transactions**. In the event Psilera undergoes a business transaction, such as a merger with or acquisition by another company, or sale of all or a portion of its assets, we may transfer your personal information and other information to the successor organization in connection with such transaction and disclose it in the course of any due diligence subject to confidentiality. By providing your personal information, you agree that we may transfer such information to the other entity in such a transaction without your further consent. If material changes to the Sites’ privacy practices will occur as a result of the business transition, Psilera or its successor will attempt to notify you, including by posting a notice on the Sites.
6. **For Administrative and Legal Reasons.**  We reserve the right to use or disclose any information as needed to satisfy any law, regulation, or legal request; to protect the integrity of the Sites; to fulfill your requests; to cooperate in a law enforcement investigation, an investigation on a public safety matter, or an investigation into claims of intellectual property infringement; to protect and defend the legal rights and/or property of Psilera and any of our subsidiaries, affiliates, and shareholders, or the Sites, any of their users, or any other party; or, in an emergency, to protect the health and safety of users or the general public.
7. **With Your Consent.** We may disclose your personal information for any other purpose with your consent.
8. **Third Party Advertising and Analytics/Privacy Controls**

We may work with network advertisers, ad agencies, analytics service providers, and other vendors to serve our advertisements on our Sites and third-party websites, apps, and elsewhere online and to provide us with data regarding use of and traffic on the Sites (including without limitation the pages viewed and the actions users take when visiting the Sites) and the effectiveness of our advertisements. For example, if you click on an advertisement for Psilera, our service provider(s) may be able to tell us the advertisement you clicked on and where you were viewing the advertisement. The advertisements you see may be served by us or one or more third parties, who may use data about your activities on the Sites, and other websites and services you visit across the various devices you use, to provide you targeted content and advertising. Our service providers may collect certain data about your visits to and activity on the Sites and other websites and services and may use this data to target advertising to you.

These third parties may set and access their own tracking technologies on your device (including without limitation cookies and web beacons) and may otherwise collect or have access to information about you (such as Device IDs). Some of these parties may collect personal information over time when you visit the Sites or other online websites and services. Cookies and web beacons, including without limitation those set by third-party network advertisers, may be used to (among other things): target advertisements, prevent you from seeing the same advertisements too many times, and conduct research regarding the usefulness of certain advertisements to you. We may share certain data such as device identifiers, Device IDs, hashed information, records of transactions you conduct on our Sites and other types of de-identified or pseudonymized data with third-party advertising companies, analytics providers, and other vendors for advertising and analytics purposes. In addition, we and our third-party service providers may use this data to perform matching with third-party cookies to provide targeted online marketing. If you would like to opt-out of third-party advertising and analytics, there are a variety of tools available to you:

**Cookie Opt-Out Tools.** If you do not want to accept cookies, you can block them by adjusting the settings on your Internet browser. If you block all cookies or delete all cookies our Sites may not work properly.

**Global Privacy Controls.** Global Privacy Control (“**GPC**”) is a technical specification in your browser settings that you can use to automatically inform websites of your privacy preferences with regard to third party online tracking. You can find out more about and [set up GPC here](https://globalprivacycontrol.org/#about). Like many websites and online services, we may not alter our practices when our systems receive a GPC signal from a visitor’s browser, except as specifically required by law.

**NAI/DAA Opt-Out.** Some of the companies we use for delivery of advertising may be members of the Network Advertising Initiative (“NAI”) or Digital Advertising Alliance (“**DAA**”). The NAI provides information regarding targeted advertising and the [opt-out procedures of NAI members](https://optout.networkadvertising.org/), including opt-out mechanisms for web browsers, mobile and other connected devices, and a tool to opt out from participating NAI members using your hashed email address for interest-based advertising. You may also want to visit the [DAA's website](https://optout.aboutads.info/), which provides information regarding targeted advertising and offers an opt-out for DAA-participating companies. Please note that we also may work with companies that offer their own opt-out mechanisms and may not participate in the opt-out mechanisms that we linked above.

**Google Analytics**. We use Google Analytics, which uses cookies and similar technologies to collect and analyze information about the use of the Sites and report on activities and trends. This service may also collect information about the use of other websites, apps, and online services. You can learn about Google’s practices by going to <https://policies.google.com/technologies/partner-sites>, and opt out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

**How We Respond to “Do Not Track” Signals**

Do Not Track (“**DNT**”) signals offered by some web browsers are settings that request that a web application disable its tracking of an individual user. When you choose to turn on the DNT setting in your browser, your browser sends a special signal to websites, analytics companies, ad networks, plug in providers, and/or other web services you encounter while browsing to stop tracking your activity. There is no consensus among industry participants as to what “Do Not Track” means in this context. Like many websites and online services, we may not alter our practices when our systems receive a “Do Not Track” signal from a visitor’s browser, except as specifically required by law. You can learn more about Do Not Track at [www.allaboutdnt.com](http://www.allaboutdnt.com).

1. **Third Party Content and Links**

This Privacy Policy does not apply to the practices of third parties that we do not own or control, including, but not limited to, any third-party websites, services and applications (and the information or content contained therein) ("**Third Party Sites**") that may be linked to or from the Sites and/or that you elect to access through the Sites. When you navigate away from our Sites to another site, this Privacy Policy is no longer in effect. Those Third Party Sites may use their own cookies or other tracking technologies, may independently collect information from you or about you, and match your data with data from other sources and use your data in ways other than described in this Privacy Policy. Your browsing and interaction on any Third Party Sites is subject to such Third Party Sites’ own rules and policies, which we encourage you to review prior to providing them with your information.

1. **Your Choices About the Information We Collect**
   1. **Marketing** **Emails.** You may unsubscribe from any marketing email we may send you through the opt-out mechanism included in each such email, or you can communicate your preferences to us by emailing us at [info@psilera.com attn: Privacy].We reserve the right to send you certain communications relating to your use of the Sites, service announcements, notices of changes to this Privacy Policy or other terms, or similar administrative or transactional messages, and such messages will be unaffected by any choice to opt out of marketing communications.
   2. **Deletion or Correction.** Please submit any requests for deletion or correction to us at: [info@psilera.com attn: Privacy]. Please provide full details about your request, including your contact information and anything you believe is relevant. Under certain circumstances, we may not fulfill your request, such as when doing so would interfere with our regulatory or legal obligations, when we cannot verify your identity, or when applicable law allows or requires us to retain that information. Note that in any case data may persist internally for administrative purposes and that residual data may remain on backup media or for other reasons.
2. **Retention and Security of Your Information**

We typically retain your personal information for the time necessary to serve the purpose for which it was originally collected or you authorized, and in accordance with applicable law. For example, we will retain your information for as long as necessary to comply with our legal obligations and rights, to resolve disputes, and to enforce our agreements.

We implement commercially reasonable security measures to protect the security of your information. However, no website or Internet transmission is completely secure, and we cannot guarantee that unauthorized access, hacking, data loss, or other breaches will never occur. We urge you to take steps to keep your personal information safe.

1. **General Audience Sites**

The Sites are not intended for children younger than the age of 18. We do not knowingly collect or solicit personal information from children younger than the age of 18.

1. **Changes to this Privacy Policy**

To the extent allowed by applicable law, we reserve the right to change this Privacy Policy at any time. We will inform you by posting a notice on the Sites. We may also provide notice to you in other ways, such as through contact information you have provided. Your continued use of the Sites after the effective date of the revised Privacy Policy will constitute your consent to those changes to the fullest extent allowed by applicable law. However, we will provide notice and obtain your consent (opt-in or opt-out) if required. Note that you may no longer be able to use certain or any features of the Sites if you do not consent to the revised Privacy Policy.

1. **Consent to International Transfer of Your Information**

We are a US-based company so if you are located outside of the United States, please be aware that the information that we collect from you will be transferred to, and stored at, a destination outside of your country. By using our Sites or providing us with any information, you fully understand and unambiguously consent to this transfer to, and processing, usage, sharing, and storage of your information in the United States and other jurisdictions, which may have different and in some cases less protective privacy laws than those in your country. As a result, this information may be subject to access requests from governments, courts, or law enforcement in the United States and other countries according to the laws in those jurisdictions. Your information will also be disclosed to third parties as described in the “How We Share Your Information” section above.

1. **Contact Us**

If you have any questions, comments, or concerns regarding our Privacy Policy and/or practices, please send an email to: [info@psilera.com attn: Privacy]**.**