

## **Effective Date: 06-17-2024**

We understand the importance of online privacy. This Privacy Policy explains the information Aira Tech Corp (“Aira Tech”) collects, how we collect it, and the purposes for which we use it. This policy applies to your use of our website, located at <https://aira.io> (the “Site”), the Aira mobile applications and other Aira software, including apps installed on third-party devices (the “Apps”). The Site and the Apps are referred to collectively as “Aira.”

By accessing or using Aira you acknowledge that you have read and understood this Privacy Policy and that you have read, understood, and agree to be bound by our Terms of Service at <https://aira.io/terms-of-service> (the “Terms”). If you do not agree, please stop using Aira immediately. Some words and phrases that are capitalized in this Privacy Policy (like “Interaction” and “Visual Interpreter”) are explained in the Terms.

### **Information We Collect**

When you interact with Aira (including when you register for an account, purchase a subscription, or participate in an Interaction), we, or our service providers (acting on our behalf), collect “Personal Data” (which is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household). We may also collect information about you from Aira users. The circumstances in which we collect Personal Data, and the types of Personal Data we collect, include:

#### *Data Aira Collects or Generates*

When you register for or use Aira, we collect Personal Data to help us provide Aira to you, including:

- Contact information (such as name, postal or e-mail address and phone number). Note that by providing an email address or telephone number when prompted to do so for authentication or verification purposes, you consent to our use of that information for such purposes. Additionally, where we use Google products for authentication purposes, phone numbers that you provide for authentication will be sent and stored by Google to improve its spam and abuse prevention across Google services.
- Credit card or other payment account information when you pay for a subscription.
- Images we take with your permission for purposes of providing Aira to you (such as when we take a picture to make it easier for the Visual Interpreter to read a document).
- Other content we collect or generate to provide Aira to you (such as video, audio, or transcripts of chat messages that you send to our human Visual Interpreters or to solutions like our Access AI feature).

### *Data you Provide During an Interaction*

We collect various types of Personal Data that you provide during your Interactions.

The types of Personal Data that we collect will vary depending on the nature of the Interaction (such as whether you are speaking with a human Visual Interpreter or interacting with tools like our Access AI feature), and may include:

- Information you voluntarily and explicitly request us to store for your benefit only, such as passwords and any other security information used to access Aira or other services you ask us to access on your behalf.
- Payment information you voluntarily provide during an Interaction to allow a Visual Interpreter to assist with payment for products and services on third-party websites.
- Health information you voluntarily provide (such as information about your current level of vision, food allergies, or chronic conditions).
- Demographic data (such as your country, organization, and title, as well as information you voluntarily provide about your family or lifestyle).
- Photographs and videos we capture at your request (such as pictures of you or your surroundings, and images (and potentially videos) you capture or upload while using tools like our Access AI feature).
- Other content you share during an Interaction, including Personal Data contained in User Content, as described in our Terms.

### *Data About You From Other Sources*

We collect information about you from other sources, such as when:

- Users provide your information to us in connection with referral programs.
- A user allows you to demo Aira.
- You are in photographs, audio, or video created or submitted during an Interaction, or your information is shared by the user with Aira. Please note, in these situations, it is the responsibility of the Aira user to obtain any required consents related to your information.
- You link your Aira account to your accounts with other platforms such as Uber or Lyft.
- You create or login to your Aira account using a social network (such as Meta) or other third party platform (such as Google or Apple). In these situations, we will collect information such as your name, email address, friends list, and profile information, as controlled by that service or as authorized by you via your privacy settings for that service.

### *Data Collected Using Automated Means*

We collect the following types of information automatically:

- Usage and Log Information.

- Information about your activity (such as content and advertisements you have accessed, seen, forwarded and/or clicked on).
- Log files.
- Diagnostic, crash, website, and performance logs and reports.
- Geolocation, motion, and direction of travel information.
- Device and Connection Information:
- Network or Internet protocol address.
- Type of browser you are using (e.g., Chrome, Safari, Firefox).
- Type of operating system you are using (e.g., iOS, Android or Microsoft Windows).
- Name of your Internet service provider (e.g., Comcast, Verizon or AT&T) and domains used by such provider.
- Mobile network.
- Device identifiers (such as Apple IDFA or an Android Advertising ID).
- Device settings, browser settings, and language.
- Information on actions taken or interactions with Aira, including viewed and exit pages and date or time stamps.
  
- Information from other websites and apps that link to Aira, such as the URL of the page that links to Aira and any details (such as your user credentials) provided by that website or app.

## **How We Use Your Information**

We, and our third party service providers acting on our behalf, use the Personal Data we obtain about you:

- To satisfy our contractual obligation to provide the Aira service to you when you subscribe or otherwise register to access Aira. For example, we use your Personal Data to:
  - Provide and communicate with you about Aira, including setting up and administering your registration and account.
  - Provide technical support.
  - Fulfill your requests, including without limitation requests for notifications.
  
- When we have a legitimate business interest to do so. For example, we use Personal Data to:
  - Enforce the legal terms (including without limitation this Privacy Policy and our Terms of Use) that govern your use of Aira.
  - Prevent fraud or potentially illegal activities on or through Aira.
  - Protect the safety of our users.
  - Advertise and market our products and services to you.
  - Analyze the performance of the ads, offers and content on Aira, as well as your interaction with them.
  - Improve and develop Aira.

- With your consent. For example, we use Personal Data to:
  - Communicate with you about other products, programs or services that we believe may be of interest to you, when you consent to join our mailing list or receive marketing communications from us; and
  - Process the Personal Data you voluntarily provide when you use Aira.

Note that if you share sensitive data while using Aira (for example, if you ask a Visual Interpreter to read a medical bill for you or to use your credit card to help you complete a transaction on a website), you consent to our processing the information as described in this Privacy Policy.

We also may use the information in other ways for which we provide specific notice and obtain consent where required at the time of collection. For example, we may contact you about opportunities to share your Aira experience, to help with testing new products, or to participate in research by third parties. We may also contact you about participating in services that use generative artificial intelligence (AI) in ways that differ from how our Access AI feature uses AI. For example, we may contact you with opportunities to participate in programs where data that you submit could be used to train AI models used by other companies. You don't have to participate in any such opportunity to use Aira.

## **Whom We Share Information With**

We share your Personal Data as follows:

- **Service Providers.** We share your Personal Data and other information with service providers that we have engaged to perform business-related functions on our behalf. This includes service providers that: (a) conduct research and analytics; (b) create content; (c) provide customer, technical or operational support; (d) conduct or support marketing (such as email or advertising platforms); (e) fulfill orders and user requests; (f) handle payments; (g) host our Site; (h) maintain databases; (i) provide services using generative artificial intelligence (AI), such as helping us provide solutions like our Access AI feature; and (j) otherwise support or help us provide Aira. We limit our sharing of data to the extent necessary for these service providers to perform their duties.
- **Legal Process; Fraud Prevention.** We will share your Personal Data and other information (i) if we are required to do so by law or legal process, (ii) when we believe disclosure is necessary to prevent harm or financial loss, or (iii) if it is relevant to an investigation of suspected or actual fraudulent or illegal activity.
- **Mergers, Acquisitions, and Business Transfers.** We will share your Personal Data if we are acquired by or enter into a merger with another company, or otherwise reorganize our business.
- **With your consent.** We will share your information with third parties when you ask or consent to us doing so.

## **Cookies and Similar Technologies**

Aira's Site uses cookies, mobile identifiers, and other technologies to identify you or your device.

The Aira App stores some of your preferences and settings on your mobile device, to help you sign-in to Aira, and resume where you left off when you last closed the App.

### *Cookies*

A cookie is a small text file that is placed on your device to store information. This data often consists of a string of numbers and letters that uniquely identifies your computer, but it can contain other information as well, including your IP address, clickstream patterns, and dates and times that you access a website.

We use cookies and similar technologies to store your preferences and settings (such as your preferred language), authenticate you when you sign into your account, and collect information about your interaction with our Site. For example, we use cookies to count the number of unique visitors to a web page and to develop other statistics about the use of the Site.

Our Site also includes social media cookies, including those that enable users who are logged in to a social media service to share content via that service.

Most browsers allow you to control cookies, including whether or not to accept them and how to remove them. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser. However, please be aware that some features of the Site may not function properly or may be slower if you refuse cookies.

We use cookies provided by Google Analytics to collect statistical information about the use of the Site. You can opt-out of Google analytics here: <http://tools.google.com/dlpage/gaoptout> (requires you to install a browser add-on).

### *Web Beacons*

Aira's Site also contains "web beacons" or clear GIFs, or similar technologies, which are small pieces of code placed on a web page or in an email, to monitor the behavior and collect data about the visitors viewing a web page or email. For example, web beacons may be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page. Web beacons may also be used to provide information on the effectiveness of our email campaigns (e.g., open rates, clicks, forwards, etc.).

## Your Rights and Choices

You have certain rights regarding the Personal Data we maintain about you. We also offer you certain choices about what Personal Data we collect from you, how we use that information, and how we communicate with you.

- You can control the Personal Data you provide to us. As the user, you are in control of when you use the Aira service. You control where the camera is pointing and what information is being shared via the microphone (e.g. what you say). You can choose to use Aira to interpret or describe visual information that may be sensitive such as health information or financial information. If you do not want to share this Personal Data with Aira, do not use Aira in situations involving this information.
- You can update and correct inaccuracies in your contact information by contacting us as described below.
- You can opt out of the collection and use of certain information which we collect about you by automated means by changing the settings in the device you use to access Aira.
- In certain jurisdictions, you can exercise your choice about cookies via the Cookie Consent notice displayed on the Site. Your browser may tell you how to be notified and opt out of receiving certain types of cookies. Please note, however, that without cookies you may not be able to use all of the features of the Site.
- You can at any time tell us not to send you marketing communications by e-mail by clicking on the unsubscribe link within the marketing e-mails you receive from us. If you have signed up to receive text messages from us and no longer wish to receive such messages, you may follow the instructions to stop delivery of such messages, which may include by replying "STOP" to the received text message.
- To the extent provided by applicable law, you may withdraw any consent you previously provided to us, or object at any time, to the processing of your Personal Data by contacting us as set forth below. Withdrawing your consent may mean that you will not be able to use certain Aira services or take advantage of certain features.
- When you access Aira through a mobile device, you will be asked to share your precise (GPS level) geo-location information with us so we can customize your experience and the content you receive. If you agree to such collection, in most cases, you will be able to turn off such data collection at any time by accessing the privacy settings of your mobile device and/or through the settings in the applicable mobile application. If you do so, certain features of Aira will not be available to you. You will not be able to use Aira for navigational assistance or to book a ride with a service like Uber or Lyft. Also, Aira will not be able to notify you when you enter a "Site Access" location or other location where free minutes may be available. Contact us using the details below for more information.
- If you are a California resident, California Civil Code Section 1798.83 permits you to request information regarding the disclosure of certain personal information about you to third parties for the third parties' direct marketing purposes. Aira

Tech does not disclose this personal information to third parties for their direct marketing purposes.

### *Additional Data Protection Rights in Europe*

If you live in the European Economic Area or the United Kingdom, you also have the right to:

- Obtain confirmation that we hold Personal Data about you,
- Request access to and receive information about the Personal Data we maintain about you,
- Receive copies of the Personal Data we maintain about you,
- Request that we provide certain parts of your Personal Data to you or transmit it directly to another company that processes Personal Data, and
- Have your Personal Data blocked, anonymized or deleted, as appropriate.

These rights may be limited in some circumstances under applicable law. To exercise these rights, please contact us as set forth below.

We may ask you to provide additional information for identity verification purposes or to verify that you are in possession of an applicable email account.

In addition, if you are in the European Economic Area or the United Kingdom and you have any complaints about how we use your Personal Data, you have the right to lodge a complaint with the data protection authority in your country. A list of data protection authorities is available at [https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm).

### **Monitoring, Recording and Retention of Your Information**

We reserve the right to monitor your Interactions for improving the Aira service including quality control and training purposes.

With some exceptions, we record audio and video of each Interaction where these are created. We may also record and retain transcripts of text chats, including texts sent during Interactions with tools such as our Access AI feature. We retain these recordings and transcripts for as long as necessary to fulfill the purpose for which they were collected. We do this for improving the Aira service including quality control and training purposes, and to improve Aira and make it more useful to you.

We will not record Interactions where we have business contracts in place that prohibit us from doing so (e.g., with certain employers, government agencies, and access partners). In this instance, we may be unable to provide Aira to you in certain circumstances where we require a recording as a requisite for providing Aira.

Also, if you ask the Visual Interpreter to stop recording during a particular Interaction, we will generally do so and delete the part of the Interaction that was previously

recorded. There may be instances where we are unable to comply with your request not to record an Interaction. If this is the case, we will let you know that we are recording the Interaction. You may then choose to end the Interaction if you do not wish to be recorded.

We will generally store information other than recordings until it is no longer necessary to provide the Aira service to you, until you ask us to delete it, or until your account is deleted; but there are some exceptions to this general rule. We will retain this information as we reasonably deem necessary to comply with the law, prevent fraud, collect fees, resolve disputes, troubleshoot problems, assist with investigations, enforce our agreements, and take other actions permitted by law.

Aira may contact you to get your consent to use a recorded Interaction in which you appear visibly or are heard for use in promotional, marketing, informational or other videos that may be posted, presented or otherwise made available in or on public platforms or that may be otherwise shared with third parties unaffiliated with Aira; provided, however, in no event will Aira publicize or otherwise present to third parties any recorded Interactions involving you without your explicit consent.

#### *International Transfer*

Aira is headquartered in the United States, so it is necessary for us to process your information in the United States. The data protection and other laws of the United States may not be as comprehensive as those in your country. We rely on multiple legal bases to lawfully transfer personal data internationally. These may include your consent and EU Commission approved model contractual clauses, which require certain privacy and security protections.

#### *Children's Personal Data*

Aira does not knowingly solicit or collect personal data from children under the age of 13 without consent from a parent or guardian. If you are under 13, please do not submit any Personal Data to us without the consent of your parent or guardian.

#### *Data Security*

We have put in place physical, electronic, and managerial procedures designed to help prevent unauthorized access, to maintain data security, and to use correctly the information we collect. These safeguards vary based on the sensitivity of the information that we collect and store.

Although we take appropriate measures to safeguard against unauthorized disclosures of Personal Data, we cannot assure you that Personal Data will never be disclosed, altered or destroyed in a manner that is inconsistent with this Privacy Policy. Please consider this in deciding what information you wish to share with Aira during an Interaction.



### *Third Party Links and Services*

Aira and some of our email communications contain links to other sites that we are not responsible for. We do not control, recommend or endorse these other sites. These other sites may also collect your Personal Data, and they may have their own privacy policies. We recommend that you review the privacy policy of any site that you access through Aira.

### *Changes*

We may update and post revisions to this Privacy Policy from time to time and will update the Effective Date when we do so. If we make any changes that may materially affect how we handle your personal information, we will not use your personal information in any way contrary to what you have agreed to without first providing you notice of the changes and obtaining your consent. We encourage you to review this page for the latest information about our privacy practices.

### **Contact Us**

If you have any questions or concerns about this Privacy Policy, please contact us by email at [support@aira.io](mailto:support@aira.io)