

1. Our Privacy Policy

Effective Date: 10-14 -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 access to and use of our service that facilitates communication across signed and spoken or written language (the “Service”). The Service includes related Aira Tech mobile applications and software (the “Apps”), as well as related interactions with Aira Tech.

By accessing or using the Service, 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 [link to updated terms] (the “Terms”). If you do not agree, please stop using the service immediately. Some words and phrases that are capitalized in this Privacy Policy (like “Interaction” and “Interpreter”) are explained in the Terms.

Information We Collect

When you interact with the service (including when you register for an account or participate in an Interaction), we, or our service providers (acting on our behalf), may 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). The circumstances in which we collect Personal Data, and the types of Personal Data we collect, depend on how you interact with the service and may include:

Data We Collect or Generate

When you register for or use the service, we collect Personal Data to help us provide the service 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 and email addresses that you provide for authentication will be sent and stored by Google to improve its spam and abuse prevention across Google services.
- Other content we collect or generate to provide the service to you (such as video, audio, or transcripts of chat messages that you send to our Interpreters).

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 and may include:

- Demographic data (such as your country, organization, and title, as well as other information you voluntarily provide).
- Sensitive information you voluntarily provide (such as health or financial information you disclose during an Interaction).
- 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.
- You are in audio or video created or submitted during an Interaction, or your information is shared with us by the user. Please note, in these situations, it is the responsibility of the user to obtain any required consents related to your information.
- You create or login to your account for the Service using a third party platform (such as Google, Apple, or Meta). 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:
 - Log files.
 - Diagnostic, crash, and performance logs and reports.
 - Geolocation, motion, and direction of travel information.
- Device and Connection Information:
 - Network or Internet protocol address.

- 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 and language.
- Information on actions taken or interactions with the Service, including viewed and exit pages and date or time stamps.
- Information from other websites and apps that link to the service, such as the URL of the page that links to the service 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 Service to you when you register to access the service. For example, we use your Personal Data to:
 - Provide and communicate with you about the service, 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 the service.
- Prevent fraud or potentially illegal activities on or through the service.
- 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 the service, as well as your interaction with them.
- Improve and develop the service.
- 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 the service.

Note that if you share sensitive data while using the service (for example, if your conversation involves medical information), 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 experience with the Service, to help with testing new products, or to participate in research by third parties. You don't have to participate in any such opportunity to use the service.

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. We limit our sharing of data to the extent necessary for these service providers to perform their duties. Also, we contractually require these service providers to take measures to protect Personal Data, including reasonable security measures. Note that most of our Interpreters are not directly employed by Aira Tech but instead work for service providers with whom we enter into contracts as described above. Other service providers include companies 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; and (i) otherwise support or help us provide the Service.
- **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.

Device Identifiers and Similar Technologies

The Service uses mobile identifiers and other technologies to identify you or your device.

Our Apps store some of your preferences and settings on your device, to help you sign-in to the service, and resume where you left off when you last closed the App.

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 Service. You control where the camera is pointing and what information is being shared via the microphone. You can choose to use the service to interpret information that may be sensitive such as health information or financial information. If you do not want to share this Personal Data with the service, do not use the service 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 the service.

- 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 parts of the service or take advantage of certain features.
- When you access the service through a mobile device, you may 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 App. 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 Data about you to third parties for the third parties’ direct marketing purposes. Aira Tech does not disclose this Personal Data 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. If you are in the UK, you may contact the Information Commissioner's Office: <https://ico.org.uk>. A list of data protection authorities in EU countries is available at https://www.edpb.europa.eu/about-edpb/about-edpb/members_en.

Monitoring, Recording and Retention of Your Information

We reserve the right to monitor your Interactions for improving the 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. 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 Service including quality control and training purposes, and to improve the Service 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 the Service to you in certain circumstances where we require a recording as a requisite for providing the Service.

You may ask the Interpreter to stop recording during a particular Interaction. 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 continue to be recorded.

We will generally store information other than recordings until it is no longer necessary to provide the 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 Tech 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 Tech; provided, however, in no event will we publicize or otherwise present to third parties for these purposes any recorded Interactions involving you without your explicit consent.

International Transfer

Aira Tech 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 Tech 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. Your parent or guardian can find out how to provide consent by contacting support@aira.io.

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 the Service during an Interaction.

Third Party Links and Services

The Service 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 such links.

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 Data, we will not use your Personal Data 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 Privacy Policy for the latest information about our privacy practices.

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