

Aira Privacy Policy

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 (the "Apps"), and the devices we provide to you (directly or through a third party), which may include “smart” glasses, wi-fi devices, and any associated software, peripherals, services and materials (collectively, the “Aira Hardware”). The Site, the App and the Aira Hardware are referred to collectively as "Aira."

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

Privacy Policy Highlights

Information We Collect

The information we collect includes:

- Name and contact details.
- 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.
- Information you voluntarily provide by using the Aira service, like health, financial and demographic information.
- Images that we capture with your permission or at your request.
- Contents of your communications with us (during Sessions, via email, or through the Site).
- Information you make available by linking your Aira account to your accounts with other platforms such as Uber and Lyft.
- Information shared by others (such as Aira users who refer you to us, who let you demo their equipment, or who transmit information about you during a Session).



- Information from Devices you use to access Aira including the IP address, device type, operating system and device identifier.
- Website interactions (such as the pages visited on the Site, time spent on each page, and search queries).
- Location information we collect to verify your proximity to Aira Access Locations or to assist you with navigation.

How We Use Your Information

Aira Tech uses the information we collect to:

- Provide the Aira service to you.
- Respond to your inquiries.
- Send you service announcements or other administrative messages relating to the Aira service or your relationship with Aira Tech.
- Improve the Aira services and our communications with you.
- Comply with our legal obligations, enforce our Terms of Service and other policies, and prevent fraud.
- Send you newsletters or notifications that you request.
- Advertise and Market our products and services to you.
- Process the Personal Data you voluntarily provide through Aira.

Who We Share Information With

We share your information:

- With our vendors, which work with us to provide services on our behalf, but only to the extent necessary for them to perform services for us (for example, we work with cloud providers that store data for us, but they do not have access to your Personal Data).
- As required by law or to bring a legal action.
- With third parties as part of a merger, acquisition or other corporate transaction.
- With your consent.



Cookies & Similar Technologies

Aira uses cookies, mobile identifiers, and other technologies to identify you or your device. We do this to store your preferences and settings, help you sign-in to Aira, and analyze Aira's performance.

Your Rights and Choices

You have the right to make choices about our collection and use of your information. For example, you can control the Personal Data that you share through Aira. If you live in the EEA or the UK, you have specific legal rights relating to a request to review the Personal Data we have about you, request that we restrict our use of the Personal Data we collect, or request that we delete your Personal Data or stop using it for certain purposes. You can exercise these rights by contacting us at support@aira.io or by writing to us at the address below.

Monitoring, Recording and Retention of Your Information

We reserve the right to monitor your Sessions and Communication for quality control and training purposes. With some exceptions, we record the audio and video of each Session and retain these recordings for up to 18 months for quality control and training purposes, and to improve Aira. If you ask us not to record a Session, we will either stop recording that Session or let you know if we are unable to comply with the request. We will generally store other information associated with you until it is no longer necessary to provide the Aira service to you or until you ask us to delete it. We may retain certain information to comply with our legal obligations or enforce our rights.

Other Important Privacy Information

- We are a U.S. company and the Personal Data we collect is processed in the United States. We rely on your consent and other EU Commission approved processes like model contract clauses as our lawful basis for all transfers from the EU to the U.S.
- We do not intentionally collect information from children under age 13.
- We use technical and organizational security measures appropriate to protect the information collected through Aira.
- We are not responsible for your use of third party websites or apps.



- We will notify you of any changes to our privacy practices via a notice on our Site or in your App.

Contacting Us

support@aira.io or at our contact information below.

Full Privacy Policy

Information We Collect

We collect information you voluntarily provide, as well as information that your Aira Hardware, computer, mobile phone, tablet, console or other device (collectively, “Device”) or browser provides automatically. We use cookies and similar technologies to make Aira perform better for you. You can opt out of the use of cookies and separately you can opt out of providing location information, but if you do, some features of Aira will not work correctly. Keep reading to learn more.

Personal Data You Provide

When you interact with Aira (including when you register for an account, purchase a subscription, or participate in a Session), we, or our service providers (acting on our behalf), collect “Personal Data” (which is information that relates to an identifiable individual) that you provide to us. The types of Personal Data we collect include:

- Contact information (such as name, postal or e-mail address and phone number, as well as any social media handle you choose to provide).
- 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.
- 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).
- Credit card or other payment account information when you pay for a subscription.
- Images we take at your request (such as pictures of you or your surroundings) or with your permission (such as when we take a picture to make it easier for the Agent to read a document).



- Other content you share during a Session or any interaction with Aira services (such as video of documents or people, and audio containing your voice and the voices of other people, including your interactions with Chloe, our virtual assistant).
- Information you make available by linking your Aira account to your accounts with other platforms such as Uber or Lyft.

Data About You From Others

We collect information about you when:

- Users provide your information to us in connection with referral programs.
- A user allows you to demo the Aira service.
- You are in the audio or video of an Aira Session, 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.

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, Internet Explorer).
- 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.

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 an Agent to read a medical bill for you), 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. But we will only contact you about these opportunities if you consent to this contact beforehand, and you don't have to participate in any such opportunity to use Aira.

Who 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; and (i) 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. For example, a data storage provider would not have access your Personal Data.
- **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

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 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.).

Do Not Track. Aira does not respond to Do Not Track signals.

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 calling us at the number 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 Aira.
- 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. 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. Please note that some Aira Hardware does not allow you to opt out of sharing geolocation data. 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 http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080.

Monitoring, Recording and Retention of Your Information

We reserve the right to monitor your Sessions for quality control and training purposes.

With some exceptions, we record the audio and video of each Session and retain these recordings for up to 18 months. We do this for quality control and training purposes, and to improve Aira and make it more useful to you.

We will not record Sessions where we have business contracts in place that prohibit us from doing so (e.g., with certain employers, government agencies, and access partners).

Also, if you ask the Agent to stop recording during a particular Session, we will generally do so and delete the part of the Session that was previously recorded. There may be instances where we are unable to comply with your request not to record a Session. If this is the case, we will let you know that we are recording the Session. You may then choose to end the Session 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.

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 other countries, such as 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 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. If you are under 13, please do not submit any Personal Data to us.

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 statement. Please consider this in deciding what information you wish to share with Aira during a Session.

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.

Updates

From time to time, we may update this Privacy Statement. We will notify you about material changes by either sending an email message to the email address you most recently provided to us or by prominently posting a notice on the Site or in your App.



Contacting Us

If you would like to exercise your data protection rights, or if you have questions about our privacy practices or this Privacy Statement, contact us at:

Aira Tech Corp
4225 Executive Sq. #400
La Jolla, CA 92037

Attn: _____

Email: support@aira.io

