

# Privacy Policy

## 1. Introduction

This Privacy Policy uses the same terminology and abbreviations as used in our Terms of Service document. This Privacy Policy governs and explains how we collect, use, and store your personal information.

The information about you can be divided into personally identifiable and non-personally identifiable information depending on whether information can identify you as a specific person. Personally identifiable information shall be referred to as "personal data."

In addition to the definitions provided for in the Terms, the following words and abbreviations shall have the meaning provided herein:

**"personal data"** means any information relating to an identified or identifiable natural person ("**User**"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**"processing"** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**"processor"** means a natural or legal person, public authority, agency, or other body which processes personal data on behalf of InnAIO.

**"personal data breach"** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored, or otherwise processed.

## 2. Personal data that we process

During your interaction with the Services or with us directly, we may process the following personal data:

- **Identity data** (such as first name, last name, username, or similar identifier)

- **Contact data** (such as billing address, email address, and telephone numbers)
- **Financial data** (such as bank account and payment card details)
- **Transaction data** (such as details of payments and services purchased)
- **Commercial data** (such as company name, business purpose, and requirements for video generation)
- **Profile data** (such as username and password, preferences, feedback, and survey responses)
- **Usage data** (such as information about how our website, products, and services are used)
- **Marketing data** (such as marketing and communication preferences)
- **Audio/Video data** (such as content uploaded as a data source for video generation)
- **Technical data** (such as internet protocol (IP) address, login data, browser, time zone setting and location, and operating system used for access)
- **Other information you choose to provide.**

We may collect personal data when you interact with the Services, when you register and customise an account, or when you contact us.

### 3. Purposes for the processing of personal data

We process your personal data for the following purposes:

- to provide you with access to our Services,
- to provide you with the Services you requested,
- to create and manage your account,
- to process payment for the paid Services,
- to provide you with customer support,
- to send you information about the Services,
- to send you advertising emails,
- to analyse and develop technical improvements to the Services,
- to comply with our legal obligations.

### 4. Legal basis for data processing

Depending on the type of personal data and the purpose for which it is processed, we process the personal data on the following legal basis:

- You have given us consent for data processing for a specific purpose,
- Processing is necessary for the performance of our obligations under the Agreements,
- Processing is necessary for compliance with legal obligations,

- Processing is necessary for the purpose of our legitimate interest.

We may process your email address to send you information about changes to the Services, introduce you to new Services, or provide general news about our Services. We have a legitimate interest in keeping you informed about the Services and promoting our new Services, which we believe might be interesting to you. You can unsubscribe from these emails at any time by following the unsubscribe link in the email. We will not use legitimate interest to send you advertising emails for any third-party services.

We may process your IP address and other technical data automatically when you access the Services. This is because we have a legitimate interest in ensuring the safety and integrity of our Services, and by collecting technical data, we can scan it and prevent malicious signs such as too many password failures, seeking exploits, and similar.

We may process information about how you use the Services and how you interact with the website through third-party analytics tools. We process this data under our legitimate interest in analysing the performance of the Services and updating our Services. We aim to minimise the amount of personal data included in such information and to anonymise the data wherever possible. Session information is anonymised and used only for research purposes in order to improve and adapt our Services. Third-Party tools cannot connect the data about the session to a specific User.

We may process the content you provided to generate a video through Services for our internal research or to improve our Services or other InnAIO technologies. We rely on our legitimate interest of improving the Services and developing new technologies. Such processing of your content is typically expected with Services that depend on constant research and development through the use.

## 5. General provisions

Some Services will not be available to you if you do not provide requested personal data; for example, you cannot register for an account if you do not provide your name and email. In addition, different Services may require additional information that will be requested when requesting the specific Service.

We may keep records of any questions, complaints, or compliments made by you and the response, if any. Whenever you contact us, we shall collect any information which you choose to provide. We shall store and use this information only to respond to your inquiries.

We do not sell or rent personal information to any third-party. We use collected information for our internal and marketing purposes, as necessary by the nature of the Services, and only in accordance with this Privacy Policy. In some instances, we are obliged to comply

with court orders and government requests and provide information or parts of it to authorised bodies.

We have implemented security procedures and measures to ensure appropriate protection of the personal data we process against any misuse, unauthorised access, disclosure, or modification.

We acknowledge that the safety of your personal data is one of the highest priorities, and therefore only authorised processors have access to your information. Although we take all appropriate measures in respect to keeping your personal data secure, you understand that no data security measures in the world can offer 100% protection. If we ever find or suspect a personal data breach, we will, without delay, within seventy-two (72) hours after becoming aware of it, notify the appropriate supervisory authority about the breach and Users where necessary.

## 6. Children's privacy

Our Services are intended for a general audience and are not targeted at children under the age of 16 (“minors”). We do not knowingly collect or ask for information from minors and do not knowingly allow minors to use the Service.

## 7. What Cookies Do We use, and What For?

- The site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of our Site and to provide and improve our products and services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy is protected and respected at all times.
- By using our Site, you may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than us. We use third-party Cookies on our Site for advertising purposes. These Cookies are not integral to the functioning of our site.
- All Cookies used by and on our site are used in accordance with current English and EU Cookie Laws.
- Our site uses analytics services provided by Google Analytics and Facebook™. Website analytics refers to a set of tools used to collect and analyze usage statistics, enabling us to better understand how people use our Site. This, in turn, enables us to improve our Site and the products and services offered through it. You do not have to allow us to use these Cookies, as detailed below. However, whilst our use of them does not pose any risk to your privacy or your safe use of our site, it does

enable us to continually improve our site, making it a better and more useful experience for you.

- The analytics service(s) used by our Site use(s) Cookies to gather the required information.
- You can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third-party cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.
- You can choose to delete Cookies at any time; however, you may lose any information that enables you to access our Site more quickly and efficiently, including, but not limited to, login and personalization settings.
- It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.
- Cookies we use for remarketing purposes include Google and Facebook.
- Google: We use Google cookies in order to be able to advertise using their remarketing platform. For more information on the privacy practices of Google, please visit the [Google Privacy & Terms](#).
- Facebook: Facebook™'s remarketing service is provided by Facebook Inc. We're also using cookies to serve You ads on Facebook™. You can alter Facebook™ Ads Display options and customize how you would like to view ads by visiting the [Facebook™ Privacy Policy](#).

## 8. Storage and transfer of personal data

Personal data will be stored on secure servers controlled and maintained in accordance with sufficient privacy safeguards. We may store or transfer information on Users to processors located outside of the United Kingdom and European Union, provided that such processors implement appropriate and suitable safeguards regarding the security of personal information.

If you register an account with us, we will store your personal data for as long as you have an active account. We may keep your personal data for up to a year after you deactivate the account in our backup to maintain our backup storage data integrity and address any appeals or requests pursuant to your purchases. We may store some personal data for more extended periods if required to do so by applicable law or under our prevailing legitimate interest.

## 9. User's Rights

We will process all personal data in accordance with the principles of GDPR and especially having in mind Users' rights, in particular their right, in certain circumstances, to:

- Request access to any data held about them by InnAIO in a commonly used and machine-readable format.
- Transmit their personal data to another data controller (free of charge), where such personal data is processed on the basis of consent or contractual performance unless in doing so, it would adversely affect the rights or freedoms of other Users or others, e.g., including trade secrets or intellectual property.
- Prevent the processing of their personal data or withdraw their consent at any time in certain circumstances.
- Ask to have inaccurate personal data amended.
- Erasure of their personal data where data is no longer required for the original purpose or where the User has withdrawn their consent, and no other lawful processing grounds apply.
- Object to the processing of their personal data in certain circumstances.
- Be notified where their personal data is subject to automated decision-making, i.e., profiling, including the logic involved, the significance and the envisaged consequence of such processing for the data subject, and object to such profiling in certain circumstances.

Where we are required to provide a copy of personal data, this will be free of charge; however, any further copies requested may be subject to a reasonable fee based on administration costs.

Where we stop processing personal data or delete the User's personal data, it will possibly mean that that particular User is unable to continue using or contributing to the provision of some of our Services, and they shall be notified accordingly.

Where you request us to rectify or erase (except data required by any legal obligations) your personal data or restrict any processing of such personal data, we may be required to notify certain third-parties to whom such personal data has been disclosed of such request.

## 10. Changes to the Privacy Policy

We reserve the right to change our Privacy Policy at any time. The current version of the Privacy Policy is available on the website, indicating the effective date in the heading. You are encouraged to check our Privacy Policy periodically.