

Privacy Policy

This Privacy Policy ("**Privacy Policy**") applies to the website accessible at www.vaiot.ai ("**Website**"), including VAIOT's newsletter ("**Newsletter**"), and the VAIOT platform ("**VAIOT Platform**") accessible via mobile applications. VAIOT Platform and the Website, collectively called the "**Service**," are all owned and operated by VAIOT Limited ("**VAIOT**"), a Private Limited Liability company incorporated under the laws of Malta in December 2018, registered at Cornerstone Business Center, Level 2, Suite 16th September Square Mosta MST 1180, under the Malta Business Registry number: C8974.

VAIOT is committed to protecting the privacy and security of your personal information. This Privacy Policy describes how we collect and use personal information collected about you via our Service. It also describes the choices available to you regarding the use of your access to, and how to update and correct your personal information.

Who is the controller of your personal information?

We value the right to privacy and strive to protect the personal data we collect and use in accordance with applicable data protection legislation and, more specifically, with the Regulation (EU) 2016/679 of 27 April 2016 (the "**GDPR**") and its relevant national implementing legislation.

As required by applicable data protection legislation, we inform you that we are (in most cases) the controller of the personal information we collect, receive, and otherwise process about you as described below. Such legislation includes and any other national or supranational statutory law applicable to us (together the "data protection legislation").

We may also act as a processor in specific circumstances where we receive strict and detailed instructions to process personal information on behalf of third parties. For any questions about our processing of personal information, you may contact us at the following address: privacy@vaiot.ai.

This notice is separated into the following sections for ease of use. If you have any questions about this notice or how we collect and use personal information about you, please feel free to contact us privacy@vaiot.ai.

- The information we collect about you;
- How we use the information we collect;
- Who we give your information to;
- Control of your information;
- Your access to your information and how long we keep it;
- How we protect your information;
- Newsletter;
- Rights regarding personal information.

Please read the following carefully to understand our views and practices regarding your personal information and how we will treat it. By engaging with the Website and the VAIOT Platform, you acknowledge you have read and understood this Privacy Policy. Data protection laws require companies to describe their role and responsibility, handling personal information.

Given the nature of our business and our related activities, it is difficult to provide an exhaustive description of all the personal information we process. The information set out herein is prepared on a "best efforts" basis, and we endeavor to provide you with as much detail as possible.

1. The information we collect about you

1.1. The lawful basis

As VAIOT wants to ensure the lawfulness of the personal data processing in accordance with GDPR (Article 6), it only processes personal data if:

1. the data subject has given consent to the processing of his or her personal data for one or more specific purposes (example: the Newsletter),
2. processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract,
3. processing is necessary for compliance with a legal obligation to which the controller is subject.

1.2. Information you give to us

You can provide us with information about yourself by filling in the relevant forms within the Service or by providing us such information by phone, email, during a video conference, at an in-person event, or in any other manner. This information includes personal data which was specified when registering within the Service, when subscribing or opening the account on the VAIOT Platform or subscribing to the newsletter, opening an account and verifying the identity of the account holder or persons authorized to use it, as well as the payment instruments used by a person, when searching for a product, using any of services provided by our Service, while placing orders on our Service, by participating in discussions or using any other communication functions on our Website, during participation in draws, promotions or surveys, and also when you tell us about problems or issues in the work of the Service. For example, the data that you provide us can include your last name and first name, your photos; your videos, your address; your nationality, your tax residency, your phone number; your e-mail address; your logins and nicknames, your date of birth; your education; your experience and place of work, your sources of income and their amount; information on the status of your accounts opened with banks or payment systems. Additionally, you can provide additional personal information to complete a profile within our system.

1.3. Information we collect about you from your use of our Service

We will automatically collect information from you each time you visit our Service. This includes technical information, information about geolocation, information about your visit, and information about your activity on our Service such as information searched and viewed, page response times, download errors, length of visit to certain pages, page interaction information (such as scrolling, clicks, and mouseovers), methods to browse to and away from a page, and methods used to contact our support team. Technical information may also include the Internet protocol address used to connect your computer to the Internet, your login information, browser type, and version, time zone setting, browser plug-in types and versions, operating systems, and device platform. Information collected could also include your email address once you decided to sign up for the Newsletter available at the Website.

1.4. Information we collect about you from third parties

We work closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

2. How we use the information we collect

2.1. Information you give to us

We use the personal information you provide us in a manner that is consistent with the present Privacy Policy. We use your personal information to provide services within our Service, including services arising from any obligations set forth in a contract between you and us. These services may include providing access to our VAIOT Platform, administration of your account, and notifying you of changes to our services or your account. This data will also be used to provide you with information you may have requested from us, including whitepapers, access to webinars, or the like. Once you sign up for the Newsletter, we may use your personal information to provide you with project and company information updates.

We also use your personal information together with other personally non-identifiable information to help us better understand our users, to personalize and improve your experience with our Service, and to improve the content and functionality of our Service. This may include providing information about our goods and services that we feel may interest you and enhance your interaction with our Service. We will communicate with you about these goods and services via email, direct mail, telephone, or via our Service. These communications may include newsletters, promotional emails, product updates, or market research requests. We will use your information for this purpose only if you have given your consent to receive marketing material from us at the point we collected your information, where required by law, or otherwise in our legitimate interests, provided these interests do not override your right to object to such communications.

2.2. Information we collect about you from your use of our Service

We will use this information in our legitimate interests (where we have considered these are not overridden by your rights), to administer our Service, and for internal operations, including troubleshooting, data analysis, testing, research, and statistical survey purposes. We will also use this information to keep our Service safe and secure, for measuring the effectiveness of how we present content and how we market and advertise. We use non-personally identifiable information in our log files to analyze trends, to administer our Service, to track users' movements in and around our Service, and to gather demographic information about our user base as a whole.

2.3. Information we receive from other sources

We will combine this information with the information you give to us and the information we collect about you in our legitimate interests (where we have considered that these are not overridden by your rights). We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

3. Disclosure of your information

We firmly believe that your personal information forms a crucial part of our relationship, and therefore, we do not sell, trade, or rent your personal information to third parties. However, in certain circumstances, we may share your personal information with certain third parties, as follows:

- **Agents, Consultants, and Related Third-Parties:** We sometimes hire other companies to perform certain business-related functions, such as sending emails on our behalf, or conducting market research. When we employ another company to perform a function of this nature, we only provide them with the information that they need to perform their specific function. These companies are not permitted to use any personal information that we share with them for any other purpose, aside from providing services to us. Each such relationship as described above, with any third party, is regulated with a contract regulating the matters of personal information handling, sharing, and processing;
- **Business Transfers:** As we develop our business, we might sell or buy businesses or assets. Your personal information may be transferred to a buyer or other successor in the event of a corporate sale, merger, reorganization, dissolution, or similar event in which personal information held by us about our Service users is among the assets transferred. You should be notified each time such a business transfer occurs.
- **Legal Requirements:** In certain situations, we may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We reserve the right to disclose your personal information as required by law and when we believe that disclosure is necessary to protect our rights or to comply with a judicial proceeding, court order, or similar legal process served on us or our Service.

We will take reasonable steps to ensure that we only collect that personal information that is relevant for the purposes for which it is to be used. Furthermore, we will not process your personal information in a way that is incompatible with these purposes.

3.1. More on sharing selected personal data with third-parties

VAIOT utilizes different service and solution providers for various, necessary business purposes. VAIOT ensures sharing personal data in compliance with data protection legislation. VAIOT engages a third party to handle, store, or otherwise use certain personal data as part of the contract between VAIOT and a third-party in which VAIOT requests certain services from the given third-party. VAIOT ensures that personal data is shared only for a good reason (e.g., to meet a contractual obligation). The individuals are hereby notified that their personal data may be shared with third parties for purposes described in point 2 of this Privacy Policy. VAIOT carefully considers all personal data sharing cases to share only the minimum amount of personal data necessary to achieve the purpose. Consideration has been given as to the length of the sharing arrangement and what will happen at the end of it. VAIOT carefully considers how to share the personal data securely, with a number of internal data protection procedures implemented. VAIOT ensures that the sharing has been documented in some way.

Examples of such data sharing at VAIOT are :

- VAIOT uses a cloud-based software service to operate the Newsletter. By subscribing to the Newsletter, the data subject agrees to data sharing with the company operating the cloud-based software service used by VAIOT.
- Using external accounting services, which requires sharing certain personal data
- Using cloud storage or other third party providers to store the personal data,
- Using a form hosted on a third party website to run a survey or collect information,
- Using a supplier to provide the Service to the users.

4. Controlling use of your personal information

When you register or otherwise give us personal information, we will not share that information with third parties without your permission, other than for the limited exceptions already listed. It will only be used for the purposes stated in this Privacy Policy. When we act as a data controller, we will act in accordance with your permission to offer you our services and as otherwise instructed by you. We will also give you the ability to opt-out before we disclose your personal information to a third party or use your personal information for purposes that are fundamentally different than the purpose for which it was originally created.

If you would like to discontinue receiving communications from us, you may update your email preferences by using the "Unsubscribe" link found in emails we send to you or on the Platform Preferences Dashboard located in your member profile on our Service or by contacting us at privacy@vaiot.ai. Please note that we may not include the opt-out information in e-mails that are transactional in nature and are not marketing

communications (i.e., e-mails concerning your order, the website's Terms of Use, etc.). You will not have the ability to opt-out of receiving transactional emails via the VAIOT Platform. If you have questions or concerns regarding a transactional e-mail, please contact us privacy@vaiot.ai.

5. Your access to your information and how long we keep it

Upon request, we will provide you with information about whether we hold, or process on behalf of a third party, any of your personal information. To request this information, please contact us at privacy@vaiot.ai.

We will provide you with the means to ensure that your personal information is correct and current. If you have registered to use the VAIOT Platform, we will provide a way for you to access and change your profile on our VAIOT Platform. We will also allow you to completely delete your profile along with all personal information associated with that profile. You may request deletion by accessing your profile and clicking on the link available there. Alternatively, you may contact us at privacy@vaiot.ai. We will respond to your request within a reasonable timeframe. Requesting deletion of your account means your personal information is permanently deleted and cannot be retrieved. Please note that If we delete your account, you will not be able to use our services anymore and will lose benefits connected to your existing account.

If you would like to view your personal information that we hold at any time, you'd need to contact us via privacy@vaiot.ai or view the personal information at your VAIOT platform account once it is created on the VAIOT Platform.

We retain your information while your account is active or as needed to provide you services. Thereafter, we will keep your personal information as long as necessary for satisfying the purposes for which it was collected, subject always to the legal periods of limitation and to the situations where the applicable laws require or allow that the personal information is retained for a certain period of time after the termination of the contractual or commercial relationship.

We may also keep and process personal information after the termination of our contractual and commercial relationship for specific purposes such as the compliance with legal and regulatory obligations or the establishment, exercise or defense of legal claims.

6. Use of cookies

We use cookies to enhance your experience within the Service and to improve the provision of our services. Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the website. VAIOT uses the information collected from cookies to evaluate the effectiveness of the Service, analyze trends, and administer the Service.

The Service uses cookies to distinguish you from other users of our Service. This helps us to provide you with a good and personalized user experience when you interact with our Service and also allows us to improve our Service.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our Service. They include, for example, cookies that enable you to log into secure areas of our Website, use a shopping cart, or make use of e-billing services.
- **Analytical/performance cookies.** They allow us to recognize and count the number of visitors and to see how visitors move around our Service when they are using it. This helps to improve the way our Service works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognize you when you return to our Service. This enables us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our Service, the pages you have visited and the links you have followed. We will use this information to make our Service and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

A number of cookies we use last only while you are on our Service and expire when you close your browser or exit our Service. Others are used to remember you when you return to our Service and will last for longer. We use these cookies on the basis that they are necessary for the performance of a contract with you, or because using them is in our legitimate interests (where we have considered that these are not overridden by your rights), and, in some cases, where required by law, where you have consented to their use

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

7. Changes to this Privacy Policy

Any changes we make to our Privacy Policy in the future will be posted on the Website and, where appropriate, notified to you by e-mail or otherwise. Please check back frequently to see any updates or changes to our Privacy Policy.

8. Information security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors, and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. Newsletter

Any data subject who is or is not a user of the Service and who may have received the Newsletter or any other type of marketing materials from VAIOT can, in any case, use the opt-out option in order not to receive this type of communication or invitations in the future.

In case you decide to opt-out of receiving our newsletters, news flashes, and/or other marketing communications, your contact details will be removed from our marketing distribution lists.

You are informed, however, that we may keep personal information about you in our database for purposes other than marketing and in accordance with this Privacy Policy.

VAIOT uses a cloud-based software solution from the external service provider to operate the Newsletter. By subscribing to the Newsletter, the data subject agrees to data sharing with the company operating the cloud-based software service used by VAIOT.

10. Rights regarding personal information

The GDPR and other applicable laws foresee certain rights for data subjects under the conditions set out therein. You, as a data subject, specifically have the following rights:

- Right to access your personal data;
- Right to rectification or correction of your personal data;
- Right to erasure of your personal data;
- Right to object or to request the restriction of processing of your personal data;
- Right to data portability;
- Right to object to profiling;
- The right to withdraw your consent for the future to the extent that the processing of your personal data takes place on the basis of your consent.

Data subjects also have the right to address any claim relating to our processing of personal information relating to them to the relevant data protection supervisory authority, in Malta the Information and Data Protection Commissioner.

Please familiarize yourself with VAIOT's Privacy Policy, which governs your use of VAIOT's Service and the terms of which are incorporated herein. Please let us know if you have any questions.

For any query, request or comment, please send your e-mail to privacy@vaiot.ai

Approved formula to be used within the Service: I acknowledge that I have read and agreed with the terms of the Privacy Policy, and I consent to the processing of my personal information by VAIOT in accordance with the VAIOT's Privacy Policy.