

Empiri Group Inc.
Privacy Policy

1. General

- 1.1. Welcome to the website of Empiri Group Inc. and its affiliates (together, the “**Company**”) at empiri.ai (the “**Website**”).
- 1.2. The purpose of this Privacy Policy (the “**Privacy Policy**”) is to reflect the processing of Personal Information carried out by the Company in connection with visitors to the Website, including the types of Personal Information, the purposes of processing, the parties with whom it may be shared, and the rights of data subjects in connection with Personal Information processed by the Company about them.
- 1.3. “**Personal Information**” means any data relating to an identified individual or an individual who can be identified, directly or indirectly, with reasonable effort; “**Processing of Personal Information**” means any operation performed on Personal Information, including its receipt, collection, storage, copying, review, disclosure, exposure, transfer, delivery, or granting access to it.
- 1.4. The Website is operated by the Company, which is the controller of information collected about visitors to the Website. The Company’s contact details are published on the Website.
- 1.5. Please read this Privacy Policy carefully before providing Personal Information to the Company. It is recommended that you do so from time to time because it may change (the date of the last update is stated in the heading). If you do not agree to the Privacy Policy, you must refrain from using the Website, including browsing the Website or contacting the Company. Taking any of the foregoing actions constitutes consent to the Privacy Policy.

2. Collection and Provision of Personal Information

2.1. Browsing the Website

- 2.1.1. Browsing the Website in and of itself does not involve providing Personal Information.
- 2.1.2. When browsing the Website, information collected automatically by website servers may be collected, such as the IP address from which the visitor accessed the Website.

2.2. Inquiries to the Company Through the Website

- 2.2.1. When contacting the Company through the Website (or through other contact means published on the Website), you will be asked to provide Personal Information including: first and last name, contact details (telephone number and email address), and information at your discretion concerning the purpose of the inquiry.
- 2.2.2. **For clarity: (1) You are not legally required to provide Personal Information to the Company, and any provision of Personal Information to the Company is subject to your wish and consent. However, in certain cases, failure to provide the information may prevent the Company from providing you with services or responding to your inquiries; (2) do not provide information about others without their consent, both to the provision of the information and to this Privacy Policy. If you choose to provide such information, you declare and confirm that you have obtained all relevant consents for providing the information or that you are authorized to do so under applicable law.**

3. Processing of Personal Information

3.1. The Company processes Personal Information for the following purposes:

- 3.1.1. Operation of the Website.
- 3.1.2. Providing customer service and responding to inquiries.
- 3.1.3. Managing the Company's business, including improving and optimizing the Website and the services.
- 3.1.4. Sales promotions, advertising, and marketing of promotions, products, and services offered by the Company and/or third parties with whom the Company has a business cooperation, including by direct marketing.
- 3.1.5. Enforcing the Company's procedures, including the Privacy Policy and the Terms of Use of the Website.
- 3.1.6. Generating aggregated, statistical, or other anonymous information for the Company's needs, including insights.
- 3.1.7. Information security and cybersecurity, including: identity verification and prevention, investigation of and response to security incidents and cyber incidents.
- 3.1.8. Preventing harm to the person or property of visitors, third parties, or the Company.
- 3.1.9. Compliance with applicable law, a judicial order, or a demand of a competent authority.
- 3.1.10. Protecting the legitimate interests of the Company, including managing legal proceedings and investigating matters, claims, and demands that could lead to legal proceedings.

3.2. **Advertising Messages**

- 3.2.1. The Company may from time to time send you messages that constitute "advertising messages" (as defined under applicable law), all subject to the conditions required by applicable law (including obtaining consent).
- 3.2.2. If you receive such messages by email, text message, fax, or automated dialing, you may at any time notify the Company that you refuse to receive them by contacting the Company through one of the contact methods set out below or in accordance with the instructions provided in the body of each message. For clarity, this does not prevent the Company from sending service messages, personal messages, and the like.

4. **Retention and Security of Information**

- 4.1. The Personal Information processed by the Company is held in its databases in accordance with applicable law.
- 4.2. The Company takes reasonable (logical, physical, and administrative) measures to secure the information. However, it is clarified that the ability to completely prevent information security incidents (including cyber incidents) is limited. Accordingly, the Company's responsibility is to take such measures and address incidents as required under applicable law. However, subject to taking such measures, the Company will not be liable for any damage (direct or indirect) caused by an information security incident or cyber incident.

5. **Transfer of Information to Third Parties**

The Company may share or disclose Personal Information to third parties in the following cases and for the following purposes:

- 5.1. With the consent of the data subject.

- 5.2. To third parties that provide services to the Company or provide services jointly with it. It is clarified that the transfer of information to providers will be subject to their being obligated to maintain confidentiality and secure the information and to use it solely for the provision of the services, except for the right to use the information for security purposes, to comply with applicable legal obligations, or to generate anonymous information to improve their services.
- 5.3. To third parties (including affiliated companies and business partners) in cases of cooperation or for the provision of complementary products and services.
- 5.4. For compliance with applicable law, a judicial order, or a demand of a competent authority.
- 5.5. Where the Company believes this will reduce the risk of harm to the person or property of data subjects, or to the person or property of another.
- 5.6. To protect the legitimate interests of the Company, including for purposes of managing (or preparing for) legal, regulatory, or economic proceedings to which the Company is a party or in which it has an interest.
- 5.7. To affiliated companies in cases of reorganization, a sale of ownership, a sale of business or assets, or in anticipation of entering into a transaction for any of the foregoing purposes.
- 5.8. In additional cases for purposes of carrying out the purposes of use set out in this Privacy Policy

6. Data Subjects' Rights

- 6.1. Under applicable privacy laws, every person may inspect the Personal Information processed by the Company about them, personally or through an authorized representative. The Company will honor requests for inspection unless there is a legal basis to deny them.
- 6.2. The procedures for inspection will be determined by the Company from time to time in accordance with applicable law, including applicable regulations.
- 6.3. Any person who has inspected the Personal Information processed by the Company about them and found that it is not accurate, complete, clear, or up to date is entitled to contact the Company with a request to correct or delete the information. The Company will honor requests for correction and deletion unless there is a legal basis to deny them.
- 6.4. Requests to inspect, correct, or delete information should be submitted in writing through one of the contact methods set out below. Requests will be answered within a reasonable time and no later than thirty days after receipt of the request.
- 6.5. A person whose request for inspection, correction, or deletion has been denied may seek remedies under applicable law.

7. Changes to the Privacy Policy

The Company reserves the right to update the Privacy Policy from time to time. In such case, the change will be published on the Website and will take effect upon publication (the date of the last update to the Privacy Policy will be stated in the heading).

8. Contact Us

You may contact the Company with any question regarding this Privacy Policy and also to exercise the rights of data subjects as described above, and the Company will make its best efforts to respond to the inquirer within a reasonable time:

By email: contact@empiri.ai

9. Governing Law and Venue

Use of the Website, including any matter relating to the Privacy Policy, shall be governed exclusively by the laws of the State of Delaware (without giving effect to references to other laws). The state and federal courts located in the State of Delaware shall have exclusive jurisdiction over any matter relating to the Site or the Terms of Use.