



# Privacy Policy

We value our user's trust.

## Our Privacy Values

Thank you for choosing to be part of our community at EyeCloud, Inc (“Company”, “we”, “us”, or “our”). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us at [support@eyecloud.ai](mailto:support@eyecloud.ai).

When you visit our website, mobile application, and use our services, you trust us with your personal information. We take your privacy very seriously. In this privacy policy, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy policy that you do not agree with, please discontinue use of our Sites or Apps and our services.

This privacy policy applies to all information collected through our website <https://www.openncc.com/> and/or any related services, sales, marketing or events (we refer to them collectively in this privacy policy as the "Services"). **Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.**

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## **1. WHAT INFORMATION DO WE COLLECT?**

*Personal information you disclose to us.* In Short: We collect personal information that you provide to us such as name, address, contact information, passwords and security data, and payment information.

We collect personal information that you voluntarily provide to us when registering at the Services or Apps, expressing an interest in obtaining information about us or our products and services, when participating in activities on the Services or Apps or otherwise contacting us.

The personal information that we collect depends on the context of your interactions with us and the Services or Apps, the choices you make and the products and features you use. The personal information we collect can include the following: Credentials. We collect passwords, password hints, and similar security information used for authentication and account access.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

## **2. HOW DO WE USE YOUR INFORMATION?**

In Short: We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.

We use personal information collected via our Services or Apps for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

Below are some definitions that will help you understand the roles and responsibilities of EyeCloud, Inc.:

- “data controller” means a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be used.
- “data processor”, in relation to personal information, means any person (other than an employee of the data controller) who processes the data on behalf of the data controller.

If you provide the data and the instructions, then you are the data controller and EyeCloud, inc. is the data processor.

If we determine the purposes for which we collect and use your personal information, the we are the Controller.

We use the information we collect or receive:

- To facilitate account creation and logon process. If you choose to link your account with us to a third-party account (such as your Google or Facebook account), we use the information you

allowed us to collect from those third parties to facilitate account creation and logon process for the performance of the contract.

- To send administrative information to you. We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.

- For other Business Purposes. We may use your information for other Business purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Services or Apps, products, marketing and your experience. We may use and store this information in aggregated and anonymized form so that it is not associated with individual end users and does not include personal information. We will not use identifiable personal information without your consent.

### **3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?**

In Short: We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfill business obligations.

We may process or share data based on the following legal basis:

- Contest: We may process your data if you have given us specific consent to use your personal information for a specific purpose.

- Legitimate Interests: We may process your data when it is reasonably necessary to achieve our legitimate business interests.

- Performance of a Contract: Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.

- Legal Obligations: We may disclose your information where we are legally required to do in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena(including in response to public authorities to meet national security or law enforcement requirements).

- Vital Interests: We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud,

situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

- Business Transfers. We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

- Third-Party Advertisers. We may use third-party advertising companies to serve ads when you visit the Services or Apps. These companies may use information about your visits to our Website(s) and other websites that are contained in web cookies and other tracking technologies in order to provide advertisements about goods and services of interest to you.

#### **4. HOW LONG DO WE KEEP YOUR INFORMATION?**

In Short: We keep your information for as long as necessary to fulfill the purposes outlined in this privacy policy unless otherwise required by law. We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this policy will require us keeping your personal information for longer than the period of time in which users have an account with us.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

#### **5. DO WE COLLECT INFORMATION FROM MINORS?**

In Short: We do not knowingly collect data from or market to children under 18 years of age. We do not knowingly solicit data from or market to children under 18 years of age. By using the Services or Apps, you represent that you are at least 18 or that you are the parent or guardian of

such a minor and consent to such minor dependent's use of the Services or Apps. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under age 18, please contact us at [support@eyecloud.ai](mailto:support@eyecloud.ai).

## 6. WHAT ARE YOUR PRIVACY RIGHTS?

**In Short:** In some regions, such as the European Economic Area, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.

In some regions (like the European Economic Area), you have certain rights under applicable data protection laws. These may include that right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please use the contact details provided below. We will consider and act upon any request in accordance with applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal.

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here:

[https://ec.europa.eu/newsroom/article29/item-detail.cfm?item\\_id=612080](https://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080)

### *Account Information*

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Log into your account settings and update your user account. Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with legal requirements.

Opting out of email marketing: You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list – however, we will still need to send you service-related emails that are necessary for the administration and use of your account. To otherwise opt-out, you may:

- Contact us using the contact information provided.
- Provide unsubscribe options for users in our email newsletters.

## **7. CONTROLS FOR DO-NOT-TRACK FEATURES**

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. No uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adapted that we must follow in the future, we will inform you about that practice in a revised version of this privacy policy.

## **8. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?**

In Short: Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information. California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third

parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with the Services or Apps, you have the right to request removal of unwanted data that you publicly post on the Services or Apps. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Services or Apps, but please be aware that the data may not be completely or comprehensively removed from our systems.

## **9. DO WE MAKE UPDATES TO THIS POLICY?**

In Short: Yes, we will update this policy as necessary to stay compliant with relevant laws.

We may update this privacy policy from time to time. The updated version will be indicated by an updated “Revised” data and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

## **10. HOW CAN YOU CONTACT US ABOUT THIS POLICY?**

If you have questions or comments about this policy, you may contact or post to: EyeCloud, Inc., Po Yuan, 171 Branham Lane, Suite 10 #243, SAN JOSE, CA 95136, United States

If you are a resident in the European Economic Area, the "data controller" of your personal information is EyeCloud, Inc.. EyeCloud, Inc. has appointed Timotei Redis to be its representative in the EEA. You can contact them directly regarding the processing of your information by EyeCloud, Inc., by email at [timotei.redis@eyecloud.ai](mailto:timotei.redis@eyecloud.ai), or by post to: AIKLOD International, Timotei Redis, P-ta Unirii nr 13, Et. M, Ap. Birou 13, Timisoara, Timis 300085, Romania



## **11.HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?**

Based on the laws of some countries, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please submit a request form by sending emails to the contact information provided above. We will respond to your request within 30 days.