

Teramot Privacy Policy

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Halley LLC (known as Teramot), together with its affiliates, and subsidiaries (“we,” “us,” “our”), is a global company that provides solutions that allow businesses to easily access their data to make informed decisions and stay ahead of the competition, helping them reach their full potential.

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1. USER

In short, by using our site, you agree to this privacy policy.

By accessing our Site, contacting us, and/or using our services, you become a TERAMOT user (“you”, “user”) and acknowledge and accept the currently Last Updated version of this Privacy Policy (“**Policy**”), as published by us in our Site, as a binding agreement in relation to the use of your data.

As a user, you acknowledge and agree to your obligation of reading this Policy in detail. Furthermore, you accept for any personal data you provide in our Site to be treated in accordance with this Policy. IF YOU DO NOT AGREE WITH THIS POLICY, PLEASE LEAVE THE WEBSITE.

2. SCOPE

In short, here you’ll find the details on how we will process your personal data. We will always do it in compliance with the law. If we received your data from our customers or as part of an interview, different terms may apply.

This Policy explains how we process personal data from you and other customers and visitors to our websites (“**Sites**”) and users of our services (“**Services**”) as a controller or business under applicable privacy laws.

We are committed to handling your data responsibly and in compliance with all relevant data protection regulations, including US regulations, GDPR and your applicable national laws. If you are a California resident, please review our **California Notice at Collection and Privacy Rights**.

When we collect personal data as a processor on behalf of business customers, we process personal data in accordance with our contract with them.

This Policy does not apply to the personal data of employees or job applicants or to information that is exempt under applicable laws. We may provide additional notices when needed to clarify our privacy practices in specific circumstances.

3. PERSONAL DATA WE COLLECT

In short, we collect the personal data you provide to us, the data we receive from third parties, and the data automatically collected when you access the Site.

While the personal data we collect varies depending upon your use of our Site, our Services, and our interactions with you, we may collect personal data from you (that you voluntarily provide to us introducing it in the Site), from third-party sources, and automatically in the following circumstances:

3.1. **Personal Data Collected Directly from You.** We may collect the following personal data from you:

3.1.1. **Contact Information.** When you “Book a Call” with us or contact us for support or other customer service requests, we maintain records of your

requests/ related communications. For example, when you use our Contact section, we may collect details, including your name, country, email address, and phone number. We usually won't, but may also collect your company, job title, and industry if you choose to provide them.

3.1.2. **Usernames and Passwords.**

3.1.3. **Communications.** We collect the information you provide, such as contact information and records of our communications.

3.1.4. **Usage Data.** your geographical location, usage sessions, time spent on the Site, frequency of use, etc.

3.1.5. **Transaction and Billing Information.** We collect information when you purchase a product or service from us (though we do not store any payment details).

3.1.6. **Surveys.** When you fill out a survey, we collect your response, which, depending on the type of survey, may include contact information and your satisfaction with a product or Service.

3.1.7. **Events.** We also collect personal data related to your registration for and participation in events we host or sponsor.

3.1.8. **Sweepstakes, contests, and promotions.** If you participate in sweepstakes, contests, and promotions that we offer, we might collect your name, age, country of residence, email address, and other registration information related to contests, sweepstakes, and promotions. In some jurisdictions, we must disclose the winners' names and other personal information.

3.1.9. **Image/video** recording and transcripts. Your image may be captured and/or recorded on video security/monitoring systems when you enter our premises, captured during marketing or public filming events/sessions, and/or audio-video recording and transcription during meetings.

3.1.10. **Other Information.** We may collect other personal data that you consent to or would reasonably expect based on the nature of the circumstances.

3.2. **Personal Data Collected from Third Parties.** We may collect personal data about you from third-party sources such as public databases, advisors and agents, affiliates and subsidiaries, Internet service providers, operating systems and platforms, data brokers and analytics providers, advertising and marketing companies, business partners, clients, social media platforms, or other third parties.

- 3.3. **Personal Data Collected Automatically.** When you visit our Sites or Services, we and third parties may collect personal data, including through the use of cookies, pixel tags, and other similar technologies such as:

3.3.1. **Device and Browsing Information.** When you visit our Site, we may collect information that may be considered personal data under certain laws, such as IP address (a number that permits us to identify your device), browser type, domain names, access times, date/time stamps, operating system, language, device type, unique or online identifier, Internet service provider, referring and exiting URLs, clickstream data, and similar device and browsing information.

3.3.2. **Activities and Usage.** We also collect activity information related to your use of the Site, such as information about links clicked, searches conducted, features used, items viewed, time spent on certain pages, your interactions with us, log file information, and other activity and usage information.

3.3.3. **Location Information.** We may also collect or derive general location information about you, such as through your IP address.

For more information please review [Section 8: Cookies and Other Tracking Mechanisms](#).

4. HOW WE USE PERSONAL DATA

In short, we process your personal data to provide, improve and administer our Services, communicate with you, for security and fraud prevention, and to comply with the Law. We may also process your information for other purposes with your consent.

Generally, we use personal data for the following purposes:

- 4.1. **Providing Services and Support.** To provide and operate our Site and Services, communicate with you about your use of the Services, provide troubleshooting and technical support, respond to your inquiries, fulfill your orders and requests, communicate with you, and for similar service and support purposes.
- 4.2. **Diagnosis.** To identify any potential problems (i.e., connectivity issues) that may arise on the Site and affect the Services.
- 4.3. **Communications.** To respond to your questions and fulfill your orders and requests; to send you communications that you have requested or that may interest you; and to notify you of changes to our Services.
- 4.4. **Analytics and Improvement.** To better understand how you access and use the Site and Services, and our other products and offerings, and for other research and analytical purposes, such as to evaluate and enhance our Site and Services and business operations, to develop our Site and Services and features, and for internal quality control and training

purposes. This includes supporting and developing AI-assisted data processing solely for analysis, with no human involvement in data.

- 4.5. **Customization and Personalization.** To tailor content, we may send or display it on the Site and Services, including offering location customization and personalized help and instructions, and to personalize your experiences otherwise.
- 4.6. **Marketing and Advertising.** We aim to send you information about our services, such as offers, promotions, newsletters, and any other information that you sign up to receive, as well as to manage, analyze, measure, and improve our advertising campaigns.
- 4.7. **Planning and Managing Events.** For event planning and management, including registration, attendance, connecting you with other event attendees, and contacting you about relevant events and Services.
- 4.8. **Research and Surveys.** To administer surveys and questionnaires, such as for market research or customer satisfaction purposes.
- 4.9. **Sweepstakes, contests, and promotions.** To facilitate your participation in sweepstakes, contests, and promotions, including communicating with you about your involvement in the sweepstake, contest, or promotion.
- 4.10. **Security and Protection of Rights.** To protect the Site and Services and our business operations; to prevent and detect fraud, unauthorized activities and access, and other misuse; where we believe necessary to investigate, prevent, or act regarding illegal activities, suspected fraud, situations involving potential threats to the safety or legal rights of any person or third party, or violations of our terms or this Policy.
- 4.11. **Legal Proceedings and Obligations.** We must comply with the law and our legal obligations, respond to legal processes, and deal with legal proceedings. For that reason, we will store any information collected from you for as long as necessary and will use the information you provided if requested by courts or national or international state entities that request it.
- 4.12. **Exercise of Data Protection rights.** We will process and analyze your data in relation to any relevant requests we receive to exercise your (or other user's) Right of Access, Right to Rectification, Right to Erasure (Right to be Forgotten), Right to Restriction of Processing, Right to Data Portability, Right to Object, Right to Not Be Subject to Automated Decision-Making and Profiling, and any other rights applicable under the relevant regulations.
- 4.13. **General Business and Operational Support.** Accounting, auditing, compliance, recordkeeping, and legal functions are related to the administration of our general business.
- 4.14. **Other Uses.** As authorized by you.

5. DISCLOSURES OF PERSONAL DATA

In short, we may share information in specific situations described in this section and/or with the following third parties.

In general, we disclose and make available personal data to third parties in the following ways:

- 5.1. **Corporate Affiliates.** We may disclose personal data to corporate affiliates as part of our global business operations and for purposes and uses that are consistent with this Policy.
- 5.2. **Processors and Service Providers.** We may disclose personal data to our service providers who perform services on our behalf, such as IT service providers, hosting providers, email service providers, chatbot providers, call centers, etc.
- 5.3. **Third Parties, Platforms, and Services.** We may disclose or make personal data available to third-party platforms and providers that we use to provide or make available certain features or portions of the Site and Services or as necessary to respond to your requests.
- 5.4. **Marketing & Advertising Networks.** We may share information you provide us with advertising networks, search engines, social media platforms, sponsors, and/or traffic measurement services, who use this data to improve and measure our ads' effectiveness and serve targeted ads to you on third-party websites and platforms. For more information, including how to opt out of interest-based advertising, see [Section 8: Cookies and Other Tracking Mechanisms](#) and [Section 11: Your Rights As A Data Subject](#) below.
- 5.5. **Third-Party Analytics Providers.** We may also engage third-party analytics companies to collect information about how you access and use our Site and Services, improve them, and for other research and analytical purposes.
- 5.6. **Compliance, governance, and legal requirements.** We may disclose personal data to comply with legal and compliance obligations and to respond to legal processes related to legal proceedings. For example, we may disclose personal data in response to subpoenas, court orders, and other lawful requests by regulators and law enforcement. We may also disclose information, including personal data, related to litigation and other legal claims or proceedings, for our internal accounting, auditing, compliance, recordkeeping, and legal functions. In addition, we may disclose the names of sweepstakes and contest winners in accordance with applicable law.
- 5.7. **Business Transfers.** We may disclose personal data as part of commercial transactions (e.g., mergers, acquisitions, bankruptcy, or other similar business transactions) and in contemplation of such transactions (e.g., due diligence).
- 5.8. **Business partners.** We may disclose your personal data with partners who are co-hosting or organizing an event with us, or that we understand in good faith that may offer you relevant products, services, or promotions.
- 5.9. **Other Disclosures.** We may disclose your personal data for other purposes, which we will notify you of and/or obtain your consent when required.

- 5.10. **Aggregate and/or Deidentified Data.** We may use and disclose aggregate, deidentified, and other non-identifiable data related to our business and the Services for quality control, analytics, research, development and other purposes. Where we use, disclose, or process deidentified data we will maintain and use the information in deidentified form and not to attempt to reidentify it except where permitted by law.

6. INTERNATIONAL DATA TRANSFER

In short, we may transfer, store, and process your information in countries, other than your own.

Our servers are located in the United States. If you are accessing our Site from a different country, please be aware that your information may be transferred to, stored by, and processed by us in our facilities and in the facilities of the third parties with whom we may share your personal information (see [Section 5: Disclosures of Personal Data](#) above),

Given our international presence, your personal data may be transferred within and out of the European Economic Area (EEA). Any international transfers of your personal information will comply with applicable laws and regulations regarding personal data protection and complying with all legal confidentiality and security obligations. Your personal data will not be shared with any third parties that do not have authorization for their processing.

To efficiently provide services, some of our service providers (data processors) are located in countries outside the EEA, or if they are located in the EEA, they may share information with entities outside the EEA.

When we transfer personal data outside of the EEA, to be processed by companies hired by us or our affiliates or subsidiaries, we will comply with the EU General Data Protection Regulation and all applicable data transfer regulations. Specifically, all data transfers will comply with appropriate safeguards.

7. LEGAL BASIS

In short, we only process your personal information when we believe it is necessary and we have a valid legal reason (i.e., legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfill our contractual obligations, to protect your rights, or to fulfill our legitimate business interests.

If you are located in the EU or UK, this section applies to you.

We are entitled to use your personal data based on (i) our legitimate interest, such as for research and development, to market and promote our Services, to protect our legal rights and interests, to comply with our obligations to provide a service under a contract, to the extent that your interests or your fundamental rights are not overridden; (ii) your consent to do so for a specific purpose; or (iii) to process your data to comply with a legal obligation.

In legal terms, we are generally the "data controller" under European data protection laws of the personal information described in this Policy, since we determine the means and/or purposes of

the data processing we perform. This Policy does not apply to the personal information we process as a "data processor" on behalf of our customers. In those situations, the customer with that we provide services and with whom we have entered into a data processing agreement is the "data controller," responsible for your personal information, and we merely process your information on their behalf in accordance with your instructions. If you want to know more about our customers' privacy practices, you should read their privacy policies and direct any questions you have to them.

If you are located in Canada, this section applies to you.

We may process your information if you have given us specific permission (i.e., express consent) to use your personal information for a specific purpose, or in situations where your permission can be inferred (i.e., implied consent). You can withdraw your consent at any time.

In some exceptional cases, we may be legally permitted under the applicable law to process your information without your consent, including, for example if it is clearly in your interest and your consent cannot be obtained in a timely way, for investigations and fraud detection and prevention, if it is contained in a witness statement and the collection is necessary to assess, process, or settle an insurance claim, etc.)

8. COOKIES AND OTHER TRACKING MECHANISMS

In short, we may use cookies and other tracking technologies to collect and store your information.

We and other third parties use cookies, pixel tags, and other similar tracking mechanisms to automatically collect information about browsing activity, device type, and similar information within our Site and Services.

We use this information to, for example, analyze and understand how you access, use, and interact with our Site and Services; to identify and resolve bugs and errors in our Site and Services; to assess, secure, protect, optimize, and improve the performance of our Site and Services; for marketing, advertising, measurement and analytics purposes; and to personalize content on our Site and Services.

We may also deidentify or aggregate such information to analyze trends, administer our Site and Services, and gather broad demographic information for aggregate uses and for any other lawful purpose.

“**Cookies**” are alphanumeric identifiers used for tracking purposes. Some cookies allow us to make it easier for you to navigate, while others are used to enable a faster log-in process, support the security and performance of the Site, or allow us to track activity and usage data within the Site and across websites.

“**Pixel tags**” (sometimes called web beacons or clear GIFs) are tiny graphics with a unique identifier, similar in function to cookies. We may use these tracking technologies to understand users’ activities, help manage content, and compile usage statistics, and in emails to let us know

when they have been opened or forwarded so we can track response rates and gauge the effectiveness of our communications.

Third Party Analytics. We use third-party tools, such as Google Analytics, which are operated by third-party companies to evaluate usage of our Site. These third-party analytics companies use cookies, pixels, and other tracking technologies to collect usage data about our Site to provide us with reports and metrics that help us evaluate usage of our Site, improve our Site, and enhance performance and user experience.

To learn more about Google's privacy practices, please review the Google Privacy Policy at <https://www.google.com/policies/privacy/partners/>. You can also download the Google Analytics Opt-out Browser Add-on to prevent your data from being used by Google Analytics at <https://tools.google.com/dlpage/gaoptout>.

9. HOW DO WE KEEP YOUR INFORMATION SAFE?

In short, we aim to protect your personal information through a system of organizational and technical security measures, however, there is always a risk.

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personal data, we cannot guarantee or warrant the security of any information collected through our Site and Services. You use our Site and Services and provide us with your personal data at your own risk.

10. HOW LONG WE RETAIN YOUR PERSONAL DATA

In short, we keep your information for as long as necessary to fulfill the purposes outlined in this Policy unless otherwise required by law.

Your personal data will be retained until it is no longer needed to fulfill the purposes and uses for which it was collected, as outlined in this Policy. If you request we delete your personal data from our databases, please note that we may still retain it as necessary to comply with our legal obligations and regulatory requests, resolve disputes, and enforce our agreements.

For information received from our clients, we generally (unless otherwise agreed directly with them) reserve the right to retain it for a period of 10 years and/or until the purpose for processing it is completed. After the specified period, we will destroy the Personal Data.

11. YOUR RIGHTS AS A DATA SUBJECT

In short, depending on your state of residence in the US or in some regions, such as the European Economic Area (EEA), United Kingdom(UK), Switzerland, and Canada, 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, depending on your country, province, or state of residence.

You may exercise your Right of Access, Right to Rectification, Right to Erasure (Right to be Forgotten), Right to Restriction of Processing, Right to Data Portability, Right to Object, Right to Not Be Subject to Automated Decision-Making and Profiling, and any other rights applicable under the relevant regulations by sending a letter to our address as outlined below ([Section 5: Disclosures of Personal Data](#)) or by emailing our Data Privacy Officer, Federico Ceccatto [federico@teramot.com].

In case we need to verify your identity, we may require you to send us a copy of a valid government-issued identification document.

If you consider your request has not been properly responded to, you may file a complaint with the competent authority. However, we recommend that prior to filing any complaint with the competent authority, you reach out to our Data Protection Officer by sending an email to [privacy@teramot.com] in order to review the specific situation and try, if possible, to find an amicable and efficient solution.

12. PERSONAL DATA OF MINORS

In short, we provide a general audience Site. The Site is not designed for minors, and they must refrain from using the Site. We do not knowingly collect personal data from minors.

This Site is not directed at minors, and if minors gain access to it, their use must be supervised by their parents, guardians, or legal representatives.

The Site is only allowed for those who are of legal age to enter into contracts and are not legally restrained or in any way prohibited from exercising legal acts, rights, and/or obligations. Given this, minors are not allowed to access the Site nor to provide any Personal Data or any other type of information

13. EXTERNAL LINKS

In short, we are not responsible for the safety of any information that you share with third parties that we may link to or who advertise on our Site.

Our Sites and Services could contain links to third-party websites or features. Access to and use of such linked websites or features is not governed by this Policy but by the privacy policies of those third parties. We are not responsible for the information practices of such third parties, including their collection of your personal data. You should review the privacy policies and terms for any third-party websites before proceeding to those websites or using those features.

14. CALIFORNIA NOTICE AT COLLECTION AND PRIVACY RIGHTS

In short, these terms that apply to you if you are a California resident.

This section of the Policy (the “**California Privacy Notice**”) provides additional information for California residents and describes our information practices pursuant to applicable California

privacy laws, including the California Consumer Privacy Act and the regulations issued thereto, each as amended (the “CCPA”).

In this section, “**Personal Information**” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household. This section does not address or apply to our handling of publicly available information or Personal Information that is otherwise exempt under the CCPA.

- 14.1. **Categories of Personal Information Collected and Disclosed.** The following table identifies the categories of Personal Information we may collect about you (and may have collected in the prior 12 months), as defined by the CCPA, as well as the categories of third parties to whom we may disclose this information for a business or commercial purpose. Depending on how you use the Services, we may collect and disclose the following categories of Personal Information. For more information, please see Section 4: How We Use Personal Data & Section 5: Disclosures of Personal Data above.

Personal Information Collected		Third Party Disclosures for Business or Commercial Purposes
Categories	Description	
Identifiers	Includes name, alias, address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address, or similar information.	• advisors and agents • government entities and law enforcement • affiliates and subsidiaries • advertising networks • data analytics providers • social networks • internet service providers • operating systems and platforms • business customer/client • others as permitted or required by law (such as disclosures of sweepstake and contest winners)

	Also includes identifiers such as passport number, drivers' license or local identification card number.	● advisors and agents ● government entities and law enforcement ● affiliates and subsidiaries ● others as permitted or required by law
Categories of Personal Information Described in Cal. Civ. Code § 1798.80	Includes records containing Personal Information, such as name, product reviews, address and telephone number.	● advisors and agents ● government entities and law enforcement ● affiliates and subsidiaries ● internet service providers ● operating systems and platforms ● business customer/client ● others as permitted or required by law
Commercial Information	Includes products or Services purchased, obtained, or considered, or other purchasing or use histories or tendencies.	● advisors and agents ● government entities and law enforcement ● affiliates and subsidiaries ● advertising networks ● data analytics providers ● social networks ● internet service providers ● operating systems and platforms ● business customer/client ● others as permitted or required by law

Internet or Other Electronic Network Activity Information	Includes information regarding your use of our Site such as browsing history, clickstream data, search history, and information regarding interaction with our Sites, advertisements, including access logs and other activity information related to the use of our Services.	• advisors and agents • government entities and law enforcement • affiliates and subsidiaries • advertising networks • data analytics providers • social networks • internet service providers • operating systems and platforms • business customer/client • others as permitted or required by law
Geolocation Data	Includes general location information about a particular individual or device	• advisors and agents • government entities and law enforcement • affiliates and subsidiaries • internet service providers • operating systems and platforms • others as permitted or required by law
Audio, Electronic, Visual, Thermal, or Similar Information	Includes audio, electronic, visual, thermal, olfactory, or similar information such as, photographs and images (e.g., that you provide us) and call recordings (e.g., of customer support calls).	• advisors and agents • government entities and law enforcement • affiliates and subsidiaries • others as permitted or required by law

Characteristics of Protected Classifications	Includes characteristics of protected classifications under California and federal laws such as date of birth, gender, national origin, citizenship.	● advisors ● government entities and law enforcement ● affiliates and subsidiaries ● internet service providers, operating systems and platforms ● data analytics providers ● others as permitted or required by law
Profiles and Inferences	Includes inferences drawn from other Personal Information that we collect to create a profile reflecting an individual's preferences	● advisors and agents ● government entities and law enforcement ● affiliates and subsidiaries ● advertising networks ● data analytics providers ● social networks ● internet service providers ● operating systems and platforms ● business customer/client ● others as permitted or required by law
Sensitive Personal Information	Includes precise geolocation, passport number, driver's license or identification card number, age and gender.	● advisors and agents ● government entities and law enforcement ● affiliates and subsidiaries ● internet service providers

		• others as permitted or required by law
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- 14.2. **Sale and Sharing of Personal Information.** Additionally, the CCPA defines "sale" as disclosing or making available to a third-party Personal Information in exchange for monetary or other valuable consideration, and "sharing" includes disclosing or making available Personal Information to a third party for purposes of cross-contextual behavioral advertising.

While we do not disclose Personal Information to third parties in exchange for monetary compensation, we may disclose the following categories of Personal Information: identifiers, profiles and inferences, and internet or other electric network activity information to third-party advertising networks, analytics providers, and social networks for purposes of marketing and advertising.

We do not sell or share Sensitive Personal Information, nor do we sell or share any Personal Information about individuals who we know are under sixteen (16) years old.

- 14.3. **Sources of Personal Information.** As further described in Section 3: Personal Data We Collect, we collect Personal Information from the following sources: directly from you; advertising networks; data analytics providers; social networks; internet service providers; operating systems and platforms; affiliated entities; and government entities.

- 14.4. **Retention.** We retain the Personal Information we collect only as reasonably necessary for the purposes described above or otherwise disclosed to you at the time of collection. We retain Personal Information as necessary to comply with our tax, accounting and recordkeeping obligations, to provide you with the services you have requested, as well as an additional period of time as necessary to protect, defend or establish our rights, defend against potential claims, and comply with our legal obligations. In some cases, rather than delete your Personal Information, we may deidentify or aggregate it and use it in compliance with the CCPA.

- 14.5. **Purposes for Collecting, Using, Disclosing, and Processing Personal Information.** As more fully described in the Section 4: How We Use Personal Data, we collect, use, and otherwise process the above categories of Personal Information to provide our Services to you, respond to and fulfill your requests, as otherwise directed or consented to by you, and for the following business and commercial purposes: to provide Services and support, communications, analytics and improvement, customization and personalization, marketing and advertising, events, research and studies, security and the protection of rights, legal proceedings and obligations, and general business and operational support.

- 14.6. **Sensitive Personal Information.** We do not use or disclose of Sensitive Personal Information beyond the purposes authorized by the CCPA.

- 14.7. **California Residents Rights.** The CCPA provides you with certain rights regarding your Personal Information. Please note that these rights are subject to certain conditions and exceptions.
- 14.8. **Right to Know/Request Access.** With respect to the Personal Information we have collected about you in the prior twelve (12) months, you have the right to know:
- 14.8.1. The categories of Personal Information we collected about you;
 - 14.8.2. The categories of sources from which we collected your Personal Information;
 - 14.8.3. The business or commercial purposes for collecting, selling, or sharing your Personal Information;
 - 14.8.4. The categories of third parties to whom we have disclosed your Personal Information; and
 - 14.8.5. The specific pieces of your Personal Information we have collected.
- 14.9. **Right to Delete.** You have the right to request we delete your Personal Information.
- 14.10. **Right to Correct.** You have the right to request that we correct inaccuracies in your Personal Information.
- 14.11. **Right to Opt-Out of Sales and Sharing.** You have the right to opt-out of “sales” and “sharing” of your Personal Information, as those terms are defined under the CCPA.
- 14.12. **Right to Limit Use of Sensitive Personal Information.** We do not engage in uses or disclosures of “Sensitive Personal Information” that would trigger the right to limit use of Sensitive Personal Information under the CCPA.
- 14.13. **Right to Non-Discrimination.** We will not discriminate against you for exercising any of the rights described in this section.
- 14.14. **Exercising Your Rights.** If you are a California resident and would like to exercise your CCPA rights, you may do so via any of the methods described below:
- Calling us at 1-800-921-2240
 - Emailing us at [privacy@teramot.com]
- 14.15. **Verification.** Before responding to your request, we must first verify your identity using the Personal Information you recently provided to us. We will take steps to verify your request by matching the information you provided with the information we have in our records. In some cases, we may request additional information in order to verify your identity, or

where necessary to process your request. If we are unable to verify your identity after a good faith attempt, we may deny the request and, if so, will explain the basis for the denial.

- 14.16. **Authorized Agents.** You may designate someone as an authorized agent to submit requests and to act on your behalf. Authorized agents will be required to provide proof of their authorization. We may also require that the relevant consumer directly verify the authorized agent's identity and authority.

15. BRAZILIAN PRIVACY STATEMENT

In short, *these terms that apply to you if you are a located in Brazil resident.*

Data collected and/or processed in Brazil, or other data processed in relation to people and/or Services located in Brazil, shall be also subject to the provisions of Brazilian General Data Protection Law (Law nr. 13.709/2018 – Lei Geral de Proteção de Dados Pessoais or LGPD). Any requests regarding data protection in Brazil shall be directed to the email [privacy@teramot.com]. Our person “in charge” (encarregado, in accordance with Art. 41, §1º, LGPD) is Federico Ceccatto.

16. WILL WE MAKE CHANGES TO THIS POLICY?

In short, *Yes, update this notice as necessary to stay compliant with relevant laws.*

If we change or update our Policy, we will post those changes on this page. Your continued use of the Site and Services is subject to our most up-to-date Policy, posted here. If we make any material changes, we may notify you by means of a notice on our Site.

17. CONTACT US

In short, *contact us at [privacy@teramot.com]*

For us, your data privacy is very important. If you have questions or concerns regarding the way in which your personal data is being processed or this Policy, please email us at [privacy@teramot.com] or via the contact information below:
Halley LLC. [25SW 9th St, Suite 406, Miami, FL, 33130].