

PRIVACY POLICY

Effective day 25 May 2023

1. PURPOSE AND SCOPE

1.1 At Smartnova, we respect your privacy and data protection rights and recognize the importance of protecting the personal data we collect and process. This Privacy Policy is designed to help you to understand what personal data we collect about you and how we use and share it.

1.2 When we refer to Smartnova, we mean Smartnova Limited, a company registered in Cyprus with a registered address at Avlonos 1, Maria House, Nicosia, 1075, CYPRUS ("**Smartnova**", "**we**", "**us**", "**our**").

1.3 This Privacy Policy applies to you if you:

- interact with any of Smartnova's websites (including www.smartnova.world and www.novatalks.ai) or our social media pages (collectively, the "Sites") ("**website users**");
- use Smartnova's communication and messaging products, and our other applications and services (collectively, the "**Smartnova Services**") ("**customers**");
- are a marketing prospect, who is anyone whose data Smartnova processes for the purposes of assessing customer eligibility ("**marketing prospect**"); or
- receive marketing communications from Smartnova.

1.4 For the purposes of the General Data Protection Regulation (or any successor or equivalent legislation in the UK) ("**GDPR**"), Smartnova is the controller of your personal data.

2. PERSONAL DATA COLLECTED BY SMARTNOVA

2.1 PERSONAL DATA WE COLLECT AND RECEIVE

The personal data that we collect about you broadly falls into the categories set out in the following table. Some of this information you provide voluntarily when you interact with the Smartnova Services and Sites. Other types of information may be collected automatically from your device, such as device data and service data. From time to time, we may also receive personal data about you from third party sources (as further described).

We may collect the following personal data about:

- **our website users;**
- **recipients of marketing communications; and**
- **marketing prospects.**

Registration, contact, and company information:

- first and last names;
- email addresses;

- phone numbers;
- company name;
- your role in your company.

Payment information:

- credit card information (anonymized);
- billing and mailing addresses;
- other payment-related information.

Device data:

- operating system type and version number, manufacturer and model;
- browser type;
- screen resolution;
- IP address;
- unique device identifiers.

Service data:

- the website you visited before browsing to the Smartnova Services;
- how long you spent on a page or screen;
- how you interact with our emails;
- navigation paths between pages or screens;
- date and time;
- pages viewed;
- links clicked.

Third party source data:

- profile information gathered from social networking sites;
- information that you have viewed or interacted with our content;
- company information;
- job titles;
- avatars;
- email addresses;
- phone numbers;
- addresses;
- approximate geolocation data.

The sources of this third party personal data may include:

- contact enrichment and lead generation providers; and
- targeted online advertising providers.

We may collect the following personal data about our customers:

Registration and contact information:

- first and last names;
- email addresses;
- phone numbers;
- mailing addresses;
- company name;
- your role in your company.

Payment information:

- credit card information;
- billing and mailing addresses;
- other payment-related information.

Device data:

- operating system type and version number, manufacturer and model;
- browser type and language;
- screen resolution;
- IP address;
- unique device identifiers.

Service data:

- the website you visited before browsing to the services;
- how long you spent on a page or screen;
- navigation paths between pages or screens;
- session date and time; activity status (including first seen, last seen, last heard from - and last contacted);
- pages viewed;
- links clicked;
- language preferences
- tags applied within customer accounts
- Smartnova assigned user identifier.

Third party source data

- profile information gathered from social networking sites;
- information that you have viewed or interacted with our content;
- company information;
- job titles;

- avatars;
- email addresses;
- phone number;
- approximate geolocation data.

The sources of this third party personal data may include:

- Our identity resolution and insight management provider; and
- Our geolocation IP intelligence provider

2.2 COOKIES AND OTHER TRACKING TECHNOLOGIES

Some device data, service data and third party source data is collected through the use of first or third party cookies and similar technologies. Smartnova does assign each user a unique user ID within the scope of an individual website, but does not collect or retain IP or any information that would allow Smartnova to identify the same particular user on more than one website.

Do Not Track. Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" or similar signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

3. HOW AND WHY WE USE YOUR PERSONAL DATA

3.1 We collect and process your personal data for the following purposes and, if you are from the European Economic Area (EEA), the UK or Switzerland, on the following legal bases:

- **Providing and facilitating delivery of the Smartnova Services and Sites:** We process your personal data to perform our contract with you for use of our Services and Sites and to fulfill our obligations under applicable terms of service. Where we have not entered into a contract with you, we process your personal data in reliance on our legitimate interests to operate and administer the Smartnova Services and Sites. For example, to create, administer and manage your account.
- **Communicating with you about the Smartnova Services and providing customer support:** We may send you service, technical and other administrative messages in reliance on our legitimate interests in administering the Smartnova Services. For example, we may send you messages about the availability or security of the Smartnova Services. We also process your personal data to respond to your comments and questions and to provide customer care and support.
- **Improving the Smartnova Services and Sites:** We process your personal data to improve and optimize the Smartnova Services and Sites and to understand how you use the Smartnova Services and Sites, including to monitor usage or traffic patterns and to

analyze trends and develop new products, services, features and functionality in reliance on our legitimate interests.

- **Sending marketing communications:** We may process your personal data to send you marketing communications via email, post or SMS about our products, services and upcoming events that might interest you in reliance on our legitimate interests or where we seek your consent. Please see the "Your Privacy Rights and Choices" section below to learn how you can control your marketing preferences.
- **Maintaining security of the Smartnova Services and Sites:** We process your personal data to control unauthorized use or abuse of the Smartnova Services and Sites, or otherwise detect, investigate or prevent activities that may violate Smartnova policies or applicable laws, in reliance on our legitimate interests to maintain and promote the safety and security of the Smartnova Sites and Services.
- **Displaying personalized advertisements:** We process your personal data to advertise to you and to provide personalized information, including by serving and managing advertisements on our Sites and on third party sites, in reliance on our legitimate interests to support our marketing activities and advertise our products and services or, where necessary, to the extent you have provided your consent.
- **Carrying out other legitimate business purposes:** including invoicing, audits, fraud monitoring and prevention.
- **Complying with legal obligations:** We process your personal data when cooperating or complying with public and government authorities, courts or regulators in accordance with our obligations under applicable laws and to protect against imminent harm to our rights, property or safety, or that of our users or the public, as required or permitted by law.

3.2 In certain circumstances, we may collect your personal data on a different legal basis. If we do, or if we use your personal data for purposes that are not compatible with, or are materially different than, the purposes described in this notice or the point of collection, we will explain how and why we use your personal data in a supplementary notice at or before the point of collection. Where we refer to legal bases in this section we mean the legal grounds on which organizations can rely when processing personal data.

3.3 Please note these legal bases only apply to you if you are resident in the EEA, the UK or Switzerland.

3.4 If you have any questions about our legal bases for processing your personal data, please contact us via following email support@novatalks.ia

4. SHARING YOUR PERSONAL DATA

4.1 We may disclose some or all of the personal data we collect to the following third parties:

Service Providers:

Consultants and vendors engaged by us to support our provision of the Smartnova Services and Sites and the operation of our business.

Advertising Partners:

Third party advertising companies may use cookies and similar technologies to collect information about your activity on the Smartnova Services and other online services over time to serve you online targeted advertisements, including the companies listed in the third-party cookies section of our Cookie Policy.

Professional Advisors:

Professional advisors, such as lawyers, auditors and insurers, in the course of the professional services that they render to us.

Compliance with Law Enforcement:

- Comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities;
- Protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- Enforce the terms and conditions that govern the Services; and
- Prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

4.2 **Aggregated or anonymized information.** We may also share aggregated or anonymized information with third parties for other purposes. Such information does not identify you individually, but may include usage, viewing and technical information such as the websites you generally use, the configuration of your computer, and performance metrics related to the use of websites which we collect through our technology, products and services. If we are required under applicable law to treat such information as personal data, then we will only disclose it as described above. Otherwise, we may disclose such information for any reason.

4.3 **Third party websites.** The Sites may also contain links to third party websites. This Privacy Policy applies solely to information processed by us. You should contact the relevant third party websites for more information about how your personal data is processed by them.

5. RETENTION OF YOUR PERSONAL DATA

5.1 We retain your personal data only for as long as necessary to fulfill the purposes set out in this Privacy Policy.

5.2 Note that content you post may remain on the Sites even if you cease using the Sites or we terminate access to the Sites.

6. TRANSFERS OF YOUR PERSONAL DATA

6.1 The Smartnova Services and Sites, are provided and hosted in EU. If you are located outside EU, we may transfer, and process, your personal data outside of the country in which you are resident to our service providers including to, the UK, Ukraine and other such countries as we deem appropriate from time to time. These countries may not have equivalent privacy and data protection laws (and, in some cases, may not be as protective). We will protect your personal data in accordance with this Privacy Policy wherever it is processed.

6.2 Certain recipients (our service providers and other companies) who process your personal data on our behalf may also transfer personal data outside the country in which you are resident. Where such transfers occur, we will make sure that an appropriate transfer agreement is put in place to protect your personal data.

6.3 Smartnova reserves the right to disclose and the Customer hereby agrees for the disclosure and transfer its Personal Data and other information relating to the Customer to Service Provider (including Sub-processors) such as hosting, credit card processing, customer/support services, e-mail, text messages, push notifications providers and others. On your request we can provide you with a list of entities which may have access to your Personal Data. We ensure these entities have access only to the minimum part of the Personal Data which is necessary for the proper Service provision.

7. SECURITY

We guarantee that we take reasonable and appropriate technical and operational measures to protect your personal data we collect and hold them from loss, misuse and unauthorized access, disclosure, alteration, and destruction. While processing personal data we take into due account the risk involved in the processing and the nature of the personal data.

8. YOUR PRIVACY RIGHTS AND CHOICES

8.1 Depending on your location and subject to applicable laws, you may have certain data protection rights. If you are a resident of the EEA or the UK you have the following data protection rights:

- If you wish to access, correct, update or request deletion of your personal data, you can do so at any time.
- You can object to processing of your personal data, ask us to restrict processing of your personal data or request portability of your personal data.

- You have the right to opt-out of marketing communications we send you at any time. If you no longer wish to receive our newsletter and promotional communications, you may opt-out of receiving them by clicking on the "unsubscribe" or "opt-out" link in the communications we send you. Please note, however, that it may not be possible to opt-out of certain service-related communications. You can let us know at any time if you do not wish to receive marketing messages by contacting us on email support@novatalks.ai.
- Similarly, if we have collected and process your personal data with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your personal data. For more information, please contact your local data protection authority.

8.2 You can exercise any of these rights by sending a request to our email support@novatalks.ai.

8.3 You can also exercise control over the following uses of your information:

- Opt-Outs. We will provide you with an opportunity to opt-out of having personal data used for certain purposes when we ask for this information. If you decide to opt-out, we may not be able to provide certain features of our offerings. You can revoke your consent at any point by contacting us using the procedure indicating in clause 8.2.

9. CHILDREN'S PRIVACY

Our Services and Sites are not intended for use by anyone under the age of 16. Smartnova does not knowingly collect personal data from anyone under the age of 16. If you are under 16, you may not attempt to register for our Services or send any information about yourself to us, including your name, address, telephone number, or email address. If we become aware that we have collected personal data from someone under the age of 16 without verification of parental consent, we will delete that information promptly. If you are a parent or legal guardian of a child under 16 and believe that a child has provided us with their personal data, please contact us at the email or mailing address provided in clause 8.2.

10. CHANGES TO THIS NOTICE AND QUESTIONS

10.1 We may amend this Privacy Policy from time to time in response to changing legal, technical or business developments. When we update it, we will take appropriate measures to

inform you, consistent with the significance of the changes we make. If we make material updates to this Privacy Policy we will update the effective date at the top of the Privacy Policy.

10.2 If you have any questions, comments or concerns about this Privacy Policy or the way your personal data is being used or processed by Smartnova, please submit any questions, comments or concerns using the procedure described in clause 8.2.