

WEBSITE PRIVACY POLICY

Last Modified: 10/24/2024

1. Introduction

1.1 Purpose of the Policy

This Privacy Policy outlines how AirMemo Inc. (“Company,” “we,” “our,” or “us”) collects, uses, discloses, and protects the personal information of users who access or interact with our website <https://www.AirMemo.com> (the “Website”) and any related services, including but not limited to the AirMemo application. We are committed to protecting your privacy and ensuring that your personal data is handled in a transparent and secure manner in accordance with applicable data protection laws, including but not limited to the **General Data Protection Regulation (GDPR)**, the **California Consumer Privacy Act (CCPA)**, and any other relevant privacy regulations.

This Privacy Policy is designed to help you understand:

- What information we collect and why.
- How we use and share that information.
- The choices you have regarding your personal data.
- How we protect your data and your privacy rights.

By using the Website or providing personal information to us, you agree to the collection, use, and disclosure of your information as outlined in this Privacy Policy. If you do not agree with this Privacy Policy, you should not use the Website or provide any personal information to us.

1.2 Scope of the Policy

This Privacy Policy applies to:

- **Website Visitors:** Individuals who browse or interact with our Website without registering or signing up.
- **Newsletter Subscribers:** Individuals who voluntarily provide personal information (e.g., email address) to receive newsletters, marketing, or promotional materials.
- **Application Users:** Employees or authorized users who access the AirMemo application through web-based or mobile platforms as part of their company's subscription to our services.

This Privacy Policy covers personal information collected via the Website, including any associated features or tools (such as forms or cookies), as well as personal information collected through other interactions with AirMemo Inc., such as customer support requests or marketing communications.

For users of the AirMemo application (hosted in a corporate environment), personal data is collected and processed in accordance with the **separate User Agreement** and may be governed by the terms of your company's internal data protection policies.

This Privacy Policy does not cover:

- **Third-Party Websites:** Any third-party websites, services, or applications that are linked from our Website but not operated by AirMemo Inc.
- **Employee Data:** Personal data collected and processed in the context of AirMemo Inc.'s role as an employer. Such data is governed by separate internal privacy policies applicable to employees.

1.3 Data Controller and Contact Information

For the purposes of applicable data protection laws, AirMemo Inc. is the **data controller** of your personal information. This means that we are responsible for determining the purposes and means of processing your personal data.

AirMemo Inc. Contact Information:

- **Company Name:** AirMemo Inc.
- **Email Address:** Privacy@AirMemo.com

If you have any questions about this Privacy Policy, or if you would like to exercise your data protection rights (such as requesting access to, rectification of, or deletion of your personal information), please contact us using the details provided above.

In addition, if you are an individual located in the European Economic Area (EEA), you may contact our designated **Data Protection Officer (DPO)** at Privacy@AirMemo.com for questions related to GDPR compliance.

1.4 Legal Basis for Processing (GDPR-specific)

For individuals located in the European Economic Area (EEA), the legal bases for processing your personal data under the **General Data Protection Regulation (GDPR)** are as follows:

- **Consent:** When you have given clear consent for us to process your personal data for a specific purpose (e.g., subscribing to newsletters).
- **Contractual Necessity:** When processing is necessary for the performance of a contract with you or to take steps at your request prior to entering into a contract (e.g., providing services through the AirMemo application).
- **Legal Obligation:** When processing is necessary to comply with a legal obligation (e.g., tax or regulatory requirements).
- **Legitimate Interests:** When processing is necessary for our legitimate interests,

provided that your rights and freedoms are not overridden (e.g., improving the functionality of the Website, enhancing security).

You may withdraw your consent at any time by contacting us using the information provided in Section 1.3.

1.5 Changes to this Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, legal obligations, or the services we offer. We encourage you to review this Privacy Policy regularly to stay informed about how we are protecting your personal data. If we make any significant changes, we will notify you by posting a notice on the Website or sending an email to the contact information you provided.

The "Last Modified" date at the top of this page indicates the most recent changes to this Privacy Policy.

2. Information We Collect

AirMemo Inc. collects several types of information from and about users of our Website, including personal information, technical data, and information from third parties. This section describes the categories of data we collect, how we collect it, and the purposes for which we use it.

2.1 Personal Information You Provide

We collect personal information that you voluntarily provide to us when you:

- **Create an Account or Use Our Services:** When you interact with AirMemo services, such as signing up for newsletters, creating a user account, or using the

AirMemo application, we may collect information such as your name, email address, company name, job title, and any other relevant details you provide.

- **Communicate with Us:** If you contact us through the Website (e.g., via contact forms, support requests, or email), we collect your contact details and any other personal information you choose to provide as part of that communication (e.g., details about your inquiry).
- **Participate in Surveys or Provide Feedback:** When you participate in surveys, feedback forms, or research activities, we may collect responses that include personal data, such as your opinions, preferences, or other demographic information.

Examples of personal information we collect include:

- **Contact Information:** Name, email address, phone number, and company details.
- **Account Information:** Username, password, and any details associated with your account or profile on the Website or within the AirMemo application.
- **Communication Details:** Information you provide when requesting customer support or when you contact us through email or forms.

2.2 Automatically Collected Information

When you visit or use our Website, we may automatically collect certain information about your device, browsing actions, and patterns. This type of information is collected through technologies such as cookies, web beacons, log files, and other tracking technologies. This data helps us improve the performance and usability of the Website and ensures a seamless user experience.

The types of automatically collected information may include:

- **Device Information:** Such as your IP address, browser type, operating system, device identifiers, and mobile network information.

- **Usage Information:** Information about your activity on the Website, including pages viewed, time spent on the Website, links clicked, and navigation patterns.
- **Cookies and Similar Technologies:** We use cookies and similar tracking technologies (such as pixels and tags) to collect information about your browsing activities over time and across different websites. For more details about our use of cookies, please refer to **Section 5: Cookies and Tracking Technologies**.

2.3 Information from Third Parties

We may receive personal information about you from third-party sources, including:

- **Your Employer or Corporate Sponsor:** For users accessing the AirMemo application within a corporate environment, your employer or the organization sponsoring your use of the application may provide us with information about you, such as your company role, department, or user permissions.
- **Service Providers and Partners:** We may receive information from third-party service providers and partners who provide us with analytics, marketing, or payment processing services. For example, if you engage with a third-party application that integrates with AirMemo services, the third-party provider may share information with us about your usage of their application.
- **Social Media Platforms:** If you interact with us on social media platforms or use your social media credentials to log into the Website, we may receive information such as your public profile data, contact details, and any other data you choose to share through that platform.
- **Advertising Partners:** We may work with advertising partners who collect information about your interactions with ads and promotions across the web. This may include data such as device identifiers, ad impressions, and click-through rates.

2.4 Children's Privacy (COPPA Compliance)

Protecting the privacy of children is especially important to us. We do not knowingly collect personal information from children under the age of 13, in compliance with the **Children's**

Online Privacy Protection Act (COPPA). The Website and services are not intended for use by children under 13, and we do not target our services to them.

- **No Collection Without Parental Consent:** If we learn that we have inadvertently collected personal information from a child under the age of 13 without verifiable parental consent, we will take immediate steps to delete such information from our records.
- **Parental Rights:** Parents or guardians who believe that we may have collected personal information from their child can contact us at Privacy@AirMemo.com to request deletion of the child's information.
- **Users Aged 13-18:** If you are between the ages of 13 and 18, you may only use the Website under the supervision of a parent or legal guardian, and only with their consent to this Privacy Policy.
- **Consent for Minors in Different Jurisdictions:** In jurisdictions governed by GDPR or similar regulations, users under the age of 16 (or the minimum legal age of consent as required by applicable local law) must have parental or guardian consent to provide personal data. We do not knowingly collect data from individuals below this age without such consent.

3. How We Use Your Information

AirMemo Inc. collects and processes personal information for a variety of legitimate business purposes. This section explains how we use the data we collect and the lawful basis for doing so.

3.1 Providing and Improving Services

We use your personal information to operate, maintain, and improve our Website and the services provided through the AirMemo application. This includes:

- **User Account Management:** Processing your account creation and login details, managing your account settings, and providing technical support.
- **Delivering Services:** Using your data to provide the services you have requested, such as giving you access to the AirMemo application, enabling collaboration within your corporate environment, and facilitating communications between you and your team.
- **Improving Service Functionality:** Analyzing how users interact with the Website and application to improve existing features, troubleshoot issues, and develop new services or functionality.
- **Customer Support:** Responding to your inquiries, requests for assistance, and technical support issues. We use the information you provide to resolve issues and improve our customer support processes.

Legal Basis (GDPR-specific): We process this information as it is necessary for the performance of our contract with you (or your employer) and to fulfill legitimate business interests in providing and improving our services.

3.2 Marketing and Communication

With your consent (where required), we use your personal information for marketing purposes, including:

- **Email Marketing:** Sending you newsletters, product updates, promotions, and other information that may be of interest to you. If you have opted in, we may also send promotional content related to third-party partners.
- **Targeted Advertising:** Analyzing your interaction with the Website and services to provide you with relevant advertisements. We may use tracking technologies (such as cookies and pixels) to collect data about your browsing activities to show targeted ads across third-party platforms.
- **User Surveys and Feedback:** Inviting you to participate in surveys, polls, or

feedback sessions to better understand your preferences and improve our services.

You can opt-out of marketing communications at any time by following the "unsubscribe" link in the email or by contacting us at Privacy@AirMemo.com.

Legal Basis (GDPR-specific): We process your personal data for marketing purposes based on your consent, and you may withdraw your consent at any time.

3.3 Analytics and Product Development

We use automatically collected data and other information to understand how users interact with our Website and services, enabling us to improve our offerings. Specific uses include:

- **Analyzing Website Traffic:** We analyze usage data (such as IP addresses, device types, and browsing patterns) to identify trends, diagnose issues, and optimize performance.
- **Developing New Features and Products:** By analyzing user behavior and feedback, we can develop new tools, services, and features to meet user needs and improve the user experience.
- **Conducting Research:** We may use aggregate or anonymized data to conduct internal research and development, measure the effectiveness of our services, and assess our marketing strategies.

Legal Basis (GDPR-specific): Processing for analytics and product development is based on our legitimate interests in improving and expanding our products and services.

3.4 Legal and Compliance Obligations

We may use your personal information to comply with legal obligations or respond to lawful requests from public authorities. This includes:

- **Legal Compliance:** Processing your personal information as required by applicable laws, regulations, or government requests (e.g., tax, regulatory, or employment laws).
- **Law Enforcement Requests:** Disclosing information to law enforcement agencies or regulators when required by law, or when necessary to protect our legal rights.
- **Fraud Prevention and Security:** Using your information to detect, investigate, and prevent fraudulent activities, security breaches, or other unlawful activities that could harm AirMemo Inc., its users, or the public.

Legal Basis (GDPR-specific): Processing your data for legal and compliance obligations is based on our need to comply with legal obligations and protect our legitimate interests.

3.5 Personalization and User Experience

We may use your information to personalize your experience on the Website and within the AirMemo application, tailoring content, recommendations, and features to your preferences. This includes:

- **Personalized Content:** Delivering customized content or features based on your usage patterns, preferences, and prior interactions with the Website.
- **Location-Based Services:** Using geolocation data (if provided) to tailor services and recommendations to your location or region.
- **User Interface Customization:** Remembering your preferences (such as language settings, account details, or personalization settings) to enhance your user experience.

Legal Basis (GDPR-specific): This processing is based on our legitimate interest in improving and personalizing the user experience, as well as your consent where required for the use of cookies or tracking technologies.

4. How We Share Your Information

AirMemo Inc. is committed to protecting the privacy of your information and limiting data sharing to only what is necessary for the operation of our services. We do not share, sell, or rent your personal information or corporate data to outside advertisers or third-party marketing entities. However, in specific situations, we may share certain information as described below.

4.1 Sharing with Service Providers and Vendors

To provide and support our Website, the AirMemo application, and related services, we may share certain personal information with third-party service providers and vendors who assist us in operating our business. These service providers are contractually bound to protect your data and are only permitted to use it for the purposes specified in our agreement with them. This includes:

- **Hosting and Data Storage Providers:** We may store your data on secure servers managed by third-party hosting providers.
- **Payment Processors:** If you or your organization make payments through the Website, we may share your information with third-party payment processors to facilitate transactions securely.
- **Technical Support and Maintenance Providers:** We may share your information with service providers who help us maintain and improve our Website and application.
- **Data Processing by Service Providers and Subprocessors:** We may engage subprocessors to assist in providing our services. Any such subprocessors will only process personal data in accordance with our instructions and in compliance with this Privacy Policy and applicable data protection laws. We require all subprocessors to implement appropriate technical and organizational measures to

ensure the security and confidentiality of your data.

4.2 Sharing with Affiliates and Partners

We may share your information with our **affiliates** or **business partners** where necessary to provide our services. However, this is limited to entities within our corporate group or partners that help us deliver services or enhance user experiences. Any such sharing will be limited to the scope necessary for the specific purpose, and these parties are bound by confidentiality agreements.

4.3 Legal Disclosures

AirMemo Inc. may disclose your personal information if required to do so by law or in response to valid requests by public authorities, including:

- **Compliance with Legal Obligations:** We may disclose your information where necessary to comply with legal obligations, including subpoenas, court orders, or other legal processes.
- **Protecting Our Legal Rights:** We may share information if it is necessary to establish, exercise, or defend our legal rights, including enforcing our Terms of Service or preventing fraud or other illegal activities.
- **Safety and Security:** We may share your information when we believe it is necessary to protect the rights, property, or safety of AirMemo Inc., our users, or others.

4.4 Corporate Transactions

In the event of a **merger, acquisition, reorganization, or sale of all or part of our assets**, your information may be transferred as part of the corporate transaction. Should such a transaction occur, we will ensure that any acquiring entity agrees to protect your personal data in accordance with this Privacy Policy. We will notify you before your personal information is transferred and becomes subject to a different privacy policy.

4.5 User-Requested Sharing

In certain cases, you may request that we share your information with others. For example:

- **Collaborative Features:** When you use collaborative features within the AirMemo application, certain information (such as your profile information or content) may be shared with others within your organization or corporate environment.
- **Third-Party Integrations:** If you opt to use third-party applications or integrations that work with AirMemo (e.g., single sign-on providers or analytics tools), we may share data with those third parties based on your instructions.

4.6 Use of Corporate Logos

We reserve the right to use the logos and names of corporations or organizations that use AirMemo services for **marketing and promotional purposes**, including displaying them on our Website and in presentations or promotional materials. This use will not involve any sharing of personal data, and we will not disclose any details of your usage of the AirMemo application without your consent, unless required by law.

If you wish to opt out of the use of your organization's logo or name in our promotional materials, please contact us at Privacy@AirMemo.com.

5. Cookies and Tracking Technologies

AirMemo Inc. is committed to a **data minimization approach**, collecting only the data necessary for essential operations, including certain tracking technologies used for customer relationship management and sales engagement. This section explains the types of cookies and tracking technologies we use and provides transparency regarding data collected through sales and CRM tools.

5.1 What Cookies We Use

Cookies are small text files stored on your device when you access the Website. We use several types of cookies, including **essential cookies** for basic functionality and **tracking cookies** for sales and CRM purposes. These cookies help us ensure security, maintain functionality, and improve your experience through limited sales and marketing-related tracking.

The types of cookies we may use include:

- **Essential Cookies:** These cookies are necessary to provide core services on the Website and application. They enable access to secure areas and support basic functionality.
 - **Examples:** Cookies that allow you to log into secure areas, remember your session settings, and ensure security during browsing.
- **Sales and CRM Tracking Cookies:** We use limited tracking technologies from service providers, such as Salesforce or HubSpot, to understand user engagement and interactions with our services. This tracking allows us to personalize and improve customer support, respond to inquiries, and offer relevant information to prospective and existing customers.

5.2 How We Use Cookies

We use cookies for operational, security, and sales-related purposes as outlined below:

- **Authentication and Security:** Essential cookies ensure that you can securely log into the Website and the AirMemo application.
- **Session Management:** Essential cookies help maintain your session and remember login details as you navigate through different pages.
- **Functionality:** Essential cookies support the efficient operation of the Website and application, including account access and payment processing.

- **Sales and Customer Relationship Management:** Tracking technologies, such as those provided by Salesforce, HubSpot, or similar CRM tools, allow us to understand your interactions with our Website, deliver personalized responses, and manage inquiries effectively. We do not track user behavior beyond the purpose of improving customer relationships and providing relevant sales information.

All tracking related to sales and CRM purposes is strictly limited to interactions with our Website and does not extend beyond necessary customer engagement.

5.3 Managing Cookie Preferences

While we use essential cookies and limited tracking technologies for CRM purposes, users can manage their cookie preferences by configuring browser settings to block or delete cookies. Please note that disabling essential cookies may impact the functionality of the Website, and some features may not work as intended.

- **Opting Out of Sales and CRM Tracking:** If you prefer not to be tracked for sales and CRM purposes, you may adjust your cookie preferences in your browser or contact us at Privacy@AirMemo.com for more information. However, certain aspects of our customer support or sales follow-up may be affected.

5.4 Third-Party Tracking Technologies

AirMemo Inc. uses tracking technologies from trusted service providers like Salesforce or HubSpot to support customer relationship management. However, we do not use tracking pixels, web beacons, or third-party advertising services. We also do not share any data with third-party advertising networks, social media platforms, or external marketing partners.

5.5 Data Minimization Pledge

AirMemo Inc. is committed to data minimization specifically for our customers and their data within the AirMemo application. This pledge means that we:

- Only collect the minimum data necessary to provide essential services within the AirMemo application and support customer needs.
- Do not use customer data for analytics, advertising, or external marketing purposes unless explicitly authorized by the customer.
- Limit customer-related tracking to what is necessary to ensure operational functionality, security, and customer support.

This commitment applies exclusively to customer data collected through the AirMemo application, not to tracking for sales, CRM, or other purposes on our Website.

6. Your Privacy Rights

AirMemo Inc. is committed to respecting your privacy rights and providing you with control over your personal data. Depending on your location, you may have specific legal rights regarding the personal information we collect and process. This section outlines the privacy rights available to you and how you can exercise them.

6.1 Access, Correction, and Deletion of Personal Information

You have the right to request access to the personal information we hold about you. If you believe that any of the personal information we have collected is inaccurate or incomplete, you may request that we correct or update that information. You also have the right to request the deletion of your personal information, subject to certain legal or operational limitations.

- **Right of Access:** You may request a copy of the personal information we hold about you, including details on how we use your data and whom we share it with.
- **Right to Correction:** If your information is incorrect, incomplete, or outdated, you

may request that we correct or update it.

- **Right to Deletion:** You may request that we delete your personal information, provided that we are not required to retain it for legal, regulatory, or operational reasons.

To exercise these rights, please contact us at Privacy@AirMemo.com. We will respond to your request within a reasonable timeframe, in compliance with applicable data protection laws.

6.2 Opt-Out of Marketing Communications

If you have subscribed to receive marketing communications from us, you have the right to opt out of receiving future communications at any time. You can do this by:

- **Unsubscribing:** Clicking the "unsubscribe" link in any marketing email we send.
- **Direct Contact:** Contacting us at Privacy@AirMemo.com to request removal from our mailing list.

Please note that even if you opt out of marketing communications, we may still send you non-promotional messages related to your account, service updates, or other administrative communications that are necessary for the functioning of our services.

6.3 Data Portability

Where legally required (e.g., under **GDPR**), you may have the right to receive your personal data in a structured, commonly used, and machine-readable format. This right allows you to:

- Request that we provide a copy of your personal data to you or directly to another service provider if it is technically feasible.

To request data portability, please contact us at Privacy@AirMemo.com, and we will

provide your data in the required format within the time period mandated by applicable laws.

6.4 Right to Object and Restrict Processing

You have the right to object to our processing of your personal information or request that we restrict the processing of your personal data in certain circumstances:

- **Right to Object:** You may object to the processing of your personal information for direct marketing purposes or for legitimate business interests. Once you object, we will no longer process your personal data for those purposes unless we demonstrate compelling legitimate grounds for the processing.
- **Right to Restrict Processing:** You may request that we limit the processing of your personal data if you contest its accuracy, if the processing is unlawful, or if you need the data for legal claims, but do not want us to delete it.

If you would like to object to or restrict the processing of your personal information, please contact us at Privacy@AirMemo.com.

6.5 Rights under CCPA (California Residents)

If you are a resident of California, you have specific rights under the **California Consumer Privacy Act (CCPA)**. These rights include:

- **Right to Know:** You have the right to request that we disclose the categories of personal information we collect, the sources of that information, the business purposes for which it is collected, and the categories of third parties with whom we share it.
- **Right to Deletion:** You have the right to request that we delete the personal information we have collected about you, subject to certain exceptions.
- **Right to Opt-Out of Sale:** You have the right to opt out of the sale of your personal information. However, please note that AirMemo Inc. does not sell your personal

data to third parties.

- **Non-Discrimination:** We will not discriminate against you for exercising any of your rights under the CCPA, such as denying services, charging different prices, or providing a different quality of service.
- **Explicit Notice Regarding “Do Not Track”:** Some web browsers offer a 'Do Not Track' feature, which sends a signal to websites requesting that your browsing activity not be tracked. At this time, AirMemo Inc. does not respond to 'Do Not Track' signals, as we do not track users for marketing or analytics purposes.

To exercise your CCPA rights, please contact us at Privacy@AirMemo.com. We will verify your identity before processing your request, as required by the CCPA.

6.6 Rights under GDPR (EU Residents)

If you are a resident of the European Union (EU) or the European Economic Area (EEA), you are entitled to certain rights under the **General Data Protection Regulation (GDPR)**, including:

- **Right to Access:** You have the right to access the personal information we hold about you and receive a copy of that data.
- **Right to Rectification:** You may request the correction of inaccurate or incomplete personal data.
- **Right to Erasure:** You may request the deletion of your personal data where it is no longer necessary for the purposes for which it was collected, or if you withdraw consent.
- **Right to Restriction:** You may request that we restrict the processing of your data under certain circumstances, such as when you contest the accuracy of the data or when the processing is unlawful.
- **Right to Data Portability:** You have the right to receive your personal data in a structured, machine-readable format and to transmit that data to another data controller where technically feasible.

- **Right to Object:** You may object to the processing of your personal data for certain purposes, including direct marketing and profiling.

To exercise any of these GDPR rights, please contact our Data Protection Officer (DPO) at Privacy@AirMemo.com. We will process your request in accordance with applicable GDPR timelines and requirements.

7. Data Retention and Security

AirMemo Inc. is committed to protecting the personal information we collect and ensuring that it is retained and managed securely. This section outlines how long we keep your data, the security measures we implement, and our procedures in the event of a data breach.

7.1 How Long We Keep Your Information

We retain personal information for as long as necessary to fulfill the purposes for which it was collected, including to provide services, comply with legal obligations, resolve disputes, and enforce our agreements. The retention period for personal data depends on several factors, including:

- **Operational Necessity:** We retain personal information for as long as it is necessary to provide services to you or your organization, such as maintaining your user account or supporting ongoing business operations.
- **Legal and Regulatory Compliance:** We may retain personal information for longer periods where required by law (such as tax or accounting regulations) or to comply with legal obligations.
- **Dispute Resolution:** If a dispute or legal claim arises, we may retain relevant information until the matter is resolved and for a reasonable period thereafter, as

required by applicable law.

Once personal information is no longer necessary for the purposes for which it was collected, we will securely delete, anonymize, or de-identify the data in accordance with our data retention policies and applicable legal requirements.

7.2 Data Security Measures

We implement robust technical, administrative, and physical security measures designed to protect your personal information from unauthorized access, use, alteration, disclosure, or destruction. These measures include:

- **Encryption:** We use industry-standard encryption technologies to protect sensitive information during transmission and storage.
- **Access Controls:** We limit access to personal information to authorized employees, contractors, and service providers who need the data to perform their duties, and we require them to maintain the confidentiality and security of the information.
- **Data Anonymization:** Where possible, we anonymize or pseudonymize personal data to reduce the risk of exposure.
- **Regular Security Audits:** We regularly review and update our security practices and conduct vulnerability assessments to identify and mitigate potential risks to the security of our systems and data.
- **Monitoring and Logging:** We monitor access to and use of our systems to detect and respond to security threats or breaches.

While we take all reasonable steps to protect your information, no method of transmission over the internet or electronic storage is 100% secure. Therefore, we cannot guarantee the absolute security of your personal data. If you believe that your personal information has been compromised, please contact us immediately at Privacy@AirMemo.com.

7.3 Data Breaches and Notifications

In the unlikely event of a data breach that compromises the security or privacy of your personal information, we will take the following steps:

- **Internal Investigation:** Upon discovering a potential breach, we will immediately initiate an internal investigation to assess the scope and impact of the breach.
- **Containment and Mitigation:** We will take all necessary steps to contain the breach and mitigate any damage, including securing affected systems, recovering compromised data, and preventing further unauthorized access.
- **Notification to Affected Individuals:** If the breach is likely to result in a high risk to your rights and freedoms, we will notify you as soon as possible. The notification will include:
 - A description of the nature of the breach and the types of data affected.
 - Contact details for further information or assistance.
 - Recommended steps you can take to protect yourself, such as changing passwords or monitoring your accounts.
- **Notification to Regulators:** Where required by applicable law (such as the **General Data Protection Regulation (GDPR)** or **California Consumer Privacy Act (CCPA)**), we will notify the relevant data protection authorities within the required timeframe.

Legal Obligations for Breach Notification:

- **GDPR Compliance:** If a data breach is likely to result in a risk to the rights and freedoms of individuals, we will notify the relevant supervisory authority within **72 hours** of becoming aware of the breach.
- **CCPA Compliance:** In the event of a data breach involving the personal data of California residents, we will notify the California Attorney General and affected individuals in accordance with the **California Consumer Privacy Act (CCPA)**.

We are committed to ensuring transparency and accountability in the unlikely event of a

data breach, and we will take all necessary steps to safeguard your personal information.

8. International Data Transfers

As a global service provider, AirMemo Inc. may need to transfer your personal information across international borders, including to countries that may not have the same level of data protection as your country of residence. This section explains how we handle international data transfers and ensure compliance with applicable data protection laws.

8.1 How We Handle Data Transfers

For our customers and their data within the AirMemo application, we adhere to a data minimization pledge, limiting data collection to what is necessary to operate and support the application. All customer data transferred internationally is handled in accordance with applicable data protection laws to safeguard privacy and minimize data exposure. For other Website users, such as those engaging with our sales or marketing content, standard data protections apply based on region and purpose of collection.

8.2 Standard Contractual Clauses (SCCs) and Adequacy Decisions

For data transfers from the EU/EEA to countries that do not benefit from an **adequacy decision** issued by the European Commission (such as the United States), AirMemo Inc. relies on legally recognized mechanisms to safeguard your personal data:

- **Standard Contractual Clauses (SCCs):** We use **Standard Contractual Clauses (SCCs)**, which are pre-approved legal contracts developed by the European Commission, to ensure that the transfer of personal data outside the EU/EEA is conducted in compliance with GDPR requirements. These clauses ensure that your data is protected by commitments regarding privacy and security, even when processed outside the EU/EEA.

- **Adequacy Decisions:** In some cases, we may transfer your personal data to countries deemed to have an adequate level of data protection by the European Commission. An adequacy decision means that the European Commission has determined that the country's laws provide equivalent protection to GDPR standards.

By using these mechanisms, we ensure that your personal data is safeguarded no matter where it is transferred.

8.3 International Users and Local Laws

If you are accessing the Website or using AirMemo's services from a country other than the United States, please be aware that your personal data may be transferred to, processed, and stored in a jurisdiction with different data protection laws than those in your home country. We will take appropriate steps to ensure that your privacy is protected as described in this Privacy Policy, regardless of where your personal data is processed.

- **Compliance with Local Laws:** We strive to comply with all applicable data protection laws in the jurisdictions where we operate, including but not limited to **GDPR, CCPA**, and other similar regulations. If there are any conflicts between local laws and this Privacy Policy, we will process your personal data in accordance with the most stringent applicable laws.

8.4 Your Rights and Control over International Transfers

You have the right to:

- **Request Information about International Transfers:** If you are located in the EU/EEA, you may request more information about the safeguards in place for the transfer of your personal data outside the EU/EEA.
- **Withdraw Consent:** If your personal data is being transferred based on your consent, you have the right to withdraw your consent at any time. This will not

affect the lawfulness of data transfers that occurred before your consent was withdrawn.

To exercise these rights, or for more information about international data transfers, please contact us at Privacy@AirMemo.com.

8.5 Updates to International Transfer Practices

Given the evolving nature of international data transfer laws and regulations, we may update this section from time to time to reflect changes in our practices or legal requirements. We will notify you of any significant updates, and you can always review the latest version of this Privacy Policy on our Website.

9. Third-Party Links

The Website and the AirMemo application may contain links to third-party websites, services, or resources that are not operated or controlled by AirMemo Inc. This section outlines our policies regarding third-party links, our liability concerning those third-party services, and how your data may be collected or shared when interacting with those links.

9.1 External Links and Liability

AirMemo Inc. may provide links to third-party websites or services as a convenience for users. However, we do not endorse, monitor, or have control over the content, privacy practices, or data handling policies of these third-party websites. Once you click on a third-party link, you will leave our Website, and any data or information you provide on those third-party websites will be subject to their privacy policies and terms of service.

- **No Control or Responsibility:** AirMemo Inc. is not responsible for the privacy practices, security measures, or data collection procedures of third-party websites

or services. We do not monitor or review the content or functionality of those external sites and assume no liability for any actions or policies of third-party websites.

- **User Discretion:** You acknowledge that clicking on third-party links and providing personal information on third-party websites is at your own risk. We encourage you to review the privacy policies of any third-party website you visit to understand how your information is collected and used.

AirMemo Inc. is not liable for any damages, losses, or privacy violations that may occur as a result of your interaction with third-party websites, including, but not limited to:

- The security or accuracy of third-party websites.
- The data collection, sharing, or handling practices of third parties.
- The content, products, or services offered on third-party websites.

9.2 Data Shared with or Collected by Third Parties via Links

When you interact with third-party websites or services through links on the AirMemo platform or Website, your personal data may be shared with or collected by those third parties. This may include:

- **Cookies and Tracking Technologies:** Third-party websites may use cookies, web beacons, or other tracking technologies to collect data about your browsing activities or to deliver personalized advertisements. AirMemo Inc. does not have access to or control over these technologies.
- **Third-Party Data Collection:** If you provide personal information directly to a third-party website (e.g., subscribing to a service, making a purchase), the collection, storage, and use of that information will be governed by the third party's privacy policy.

We do not share personal information with third-party websites unless you explicitly

choose to interact with those websites (e.g., by clicking a link or integrating with a third-party service). However, once you leave our Website, any data you share with those third parties is no longer covered by this Privacy Policy.

Key Considerations:

- **User Consent:** By clicking on a third-party link, you consent to any data collection or processing that may occur on that external website.
- **Limited Sharing from Our Side:** AirMemo Inc. will not share your personal information with third-party websites unless you have specifically opted in to such sharing as part of a service integration or interaction with those third parties.

We strongly recommend reviewing the privacy policies and terms of service of any third-party websites before providing any personal information or interacting with their services.

10. Changes to this Privacy Policy

AirMemo Inc. may update this Privacy Policy from time to time to reflect changes in our practices, legal obligations, or the services we offer. This section explains how we will notify users of any changes and the effective date of the current version of the Privacy Policy.

10.1 How We Notify Users of Changes

We are committed to transparency, and any changes to this Privacy Policy will be communicated in advance where possible. If we make any material changes to how we collect, use, or share personal information, we will:

- **Notify You via Email:** For users who have provided their email address and have subscribed to updates, we will send a notification outlining the changes to the Privacy Policy.
- **Post a Notice on Our Website:** We will post a clear and prominent notice on our Website or within the AirMemo application informing you of any updates to this Privacy Policy.
- **Review and Consent for Material Changes:** In certain cases, if the changes are significant and affect your rights, we may request your consent before applying those changes.

We encourage users to review this Privacy Policy periodically to stay informed about how we protect your personal information.

10.2 Effective Date of the Policy

The "Last Modified" date at the top of this Privacy Policy indicates when the most recent changes were made. This Privacy Policy is effective as of the date specified. Continued use of the Website or services after the effective date will be considered as acceptance of the updated terms.

10.3 Changes to the Data Minimization Pledge

Any changes to the scope or application of our Data Minimization Pledge specific to customer data will be communicated directly to affected customers in advance, ensuring transparency in our data collection practices.

11. Contact Information

If you have any questions, concerns, or requests regarding this Privacy Policy, or if you would like to exercise your privacy rights, please contact us using the details provided below.

11.1 How to Contact AirMemo Inc. Regarding Privacy Issues

We value your privacy and are committed to addressing any concerns or inquiries you may have about the collection, use, or protection of your personal information. You can reach us at:

- **Company Name:** AirMemo Inc.
- **Email:** Privacy@AirMemo.com

If you are located in the **European Union (EU)** or **European Economic Area (EEA)** and have questions regarding **GDPR** compliance, you may contact our **Data Protection Officer (DPO)** at Privacy@AirMemo.com.

We aim to respond to all inquiries within a reasonable timeframe, typically within 30 days, in compliance with applicable data protection laws.