

## DataTurk North American Privacy Policy

Welcome, and thank you for your interest in DataTurk.ai, LLC (“**DataTurk**,” “**we**,” or “**us**”) and our website at [www.DataTurk.ai](http://www.DataTurk.ai) (the “**Site**”), as well as all related web sites, networks, downloadable software, mobile applications, and other services provided by us and on or through which a link to this North American Privacy Policy (this “**Policy**”) is displayed (collectively, together with the Site, our “**Service**”).

This Policy describes how DataTurk may collect, use, process, disclose, and safeguard information we obtain through the Service. It also tells you about your rights and choices with respect to your information, and how you can contact us if you have any questions or concerns.

This Policy is incorporated into and is subject to the DataTurk Service Agreement. Capitalized terms used but not defined in this Policy have the meaning given to them in the DataTurk Service Agreement.

### 1. Personal Information We Collect

For the purpose of this Policy, “Personal Information” means any information relating to an identified or identifiable individual. We obtain Personal Information relating to you from various sources described below.

Where applicable, we indicate whether and why you must provide us with your Personal Information, as well as the consequences of failing to do so. If you do not provide Personal Information when requested, you may not be able to benefit from our Service if that information is necessary to provide you with the service or if we are legally required to collect it.

#### a. Personal Information Provided by You

**Account Registration.** If you register to use the Service, then you must provide us with your name, email address, and a password in order to create an account and user profile. Some types of user registrations may also require a company name, physical address or location, API key, and other information requested on the registration page.

**Making Payments.** When you make payments to or through the Service, you may need to provide Personal Information to our third-party service providers, such as your credit card number and billing address.

**User Content.** We will collect any information you upload or post to or through the Service.

**Communications.** We will collect any information which you provide to us through your communications e.g., when you communicate with our customer support team.

#### b. Information Collected via Automated Means

In addition to information that you provide to us, we may collect information about you and your use of the Service via automated means, such as cookies, web beacons, third-party analytics providers, and similar technologies. Information collected by a third party is subject to that third party’s own data collection, use, and disclosure policies.

### c. Personal Information

We may collect Personal Information about you and your end-customers from third party platforms or services that you give us access to.

## 2. How We Use Personal Information We Collect

We may use Personal Information we collect for the following purposes:

**Internal and Service-Related Usage.** We use your Personal Information to operate, maintain, enhance and provide all features of the Service, to provide services and information that you request, to respond to comments and questions and otherwise to provide support to users.

**Analytics and Improving the Service.** We use your Personal Information to understand and analyze the usage trends and preferences of our users, to improve the Service, and to develop new products, services, features, and functionality.

**Communications.** We may use your email address or other Personal Information (i) to contact you for administrative purposes such as customer service, to address intellectual property infringement, privacy violations or defamation issues related to your user content posted on the Service or (ii) to send communications, including updates on promotions, relating to products and services offered by us and by third parties we work with. Generally, you have the ability to opt-out of receiving any promotional communications as described below under “Your Rights and Choices.”

**Tailored Content.** We may use your Personal Information to: (i) personalize our services, such as remembering your information so that you will not have to re-enter it during your visit or the next time you visit the Service; (ii) provide customized advertisements, content, and information.

**Aggregate Data.** We may de-identify and aggregate information to monitor and analyze the effectiveness of our Service and third-party marketing activities and to monitor aggregate site usage metrics such as total number of visitors and pages viewed. [CA2]

**Partners and Vendors.** We use Personal Information collected from our business partners and vendors to manage those relationships.

**Legal.** We may use your Personal Information to enforce our Service Agreement, to defend our legal rights, to comply with our legal obligations and internal policies.

**Other Purposes.** We also may use your Personal Information as may be described in a notice to you at the time the information is collected, or in any other manner to which you consent.

### 3. How We Disclose Your Personal Information

Except as described in this Policy or otherwise disclosed to you at the time of the collection, we will not disclose your Personal Information to third parties without your consent. We may disclose information to third parties in the following circumstances:

- **DataTurk affiliates and subsidiaries.** We may disclose Personal Information about you with our affiliates and subsidiaries.
- **Vendors and Service Providers.** We work with third party service providers to provide website or application development, hosting, maintenance, and other services for us. These third parties may have access to or process your Personal Information as part of providing those services for us. We limit the information provided to these service providers to that which is necessary for them to perform their functions, and we require them to agree to maintain the confidentiality of such information.
- **Advertising Partners.** We may share your Personal Information with our third party advertising partners to provide ads that we think may interest you. For more information about our advertising and marketing practices and those of the third party advertising partners, please see the Personal Information Collected by Automated Means section above. [CA3] [CA4]
- **Other Third Parties.** We may also share Personal Information about you with other third parties in the following circumstances:
  - **In Aggregated Form.** We may make certain automatically-collected, aggregated, or otherwise de-identified information available to third parties for various purposes, including (i) compliance with various reporting obligations; (ii) for business or marketing purposes; or (iii) to assist such parties in understanding our users' and their end-customers' interests, habits, and usage patterns for certain programs, content, services, advertisements, promotions, and/or functionality available through the Service.
  - **To Comply with Legal Obligations.** We may disclose your information if required to do so by law or in the good-faith belief that such action is necessary to comply with state and federal laws (such as U.S. copyright law), in response to a court order, judicial or other government subpoena or warrant, or to otherwise cooperate with law enforcement or other governmental agencies.
  - **To Protect and Enforce Our Rights.** We also reserve the right to disclose your information that we believe, in good faith, is appropriate or necessary to (i) take precautions against liability, (ii) protect ourselves or others from fraudulent, abusive, or unlawful uses or activity, (iii) investigate and defend ourselves against any third-party claims or allegations, (iv) protect the security or integrity of the Service and any facilities or equipment used to make the Service available, or (v) protect our property or other legal rights (including, but not limited to, enforcement of our agreements), or the rights, property, or safety of others.
  - **In case of Merger, Sale, or Other Asset Transfer.** Information about our users and their end-customers, including Personal Information, may be disclosed and otherwise transferred to an acquirer, or successor or assignee as part of any merger, acquisition,

debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets.

- **With Your Consent.** We also may disclose your Personal Information as may be described in a notice to you at the time the information is collected, or in any other manner to which you consent.

## 4. Your Rights and Choices

**Account Information.** You may, of course, decline to share certain Personal Information with us, in which case we may not be able to provide to you some of the features and functionality of the Service. You may update, correct, or delete your profile information and preferences at any time by accessing your account settings page on the Service. If you are not a registered user of the Service, if you wish to access or amend any other Personal Information we hold about you, or if you would like to request that we delete any information about you that we have obtained, you may contact us at [privacy@DataTurk.ai](mailto:privacy@DataTurk.ai). Please note that while any changes you make will be reflected in active user databases instantly or within a reasonable period of time, we may retain all information you submit for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that we have a legitimate reason to do so, to the extent permitted under applicable law.

**Opt-Out.** If you receive commercial email from us, you may unsubscribe at any time by following the instructions contained within the email. You may also opt-out from receiving commercial email from us, and any other promotional communications that we may send to you from time to time, by sending your request to us by email [privacy@DataTurk.ai](mailto:privacy@DataTurk.ai). We may allow you to view and modify settings relating to the nature and frequency of promotional communications that you receive from us in user account functionality on the Service.

Please be aware that if you opt-out of receiving commercial email from us or otherwise modify the nature or frequency of promotional communications you receive from us, it may take up to ten business days for us to process your request, and you may receive promotional communications from us that you have opted out from during that period, unless we are required by applicable law to process your request within a shorter period of time. Additionally, even after you opt-out from receiving commercial messages from us, you will continue to receive administrative messages from us regarding the Service.

**Privacy Settings.** Although we may allow you to adjust your privacy settings to limit access to certain Personal Information, please be aware that no security measures are perfect or impenetrable. To the fullest extent permitted under applicable law, we are not responsible for circumvention of any privacy settings or security measures on the Service. Additionally, we cannot control the actions of others with whom you may choose to share your information. Further, even after information posted on the Service is removed, caching and archiving services may have saved that information, and others, including third parties, may have copied or stored the information available on the Service. To the fullest extent permitted under applicable law, we cannot and do not guarantee that information you post on or transmit to the Service will not be viewed by unauthorized persons.

**Do Not Track.** Some web browsers incorporate a “Do Not Track” feature. Because there is not yet an accepted standard for how to respond to Do Not Track signals, our website does not currently respond to such signals.

## 5. California Consumer Privacy Act

1. CCPA Rights. The California Consumer Privacy Act (the “CCPA”) provides certain rights to consumers, including the following:
  1. Right to Know: You have the right to request that we disclose to you the Personal Information we collect, use, or disclose, and information about our data practices.
  2. Right to Request Deletion: You have the right to request that we delete your Personal Information that we have collected from you.
  - c. Right to Non-Discrimination: We will not discriminate against you for exercising any of these rights.

These rights are not absolute, and there may be cases when we decline your request as permitted by law.

If you are a California resident, we only collect and process Personal Information about you as a result of your business dealings with us. This means that the consumer rights under the CCPA do not apply to you.

2. Disclosures. DataTurk does not sell Personal Information. We share Personal Information with authorized service providers or business partners who have agreed to our contractual limitations as to their retention, use, and disclosure of such Personal Information. We also share Personal Information if you use our services to interact with third parties or direct us to disclose your Personal Information to third parties.
3. Information Collected. We collect the following types of information from you, your device(s), or from third parties:
  1. identifiers, such as browser information, device information, and security information;
  2. commercial information, such as account information, contact information, transaction information, and usage information;
  3. internet or network information, such as browser information and device information;
  4. geolocation data, such as browser information and device information;
  5. financial information, such as payment information;
  6. other Personal Information, such as support information; and
  7. information derived from other categories, which could include your preferences, interests, and other information used to personalize your experience.

We may disclose this Personal Information for the business purposes described in this privacy policy, such as disclosures to service providers that assist us with securing our services or marketing our products.

4. Right to Know; Deletions. To exercise your “right to know” or your “right to request deletion,” contact at [privacy@dataturk.ai](mailto:privacy@dataturk.ai). To protect your Personal Information, we will verify your identity by a method appropriate to the type of request you are making. We may also request that your

authorized agent have written permission from you to make requests on your behalf, and we may also need to verify your authorized agent's identity to protect your Personal Information.

## **6. Third-Party Services**

This Privacy Policy applies only to the processing of your Personal Information by DataTurk. The Service may contain features or links to Web sites and services provided by third parties. The policies and procedures described in this Privacy Policy do not apply to Third Party Sites. Any information you provide on third-party sites or services is provided directly to the operators of such services and is subject to those operators' policies, if any, governing privacy and security, even if accessed through the Service. We are not responsible for the content or privacy and security practices and policies of third-party sites or services to which links or access are provided through the Service. We encourage you to learn about third parties' privacy and security policies before providing them with information.

## **7. Children's Privacy**

Protecting the privacy of young children is especially important. Our Service is not directed to children under the age of 16, and we do not knowingly collect Personal Information from children under the age of 16 without obtaining parental consent. If you are under 16 years of age, please do not use or access the Service at any time or in any manner. If we learn that Personal Information has been collected on the Service from persons under 16 years of age and without verifiable parental consent, then we will take the appropriate steps to delete this information. If you are a parent or guardian and discover that your child under 16 years of age has obtained an account on the Service, then you may alert us at [privacy@DataTurk.com](mailto:privacy@DataTurk.com) and request that we delete that child's Personal Information from our systems.

## **8. Data Security**

We use certain physical, managerial, and technical safeguards that are designed to appropriately protect Personal Information against accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure or access, misuse, and any other unlawful form of processing of the Personal Information in our possession. WE CANNOT, HOWEVER, ENSURE OR WARRANT THE SECURITY OF ANY INFORMATION YOU TRANSMIT TO US OR STORE ON THE SERVICE, AND YOU DO SO AT YOUR OWN RISK. WE ALSO CANNOT GUARANTEE THAT SUCH INFORMATION MAY NOT BE ACCESSED, DISCLOSED, ALTERED, OR DESTROYED BY BREACH OF ANY OF OUR PHYSICAL, TECHNICAL, OR MANAGERIAL SAFEGUARDS. The foregoing is subject to requirements under applicable law to ensure or warrant information security.

If we learn of a security systems breach, then we may attempt to notify you electronically so that you can take appropriate protective steps. We may post a notice through the Service if a security breach occurs. Depending on where you live, you may have a legal right to receive notice of a security breach in writing. To receive a free written notice of a security breach you should notify us at [privacy@DataTurk.ai](mailto:privacy@DataTurk.ai).

## **9. Data Retention**

We take measures to delete your Personal Information or keep it in a form that does not permit identifying you when this information is no longer necessary for the purposes for which we process it, unless we are required by law to keep this information for a longer period. When determining the retention period, we take into account various criteria, such as the type of products and services requested by or provided to you, the nature and length of our relationship with you, possible re-enrolment with our products or services, the impact on the services we provide to you if we delete some information from or about you, mandatory retention periods provided by law and the statute of limitations.

## **10. Data Transfers**

The Service is hosted in North America and is intended solely for visitors located within North America. If you choose to use the Service from other regions of the world, then please note that you are transferring your Personal Information outside of those regions to the United States for storage and processing. Also, we may transfer your data from North America to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating the Service. By providing any information, including Personal Information, on or to the Service, you consent to such transfer, storage, and processing.

## **11. Changes and Updates to this Policy**

Please revisit this page periodically to stay aware of any changes to this Policy, which we may update from time to time. If we modify the Policy, we will make it available through the Service, and indicate the date of the latest revision. In the event that the modifications materially alter your rights or obligations hereunder, we will make reasonable efforts to notify you of the change. For example, we may send a message to your email address, if we have one on file, or generate a pop-up or similar notification when you access the Service for the first time after such material changes are made. Your continued use of the Service after the revised Policy has become effective indicates that you have read, understood and agreed to the current version of the Policy.

## **12. How to Contact Us**

DataTurk.ai, LLC is the entity responsible for the processing of your Personal Information as described in this Policy. If you have any questions or comments about this Policy, your Personal Information, our use and disclosure practices, your consent choices, or if you would like to exercise your rights, please contact us by email at [privacy@DataTurk.ai](mailto:privacy@DataTurk.ai).