

<b>Privacy Policy Ploito</b>	<b>2</b>
What personal data do we receive?	2
How do we use personal data?	4
How and to whom do we share personal data?	6
Privacy Rights and Choices	7
Children	7
Our contact details	8
Data storage	8
More information about data protection in Europe	8
Privacy Rights in the State of California and Other States of the United States	10
Changes to this Privacy Notice	12

# Privacy Policy Ploito

*Last update: 05 April 2023 y*

This Privacy Policy describes the types of personal data collected and/or processed (including collection, organization, structuring, storage, use or disclosure) in the provision of products and services offered directly by **IE Kasumov T. E.** under the registered trademark "Ploito" (hereinafter referred to as "Ploito"), including the ploito.com app website and its subdomains, as well as conferences, webinars, technical platform.

This Privacy Policy governs the protection of personal data for Ploito account owners (hereinafter referred to as "companies") and employees of the company. A company owner is a legal or individual person who has registered a company in Ploito. The company owner creates one or more employees to work in the company and can make profile information for all employees and access the relevant information. An employee of a company is an individual person who has access to a company. Only authorized employees and the company owner have access to the data located in the company.

## What personal data do we receive?

Personal data is any information relating to an individual identified or determined on the basis of such information (subject of personal data). We may collect or process on behalf of our customers the following categories of personal data when you use or interact with Ploito products and services:

- **Information from the account:** last name, first name, middle name of the owner, display name, image, live avatar video translation (minimum resolution video that allows your colleagues and the Ploito app to identify that you are at the workplace at the computer, hereinafter referred to as the live avatar), contact information (including phone number and email address), date of birth, account ID, billing information, and account transaction and billing information
- **User information:** last name, first name, middle name, display name, picture, live avatar video translation, date of birth, contact information (including phone number and email address), job title information, user ID, or other information provided by the user and/or owner his account

- **Settings:** information related to Ploito account or user profile preferences and settings, including audio and video settings, screen sharing settings, rest and warm-up breaks, gesture usage, and other settings and configuration information
- **Registration Information:** information that people provide when registering for Ploito meetings and webinars, or to access the recording, which may include name, contact information, answers to questions asked during registration, and other registration information requested by the host
- **Device information:** information about computers and other devices used when interacting with the Ploito app, which may include information about speakers, microphone and camera, OS version, hard drive ID, computer name, MAC address, IP address (which may be used to identify general location by city or country), device properties (such as operating system version and battery level), Wi-Fi network information, and other device information (such as Bluetooth signals)
- **Content and context from messaging and other collaboration features:** audio and text messages sent in Ploito app chats, files as well as cabinet names, drawing board content, kanban, calendar events; the contents of the work plans for the day (there-lists), including comments on the completed working day; live avatars video translations; screen demonstration; video translations
- **Usage information by Conferencing, Webinar, Messaging, Collaboration Features:** information about how users and their devices interact with the Ploito app, such as when users turn live video on and off; whether users sent messages and with whom they communicated; whether they moved to other virtual offices; mouse movements, clicks, keystrokes, or actions (such as mute/unmute audio or mute/unmute live video); features used (e.g. screen sharing, emoji); user performance metrics (e.g., throughput, focus, continuity, work stability, satisfaction, fatigue, burnout, rating) and other usage information and metrics. It also includes information about when and how users visit and interact with Ploito websites, including which pages they visit, as well as their interaction with website features.

communicated; whether they moved to other virtual offices; mouse movements, clicks, keystrokes, or actions (such as mute/unmute audio or mute/unmute live video); features used (e.g. screen sharing, emoji); user performance metrics (e.g., throughput, focus, continuity, work stability, satisfaction, fatigue, burnout, rating) and other usage information and metrics. It also includes information about when and how users visit and interact with Ploito websites, including which pages they visit, as well as their interaction with website features.

- If you choose to use gestures to enable video translation (if available), your device may process information about your hand movements to apply the selected features. This data is not stored or used to identify you personally. They are applied in real time only to trigger the gesture
- Ploito also keeps track of the position of your face in front of the camera. This is necessary so that the camera does not lose your face if you move slightly away from the computer. This data is not stored or used to identify you personally. They are used only for telepresence accounting
- **Communications with Ploito:** information about your communications with Ploito, including questions related to support, your account, and others
- **Information from Partners:** Ploito may receive information from third party advertising partners that advertise within Ploito's products and services, such as whether you clicked on an advertising link that was displayed

## How do we use personal data?

The Ploito app does not record live video, live avatars, or screenshare recording, which means that Ploito does not own or store the content of live video, live avatars, or screenshares. These processes occur in real time and cannot be reviewed, transferred, downloaded or deleted.

Ploito employees will not be able to connect to live video, Ploito chat messaging, screen sharing, or any content created or shared through other collaboration features (such as kanban, whiteboard, or calendar) beyond unless the account

owner has asked a Ploito employee to connect to the account to resolve a technical or other issue.

**Ploito uses personal information to:**

- To provide products and services to account owners and users; to provide customer support; to manage relationships and arrangements with account owners, including billing, compliance with contractual obligations; to provide the functions of the application (turning on the video translation with a gesture, face control, video translation of a live avatar, generating performance metrics, accounting for telepresence, etc.)
- Product Research and Development: to develop, test, and improve Ploito products and services, and to troubleshoot products and services.
- Marketing, promotion and third-party advertising: to allow Ploito and/or third-party advertising partners to offer, advertise and promote Ploito products and services, including data about your visit to our websites, information about the date and method of visit, and your interactions with the web -site. In addition, we may use this information to provide you with advertising related to Ploito products and services or to engage third party partners to analyze your interactions on our website or app. Ploito employees do not use chat content (such as audio and text messages, shared files), kanban, or any content created or shared through other collaboration features (such as a whiteboard) for any purpose. - either marketing or advertising.
- Authentication, integrity, security and protection. To authenticate accounts and activities, to detect, investigate and prevent malicious behavior, fraudulent or unsafe activities, address security threats, safeguard public safety, and protect Ploito products and services.
- Communication with you. We use personal data (including contact information) to contact you about Ploito products and services, including product updates, your account, and changes to our policies and terms of use. We also use your information to provide you with answers to your inquiries addressed to us.
- Legal grounds. To comply with applicable law, to respond to applicable legal process, including by law enforcement or government agencies, to investigate or participate in the disclosure of a civil case, litigation or other adversarial proceeding, to protect us, you and others from fraudulent,

malicious, fraudulent or illegal activities or abuse, or to enforce or investigate potential violations of our Terms of Service or policies.

## **How and to whom do we share personal data?**

Ploito will only share personal data with third parties with the appropriate consent or if one of the following circumstances occurs (subject to obtaining your prior consent, if required by applicable law):

**Suppliers:** Ploito works with third party service providers to provide, support and improve Ploito's products and services, as well as the technical infrastructure and business services such as payment processing. The relevant providers may access personal data subject to contractual and technical requirements adopted to protect personal data, and subject to the prohibition of using personal data for any purpose other than providing Ploito services, and as required by law. Ploito may integrate third-party technologies to provide advanced features such as facial and hand positioning and gestures. This information is processed on your device, but neither any third party nor Ploito receives or stores such information.

**Legal Basis:** Ploito may share personal data as necessary to: (1) comply with applicable law or respond to, investigate, or participate in ongoing legal process and proceedings, including those undertaken by law enforcement or government agencies; (2) enforce or investigate possible violations of the Terms of Service or policies

**Marketing, advertising and analytics partners:** Ploito may use third party marketing, advertising and analytics service providers to provide statistics and analytics about how people use Ploito products and services, including our website, including targeted advertising based on your use of our website. -site. The relevant third party partners may receive information about your activities on the Ploito website through third party cookies placed on the Ploito website. To prevent the use of third-party cookies that share data with their respective partners, open the cookie management tool in your cookie settings. Where required by law, Ploito is required to obtain your prior consent before engaging in the marketing and promotional activities described herein.

**Change of control:** We may share personal data with actual or potential buyers, their representatives and other participants, or in the course of negotiations for any sale, merger, acquisition, restructuring or change of control relating to all or

part of Ploito's business or assets, including in connection with bankruptcy or other similar proceedings.

## **Privacy Rights and Choices**

If you are located in the European Economic Area (EEA), Switzerland or the United Kingdom, or reside in California or another US state, please see the relevant sections below. Otherwise, at your request and as required by applicable law, we:

- Inform you about the personal data we control about you;
- Change or correct the relevant personal data or any privacy settings you have previously selected or direct you to the necessary tools;
- Delete the relevant personal data or direct you to the necessary tools inside the Ploito app

To exercise any of your rights regarding personal data controlled by Ploito, please email [privacy@ploito.com](mailto:privacy@ploito.com). Where permitted by law, we may refuse to process requests that are repeatedly and systematically submitted without reasonable grounds, requiring unreasonable technical effort. As a business owner or employee, you can also take steps that affect your personal information by logging into your account and directly changing your personal information.

It is important that if an employee of the company was deleted, then his messages in general and office chats (text and audio messages, attachments) remain, but are deleted: his image, personal chats with all messages (text and audio messages, attachments), his account in the list of all employees, any statistics on the employee.

## **Children**

Ploito does not allow children under the age of 18 to register Ploito owner accounts.

Educational organizations using Ploito products and services to provide educational services to children under 18 should review Ploito's Privacy Policy. Children's personal information is subject to the same privacy policies as those over the age of 18.

## Our contact details

To exercise your rights, please email [privacy@ploito.com](mailto:privacy@ploito.com) here. If you have privacy-related questions or comments regarding this privacy policy, please send an email to [privacy@ploito.com](mailto:privacy@ploito.com).

## Data storage

We retain personal data for as long as necessary to use it for the purposes described in this Privacy Policy, unless applicable law provides for a longer retention period.

The criteria used to determine retention periods include the following:

- The length of time we maintain a relationship with you and provide you with Ploito products and services (for example, as long as you have an account with the owner or employee of the company);
- Changes made by account owners or their employees, as well as deletion of information using their accounts;
- We have legal data retention obligations (for example, certain laws require us to keep a record of your transactions for a certain period of time before deleting them);
- The appropriateness of retention based on our legal position (for example, the need to enforce our agreements, dispute resolution, as well as applicable statute of limitations, litigation or regulatory investigations).

## More information about data protection in Europe

### Rights of data subjects

If you are located in the EEA, Switzerland or the UK, your rights in relation to your personal data processed by us as a controller include in particular the following:

- **Right of access and/or portability:** You have the right to access any of your personal data that we hold, and in some cases this data may be provided to you so that you can transfer or “port” it to another service provider.



- **Right to deletion:** in certain circumstances, you have the right to delete your personal data that we hold (for example, if it is no longer necessary to fulfill the purposes for which it was originally collected).
- **Right to object to processing:** in certain circumstances, you have the right to ask us to stop processing your personal data and/or stop marketing communications with you.
- **Right to Amendment:** you have the right to request us to correct any inaccurate or incomplete personal data.
- **Right to restrict processing:** you have the right to ask us to restrict the processing of your personal data in certain circumstances (for example, if you believe that the personal data we hold about you is inaccurate or not legally held).

To exercise your rights, or if you have any other questions regarding our use of your personal information, please send a request to [privacy@ploito.com](mailto:privacy@ploito.com). Please note that we may ask you to provide us with additional information to verify your identity and determine whether you have the right to access the relevant personal data.

You also have the right to lodge a complaint with the relevant data protection authority. For more information, please contact the local data protection authority where you are located.

### **Legal basis for the processing of personal data**

We will only use your data in accordance with the law and in an open and fair manner. Depending on the type of personal data and the applicable context, when Ploito processes personal data of individuals located in regions such as the EEA, Switzerland and the United Kingdom, we take into account the following legal provisions, if applicable in your jurisdiction:

- **Necessity in terms of the Ploito User Agreement.** If you accept the Ploito User Agreement, we process your personal data in order to fulfill our obligations to provide you with products and services. If we are unable to process your personal data for these purposes, we cannot guarantee that all products and services will be provided to you.
- **Subject to specific revocable consents:** we rely on your prior consent to use cookies to engage advertising and analytics partners in order to provide tailored advertising and analyze the use of our website. You have the right to withdraw your consent at any time. To do this, open the cookie management tool in your cookie settings.

## **International data transfer**

Ploito operates worldwide. This means that personal data may be transferred, stored (for example, in a data center) and processed outside of the country or region in which it was originally collected and in which Ploito or its service providers serve customers or have facilities, including in the countries in which the conference participants or account owners who host the conferences or webinars in which you participate reside or are located, as well as in the countries where the recipients of the messages you send are located.

Therefore, by using Ploito products and services or by providing personal information for any of the above purposes, you acknowledge that your personal information may be transferred to or stored in the United States of America or other countries outside the EEA, Switzerland and the United Kingdom. These countries may have data protection rules that are different or less stringent than those in your country.

We protect your personal data in accordance with this Privacy Policy, wherever the relevant data is processed, and take appropriate contractual or other measures to protect it in accordance with applicable law. When transferring personal data of users from the EEA, Switzerland or the United Kingdom to a recipient located in a country located outside the EEA, Switzerland or the United Kingdom, which has not been found to provide an adequate level of data protection, we guarantee the transfer of data in accordance with the standard contractual clauses of the European Commission. Contact us if you would like more information on this subject.

## **Privacy Rights in the State of California and Other States of the United States**

Under certain US state laws, including the California Consumer Privacy Protection Act (CCPA) of 2018 [as amended by the California Consumer Privacy Protection Act (CPRA)], residents may have the right to:

- Access to the categories and specific types of personal data collected by Ploito, the categories of sources from which personal data is collected, the business purpose(s) for collecting personal data, and the categories of third parties to which Ploito shares personal data;

- Deletion of personal data due to certain circumstances.
- Correction of personal data due to certain circumstances
- Opting out of "selling" or sharing personal information to serve targeted ads. We do not sell your personal information in the traditional sense of the term. However, like many other companies, we may use advertising and analytics services designed to analyze your interaction with our website or application based on information obtained from cookies or other tracking systems, including to show you ads (for example, interest-based advertising, targeted advertising or contextual behavioral advertising). You can get more information and opt out of the use of cookies on our websites by indicating your preferences in your settings. California residents can also set a Global Privacy Control (GPC) signal for each browser system they use to participate to opt out of the "sale" or "transfer" of their personal information. Ploito has no factual knowledge that it "sells" or "transfers" the personal information of consumers under the age of 16.
- Appeal to reject a request. Some states provide residents with additional rights. If we refuse to process your request, you may have the right to appeal our decision. You can exercise this right by directly responding to our rejection or by sending a message to [privacy@ploito.com](mailto:privacy@ploito.com).

Ploito will not harm you in connection with your exercise of any of these rights, which is also consistent with the provisions on your rights set forth in state law.

**Confidential information.** Ploito receives information that may be considered confidential under certain state laws. Such information includes, for example, certain account information (financial information, login information), certain content and context from chats and other collaboration features. Ploito processes sensitive personal data to provide Ploito products and services, to research and develop products, to ensure authentication, integrity, protection and security, to communicate with you in accordance with legal grounds and with your consent. Ploito does not use or disclose personal data (as defined in the CCPA) for the purposes of inferring consumer characteristics or in any manner for which Ploito is required to grant a restriction under the CCPA. Under some laws, residents may be allowed to opt out of certain profiling related to automated processing that analyzes certain categories of an individual's information, and with possible legal or similar material consequences. Ploito does not engage in this type of profiling of individuals.

To exercise your rights, please email [privacy@ploito.com](mailto:privacy@ploito.com) To opt out of using cookies on our sites to serve interest-based advertising, please follow the instructions above. We will acknowledge receipt of your request within 10 business days and provide a reasonable response within 45 calendar days, or we will notify you of the reason for the delay in providing a response and a deadline for providing a response (up to 90 days in total may be delayed) in writing.

These rights are not absolute, are subject to exceptions and limitations, and may not be available to residents of all states. In some cases, permitted by law, we may refuse requests to exercise these rights. In order to process your requests for access, deletion and correction, we will need to verify your identity, and we reserve the right to request proof of your residence in the states. In order to verify your identity, we may require you to log into your current Ploito account (if applicable), provide a statement regarding your identity subject to liability for misrepresentation and/or additional information, such as at least two items of personal information relating to your account (which will be verified by comparison with information we have, such as profile information) or already in our possession, such as email address and phone number. We will review your customer request by comparing the information you provide with information we already have and will take additional steps to minimize the risk of fraud.

### **California publicity law**

California Civil Code Section 1798.83, also known as the Publicity Act, allows California residents to request information on an annual basis regarding the disclosure of their Personal Data (if applicable) to third parties for third party direct marketing purposes in the previous calendar year. We do not share Personal Data with third parties for third party direct marketing purposes.

### **Changes to this Privacy Notice**

We may amend this Privacy Policy from time to time to reflect changes in our collection and/or processing of personal data, provided that the updated Privacy Policy is posted on our website along with the "Last Updated" date at the top of the page. When we make material changes to this Privacy Policy, we will notify you and provide you with an opportunity to review them before you decide to continue using our products and services.