

Privacy Policy of otonomi.ai

This Application collects some Personal Data from its Users.

Owner and Data Controller

Otonomi, Inc.
1201 N. Market St, Suite 2300
Wilmington, DE 19801

Owner contact email: founders@otonomi.ai

Types of Data collected

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: first name; last name; company name; email address; Tracker; Usage Data; gender; date of birth; phone number; physical address; password; Tax ID; country; state; ZIP/Postal code; Social Security number (SSN); city; User ID; billing address.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Application.

Unless specified otherwise, all Data requested by this Application is mandatory and failure to provide this Data may make it impossible for this Application to provide its services. In cases where this Application specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools – by this Application or by the owners of third-party services used by this Application serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy.

Users are responsible for any third-party Personal Data obtained, published or shared through this Application.

Mode and place of processing the Data

Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Contacting the User, Analytics, Infrastructure monitoring, Registration and authentication provided directly by this Application, Traffic optimization and distribution, Tag Management, Platform services and hosting, Displaying content from external platforms and Handling payments.

For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

Analytics

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

Google Analytics (Google LLC)

Google Analytics is a web analysis service provided by Google LLC ("Google"). Google utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).

Contacting the User

Contact form (this Application)

By filling in the contact form with their Data, the User authorizes this Application to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data processed: company name; email address; first name; last name.

Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of this Application and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

Google Fonts (Google LLC)

Google Fonts is a typeface visualization service provided by Google LLC that allows this Application to incorporate content of this kind on its pages.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Handling payments

Unless otherwise specified, this Application processes any payments by credit card, bank transfer or other means via external payment service providers. In general and unless where otherwise stated, Users are requested to provide their payment details and personal information directly to such payment service providers. This Application isn't involved in the collection and processing of such information: instead, it will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.

Sila

Electronic Fund Transfers (EFTs) and Account Balances . Otonomi, Inc partners with financial services

software company Sila Inc. (Sila) and banking services provider Evolve Bank & Trust (Evolve), member FDIC, to offer you electronic fund transfers (EFTs). When you create an Otonomi, Inc account, link a bank account, or initiate an EFT, you are authorizing us to share your identity and banking information with Sila and Evolve to support your account. You are also agreeing to the terms of Sila's privacy policy, <https://silamoney.com/privacy-policy/>, Evolve's privacy policy, <https://www.getevolved.com/privacy-policy/>, and Evolve's communications consent and disclosure, <https://silamoney.com/evolve-electronic-communications-consent-and-disclosure/> (the "Partner Terms"). It is your responsibility to make sure the data you provide us is accurate and complete, which is necessary for our partners to process EFTs on your behalf. The Partner Terms may be modified from time to time, and the governing versions are incorporated by reference into this Privacy Policy. Any term not defined in this section but defined in the Partner Terms assumes the meaning as defined in the Partner Terms. IT IS YOUR RESPONSIBILITY TO READ AND UNDERSTAND THE PARTNER TERMS BECAUSE THEY CONTAIN TERMS AND CONDITIONS CONCERNING YOUR OTONOMI, INC ACCOUNT, INCLUDING BUT NOT LIMITED TO USE OF YOUR PERSONAL INFORMATION.

California Privacy Rights. If you are a resident of the State of California, under the California Consumer Privacy Act (CCPA), you have the right to request information on how to exercise your disclosure choice options from companies conducting business in California. Specifically:

Exercising the Right to Know. You may request, up to twice in a 12-month period, the following about the personal information collected on you in the past 12 months:

- the categories and specific pieces of personal information we have collected;
- the categories of sources from which we collected the personal information;
- the business or commercial purpose for which we collected it;
- the categories of third parties with whom we shared the personal information; and
- the categories of personal information about you that we disclosed for a business purpose.

Exercising the right to delete. You may request that we delete the personal information we have collected from you, subject to certain limitations under applicable law.

Exercising the right to opt-out from a sale. You may request to opt out of any "sale" of your personal information that may take place.

Non-discrimination. The CCPA provides that you may not be discriminated against for exercising these rights. To submit a request to exercise any of the rights described above, you may contact Otonomi, Inc either via email to support@otonomi.ai or contact us via postal mail, proper postage prepaid, at:

Otonomi, Inc
Attn: Your California Privacy Rights
188 Grand Street
Unit #423
New York, NY 10013

Please indicate your preference as to how you would like us to respond to your request (i.e., email or postal mail). All requests sent via postal mail must be labeled "Your California Privacy Rights" on the envelope or postcard and clearly stated on the actual request. For all requests, please include your name, street address (if you would like a response via postal mail), city, state, and zip code. We may need to verify your identity before responding to your request, such as verifying that the email address or contact information from which you send the request matches your email address or contact information that we have on file. Authentication based on a government-issued and valid identification document may be required. We will not accept requests via telephone or fax. We are not responsible for notices that are not labeled or sent properly, or do not have complete information.

Infrastructure monitoring

This type of service allows this Application to monitor the use and behavior of its components so its performance, operation, maintenance and troubleshooting can be improved. Which Personal Data are processed depends on the characteristics and mode of implementation of these services, whose function is to filter the activities of this Application.

Sentry (Functional Software, Inc.)

Sentry is a monitoring service provided by Functional Software, Inc. .

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States - [Privacy Policy](#).

Platform services and hosting

These services have the purpose of hosting and running key components of this Application, therefore allowing the provision of this Application from within a unified platform. Such platforms provide a wide range

of tools to the Owner – e.g. analytics, user registration, commenting, database management, e-commerce, payment processing – that imply the collection and handling of Personal Data. Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

Webflow (Webflow, Inc.)

Webflow is a platform provided by Webflow, Inc. that allows the Owner to build, run and host this Application. Webflow is highly customizable and can host websites from simple blogs to complex e-commerce platforms.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt out](#).

Registration and authentication provided directly by this Application

By registering or authenticating, Users allow this Application to identify them and give them access to dedicated services. The Personal Data is collected and stored for registration or identification purposes only. The Data collected are only those necessary for the provision of the service requested by the Users.

Direct registration (this Application)

The User registers by filling out the registration form and providing the Personal Data directly to this Application.

Personal Data processed: billing address; city; company name; country; date of birth; email address; first name; gender; last name; password; phone number; physical address; Social Security number (SSN); state; Tax ID; User ID; ZIP/Postal code.

Tag Management

This type of service helps the Owner to manage the tags or scripts needed on this Application in a centralized fashion.

This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

Segment (Segment Inc.)

Segment is a tag management service provided by Segment.io, Inc.

Personal Data processed: Tracker; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Traffic optimization and distribution

This type of service allows this Application to distribute their content using servers located across different countries and to optimize their performance.

Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between this Application and the User's browser. Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information of the User are transferred.

jsDelivr (Prospect One Sp. z o.o. sp. k.)

jsDelivr is a traffic optimization and distribution service provided by Prospect One Sp. z o.o. sp. k.

Personal Data processed: Usage Data.

Place of processing: Poland – [Privacy Policy](#).

Cookie Policy

This Application uses Trackers. To learn more, Users may consult the [Cookie Policy](#).

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Application or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, this Application and any third-party services may collect files that record interaction with this Application (System logs) or use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within this Application and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

Definitions and legal references

Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

Usage Data

Information collected automatically through this Application (or third-party services employed in this Application), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using this Application who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Processor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the Owner of this Application.

This Application

The means by which the Personal Data of the User is collected and processed.

Service

The service provided by this Application as described in the relative terms (if available) and on this site/application.

European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

Tracker

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

Legal information

This privacy policy relates solely to this Application, if not stated otherwise within this document.

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