

Privacy Policy

Effective: 22 July 2024

This Privacy Policy (“Policy”) describes how RetroFix AI, Inc. (“Retrofix AI,” “we,” “our,” “us”) collects, uses, and discloses certain personal information obtained through our website (“Site”), which is located at <https://www.retrofix.ai/>, as well as information that we process as part of our services (collectively with the Site, the “Services”). By using our Services, you are agreeing to the terms of this Policy.

What Information We Collect and Maintain About You

We collect personal and other information from you directly when you provide it to us through our Services. We also automatically collect certain information about you and your computer, smartphone, or other device when you use, access, or interact with our Services. We may also collect information from third parties in relation to providing you our Services.

Personal information collected from registered users. If you create an account to use our Services, we will collect information from you related to maintaining your account. This may include your name, email address, and password.

Other personal information collected through the Site. You can visit our Site without submitting any information that we can use to identify you personally. However, to use certain features on the Site, such as the “Contact Us” feature, you will be required to provide personal information. Such information could include, for example, your name, company, email address, and any message you chose to provide us.

Web log data. When you use the Services, we automatically receive and record certain information from your computer (or other device) and your browser. This may include such data as your IP address and domain name, the pages you visit on the Services, the date and time of your visit, the files that you download, the URLs from the websites you visit before and after navigating to the Services, your software and hardware attributes (including device IDs), your general geographic location (e.g., your city, state, or metropolitan region), and certain cookie information (see below). To obtain such information, we may use web logs or applications that recognize your computer and gather information about its online activity.

Cookies. We use cookies on the Site. Cookies are small files that are stored on your computer by your web browser. A cookie allows the Site to recognize whether you have visited before and may store user preferences and other information. For example, cookies can be used to collect or store information about your use of the Site during your current session and over time (including the pages you view and the files you download), your computer’s operating system and browser type, your Internet service provider, your domain name and IP address, your general geographic location, the website that you visited before visiting the Site, and the link you used to leave the Site. If you are concerned about having cookies on your computer, you can set your browser to refuse all cookies or to indicate when a cookie is being set, allowing you to decide whether to accept it. You can also delete cookies from your computer. However, if you choose to block or delete cookies, certain features of the Site may not operate correctly.

Web beacons. The Site or the emails that you receive from Retrofix AI may use an application known as a “web beacon” (also known as a “clear gif” or “web bug”). A web beacon is an

electronic file that usually consists of a single-pixel image. It can be embedded in a web page or in an email to transmit information, which could include personal information. For example, it can allow an email sender to determine whether a user has opened a particular email.

Third-party online tracking. We may partner with certain third parties to collect, analyze, and use the personal and other information described in this section. For example, we may allow third parties to set cookies or use web beacons on the Site or in email communications from us. This information may be used for a variety of purposes, as discussed below (see “With Whom and Why We Share Your Information”).

How We Use and Process Your Information

We use the information that we collect (described in “What Information We Collect and Maintain About You,” above) for a variety of purposes. Our legal bases for processing your personal information are: 1) our legitimate interest in running and maintaining our business; 2) performance and fulfillment of our contracts; 3) your consent; and 4) compliance with our legal obligations. In many instances, more than one of these legal bases apply to the processing of your personal information.

The purposes for which we use your information include to:

- Provide you with our Services and fulfill the terms of any agreement you have with us;
- Respond to your questions or requests concerning the Services;
- Fulfill your requests for our Services or otherwise complete a transaction that you initiate;
- Send you information about our Services, including operational communications and other topics that are likely to be of interest to you;
- Improve your user experience and the quality of our Services
- Analyze how visitors use the Services and various features, including to count and recognize visitors to the Services;
- Comply with legal and/or regulatory requirements;
- Aggregate and deidentify information;
- Create new products and services; and
- Manage our business.

We may link information gathered through our Services with information that we collect in other contexts. But in that event, we will handle the combined information in a manner consistent with this Policy.

With Whom and Why We Share Your Information

We may share any of the information described in “What Information We Collect and Maintain About You,” above, with other parties for a variety of purposes, as described below.

Third-party service providers. Retrofix AI uses third-party service providers that perform services on our behalf, including web-hosting companies, payment service providers, artificial intelligence engine providers, customer support services and analytics providers. These service providers may collect and/or use your information, including information that identifies you personally, to assist us in achieving the purposes discussed above.

We may share your information with other third parties when necessary to fulfill your requests for Services; to complete a transaction that you initiate; to meet the terms of any agreement that you have with us; or to manage our business.

Analytics. We may partner with certain third parties to obtain the automatically collected information discussed above and to engage in analysis, auditing, research, and reporting. These third parties may use web logs or web beacons, and they may set and access cookies on your computer or other device.

Legal purposes. We may use or share your information with third parties when we believe, in our sole discretion, that doing so is necessary:

- To comply with applicable law or a court order, subpoena, or other legal process;
- To investigate, prevent, or take action regarding illegal activities, suspected fraud, violations of our terms and conditions, or situations involving threats to our property or the property or physical safety of any person or third party;
- To establish, protect, or exercise our legal rights or defend against legal claims; or
- To facilitate the financing, securitization, insuring, sale, assignment, bankruptcy, or other disposal of all or part of our business or assets.

Aggregated and de-identified information. From time to time, Retrofix AI may share aggregated or de-identified information about users, such as by publishing a report on trends in the usage of the Services. Such aggregated information will not identify you personally.

Your Privacy Rights

If you want to learn more about the personal information that Retrofix AI has about you, or you would like to update, change, or delete that information, please contact us by email at founders@retrofix.ai.

If you are a resident of a jurisdiction with an applicable data privacy law, you may have certain rights available to you in relation to your personal information. These rights may include:

- The right to access your personal information (including a data portability request);
- The right to correct or amend any personal information we have on file about you;
- The right to delete your personal information;
- The right to limit the use of your “sensitive” personal information;
- The right to opt-out of the sale or “sharing” of your personal information;
- The right to opt-out of the use of your personal information for targeted advertising purposes;
- The right to restrict or object to the processing of your personal information (such as for direct marketing purposes);
- The right to restrict or opt-out of the use of your personal information for certain automated decision-making (including profiling in furtherance of decisions that produce legal or similarly significant effects);
- The right to revoke your consent (to the extent applicable);
- The right to confirm whether personal information about you is being processed;
- The right to obtain a list of specific third parties (or categories of third parties) to which we have disclosed your personal information or any personal information.

To exercise any of the rights listed above, please contact us via email at founders@retrofix.ai

We will respond to your request as soon as reasonably possible and within the timeframe required under applicable law. You may appeal any decision we make in response to such request in accordance with applicable law. Appeals may be submitted to founders@retrofix.ai with the subject line *“Appeal of Decision Related to Privacy Rights Request.”*

Prior to complying with your request, we will first verify your identity by comparing the information you provide with the information we have on file for you.

You may authorize an agent to make a request on your behalf. To designate an agent, please provide a written and signed document by both you and the agent that authorizes the agent to act on your behalf. You may also use a power of attorney. We will still require you to provide information to allow us to reasonably verify that you are the person about whom we collected personal information.

External Links

Our Services may contain links to third-party websites. If you use these links, you will leave the Services. We have not reviewed these third-party sites and do not control and are not responsible for any of these sites, their contents, or their privacy policies. Thus, we do not endorse or make any representations about them, or any information, software, or other products or materials found there, or any results that may be obtained from using them. If you decide to access any of the third-party sites listed on our website, you do so at your own risk.

Data Security

We employ physical, technical, and administrative procedures to safeguard the personal information we collect online. However, no website is 100% secure, and we cannot ensure or warrant the security of any information you transmit to the Services or to us, and you transmit such information at your own risk.

Data Retention

We retain personal information about you necessary to fulfill the purpose for which that information was collected or as required or permitted by law. We do not retain personal information longer than is necessary for us to achieve the purposes for which we collected it.

International Users

The information that we collect through or in connection with the Services is transferred to and processed in the United States for the purposes described above. Retrofix AI may subcontract the processing of your data to, or otherwise share your data with, affiliates or third parties in the United States or countries other than your country of residence. The data protection laws in these countries may be different from, and less stringent than, those in your country of residence. By using the Services or by providing any personal or other information to us, you expressly consent to such transfer and processing.

Children

Content on the Services is directed at individuals over the age of 18 and is not directed at children under the age of 13. We do not knowingly collect personally identifiable information from children under the age of 13.

Changes to this Policy

We may make changes to the Services in the future and as a consequence will need to revise this Policy to reflect those changes. We will post all such changes on the Site, so you should review this page periodically. If we make a material change to the Policy, you will be provided with appropriate notice.

How to Contact Us

Should you have any questions or concerns about this Policy, you can contact us at founders@retrofix.ai.