

PRIVACY POLICY

Between

1. Introduction

- 1.1. Unless otherwise defined in this Privacy Policy, capitalized terms shall have the same meaning as set forth in the Terms of Use of the Between AI Agent Marketplace.
- 1.2. This Privacy Policy explains how Betweenai Limited collects, uses, stores, and protects personal data in connection with the Marketplace, including any personal data you provide or that we collect when you use the Marketplace.
- 1.3. This Privacy Policy applies to all natural persons who interact with the Marketplace, including but not limited to (i) Contributors, (ii) users, (iii) customers, and (iv) visitors/browsers of the Marketplace, and any other individuals who interact with us or whose personal data is otherwise processed in relation to the Marketplace. It applies regardless of the device or method you use to access the Marketplace.
- 1.4. We are committed to protecting your privacy and handling your personal data in accordance with applicable data protection laws. This Privacy Policy describes our practices in a clear and transparent manner, so that you understand what data we collect, the purposes for which we process it, and the rights available to you.

2. What data is collected?

- 2.1. We collect and process different categories of personal data (“**Personal Data**”) in connection with your use of the Marketplace. Depending on how you interact with us, this may include (without limitation):
 - (a) Account and Contact Information: such as your name, username, email address, telephone number, mailing address, profile picture (if provided), and authentication credentials.
 - (b) Identity Verification Data: if required for compliance or payment processing, such as government-issued identification documents, identification number, or proof of address.
 - (c) Financial and Transactional Data: such as payment account details (e.g., bank or payment processor identifiers), payout information, tax-related information, and records of Marketplace transactions, including amounts paid or received.
 - (d) Content and Contribution Data: including AI Agents, prompts, code, models, or any other material you upload, create, or publish on the Marketplace, as well as associated metadata and descriptions.

- (e) Usage Data: such as logs of interactions with the Marketplace (including pages visited, AI Agents used or purchased, prompts entered, ratings and reviews submitted, and communication with other users or support).
 - (f) Technical and Device Data: such as IP address, browser type and version, operating system, device identifiers, language settings, time zone, and information collected through cookies, pixels, or similar technologies.
 - (g) Communications: including messages, support requests, feedback, or other correspondence with us or other Marketplace users through our platform.
 - (h) Sensitive Data: generally, we do not require or intend to collect sensitive personal data (such as biometric or health data). If you voluntarily upload or include such data within the Marketplace, you are responsible for ensuring you have the lawful basis and necessary consents to do so.
- 2.2. We also collect information automatically through cookies and similar technologies to operate and improve the Marketplace, including analytics, performance, and security data.

3. When is the data collected?

We collect Personal Data in connection with your interaction with the Marketplace, including (without limitation) when:

- (a) You provide it directly, for example when you create an account; create, publish, or manage AI Agents; submit prompts, configurations, training data or other content; set profile details; submit support requests; or provide payout/tax information.
- (b) You use the Marketplace, where we automatically collect technical and usage information (e.g., IP address, device and browser details, timestamps, pages/features used, AI Agents interacted with, prompts and outputs metadata). We also use cookies and similar technologies.
- (c) You engage in community features, such as posting reviews/ratings, comments, or messaging other users; we may process such content for moderation, safety, fraud prevention, and policy enforcement.
- (d) You participate in our marketing or programs, such as newsletters, webinars, surveys, beta tests, promotions, or events.
- (e) You communicate with us, including through email, chat, support channels, or calls (we may retain records of such communications).

- (f) We receive data from third parties, such as payment and payout providers (e.g., payment status, identifiers), identity verification/KYC providers, single sign-on or authentication services, analytics/advertising partners (subject to your consent where required), and publicly available sources.

4. How do we use and process your data?

4.1. We at all times use and process your data in accordance with the applicable laws.

4.2. We collect and use Personal Data on the following legal bases:

- (a) Contract performance: to create and manage your Marketplace account, provide access to AI Agents, process transactions, and deliver Marketplace Services.
- (b) Legal obligations: to comply with applicable tax, regulatory, anti-fraud, anti-money laundering, and accounting requirements.
- (c) Legitimate interests: to secure, operate, improve, and market the Marketplace, provided that such interests are not overridden by your fundamental rights and freedoms.
- (d) Consent: for certain marketing activities, optional communications, or processing of special category data (if applicable). You may withdraw your consent at any time without affecting the lawfulness of processing based on consent before withdrawal.

4.3. Subject to the bases above, we use Personal Data for the following purposes (non-exhaustive)

- (a) to verify your identity and manage user authentication;
- (b) to process transactions, including allocation of revenue to Contributors;
- (c) to operate, maintain, and improve the Marketplace and its AI Agent infrastructure;
- (d) to provide technical support, respond to inquiries, and handle complaints;
- (e) to detect, prevent, and address fraud, abuse, or other harmful activity;
- (f) to comply with legal and contractual obligations, including record-keeping and reporting;
- (g) to send you updates, notices, and marketing communications (where permitted by law);

- (h) to analyse performance and usage trends to develop new features and offerings;
- (i) to ensure you can use interactive features of the Marketplace, including AI Agent publishing tools;
- (j) to disclose Personal Data to third parties (such as payment processors, cloud service providers, analytics providers, or legal/regulatory authorities) where necessary to provide services, meet legal obligations, or protect the security and integrity of the Marketplace;
- (k) To analyze user inputs and generate relevant outputs through AI-powered tools. This may involve transmitting your submissions to third-party LLM providers to process and return generated content; and
- (l) to improve the performance and accuracy of AI models and Marketplace features, provided that such use is conducted in an aggregated or anonymised manner or otherwise in compliance with applicable data protection laws, and, where required, based on your consent.

5. Your choices And rights

5.1. You may choose to limit or restrict our access to or use of Personal Data by:

- (a) Disabling cookies in your browser settings;
- (b) Choosing not to provide certain Personal Data;
- (c) Withdrawing your consent, where processing is based on your consent; or
- (d) Requesting us not to use your Personal Data for marketing purposes.

5.2. Please note that restricting access to or processing of certain Personal Data may affect the functionality of the Marketplace and the Marketplace Services we are able to provide, including access to features that rely on such data.

5.3. In accordance with applicable data protection laws, you have the following rights in relation to your Personal Data:

- (a) Right of access: You have the right to obtain confirmation as to whether we process your Personal Data, and to request access to such data.
- (b) Right to rectification: You have the right to request correction of any inaccurate or incomplete Personal Data. Some data may be updated directly through your account settings; for other changes, please contact us.

- (c) Right to erasure: You have the right to request the deletion of your Personal Data, subject to applicable legal and regulatory obligations that may require us to retain it.
- (d) Right to restrict processing: You have the right to request that we limit the processing of your Personal Data in certain circumstances (e.g., while we verify accuracy or in connection with a legal claim).
- (e) Right to data portability: You have the right to receive the Personal Data you have provided to us in a structured, commonly used, and machine-readable format and to request its transfer to another controller, where technically feasible.
- (f) Right to object: You have the right to object to the processing of your Personal Data on grounds relating to your particular situation, unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights, and freedoms, or the processing is required for the establishment, exercise, or defence of legal claims.
- (g) Right to withdraw consent: Where processing is based on your consent, you have the right to withdraw that consent at any time, without affecting the lawfulness of processing prior to withdrawal.

6. Security Of Data

- 6.1. We implement appropriate technical and organisational measures designed to protect Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise processed by us.
- 6.2. While we strive to use commercially reasonable means to protect your Personal Data, no method of transmission over the Internet or method of electronic storage is completely secure. Accordingly, although we take all reasonable steps to safeguard your Personal Data, we cannot guarantee its absolute security.
- 6.3. In the event of any personal data breach affecting your Personal Data, we will take steps in accordance with applicable laws, which may include notifying you and/or the relevant supervisory authority, where required.
- 6.4. Where we transfer Personal Data across borders, we ensure that appropriate safeguards are in place as required under applicable data protection laws.

7. Data Retention

- 7.1. We will retain your Personal Data only for as long as is necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting obligations, or to resolve disputes and enforce our agreements.
- 7.2. When determining the appropriate retention period for Personal Data, we consider the nature and sensitivity of the data, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process it, whether we can achieve those purposes through other means, and the applicable legal requirements.
- 7.3. Once the retention period has expired, or the Personal Data is no longer required, we will either securely delete, destroy, or anonymise it in accordance with applicable laws and our internal policies.
- 7.4. If you exercise your right to request erasure of your Personal Data, we will comply with that request unless we are required to retain certain information to comply with legal obligations or to establish, exercise, or defend legal claims.

8. Third Party Disclosures

- 8.1. We may share your Personal Data with carefully selected third parties where necessary to operate, improve, and promote the Marketplace and Marketplace Services. Such third parties may include, but are not limited to, our hosting and infrastructure providers, analytics and marketing partners, payment processors, auditors, professional advisers (such as lawyers and accountants), and, where required, law enforcement agencies and regulatory authorities.
- 8.2. Certain user submissions and interaction data may be securely transmitted to third-party Large Language Model (LLM) providers in order to analyze your input and generate responses.
- 8.3. All third parties engaged by us are required to handle Personal Data in accordance with applicable data protection laws, to use it only for the purposes for which it is disclosed, and to maintain appropriate confidentiality and security measures. Where such third parties act as our data processors, they process Personal Data only on our documented instructions. While we use reputable providers and take commercially reasonable measures to safeguard such data, we are not responsible for how those third-party systems store, process, or secure your data once transmitted, except as required by applicable law.
- 8.4. In the event of a corporate transaction, such as a merger, acquisition, restructuring, or sale of assets, your Personal Data may be transferred to the relevant successor entity as part of the transaction, provided that the receiving party agrees to process your Personal Data in accordance with this Privacy Policy and applicable law.
- 8.5. Where it is necessary to transfer your Personal Data to countries outside your jurisdiction, we will ensure that such transfers are carried out in compliance with

applicable data protection requirements. This may include using adequacy decisions, standard contractual clauses approved by relevant supervisory authorities, or other lawful transfer mechanisms designed to provide an equivalent level of protection for your Personal Data.

- 8.6. We do not sell or rent your Personal Data to third parties for their independent marketing purposes without your explicit consent.

9. Amendments And Supplements

- 9.1. We reserve the right to change or modify this Privacy Policy at any time. Any updated version will be posted with the date of the last update. If any material changes are made that significantly affect your rights or how we process your Personal Data, we will provide reasonable advance notice.
- 9.2. This Privacy Policy may be supplemented by additional privacy notices or policies where necessary to address specific features, services, or legal requirements.

10. Further Information

If you have any questions about this Privacy Policy, how we handle your Personal Data, or wish to exercise any of your rights under applicable data protection laws, please contact us using the details below.

11. Contact Us

If you have any queries or concerns, you can reach out to us through at betweenaiask@gmail.com