

Privacy Policy

Last Updated March 21, 2025

This Privacy Policy describes how Tucuxi, Inc. and its subsidiaries and affiliates (collectively “Tucuxi”) collect, use and share the information that you provide to us or that we gather from you while using the Tucuxi.AI website (the “Site”) or any apps or services we may offer via the Site or otherwise, including the Widdle Pupper app, the Euni(™) - US Law School app, and the Euni(™) - Legal Citation Checker (the “Services”) or that we gather from your interaction with us on SMS, Slack and/or any other online channels.

The terms used in this Privacy Policy have the same meanings as in our Terms of Use, which is accessible at Tucuxi.AI unless otherwise defined in this Privacy Policy.

What information do we collect?

Traffic Data

Tucuxi may collect data from visitors to our Site such as IP addresses, browser settings, internet service provider (ISP) information, referring/exit pages, operating systems, date/time stamps, and clickstream data (collectively “Visitor Data”). No Personally Identifiable Information is collected in this process. We may use Visitor Data to compile traffic data about the types of visitors who use the Site at specific intervals (collectively “Traffic Data”).

We may use Traffic Data to analyze Site traffic, but this information is not examined for Personally Identifiable Information (as defined below). We may also use Traffic Data to diagnose problems with our server, administer our Site, or display content according to your preferences. Visitor Data and Traffic Data may also be shared with business partners, affiliates, or advertisers on an aggregated and anonymized basis.

Cookies

Tucuxi may use the standard cookie feature of major browser applications and third-party providers, including Google Analytics, Webflow and Hubspot features (Remarketing, Google Display Network Impression Reporting, the DoubleClick Campaign Manager Integration and Google Analytics Demographics and Interest Reporting), or employ internally developed cookies and tracking codes, that allow Tucuxi to store a small piece of data on a visitor’s computer, or any other device a visitor uses to access Online Services, about his or her visit to the Site or use of Applications. Tucuxi does not capture Personally Identifiable Information in cookies or use cookies to mine Personally Identifiable Information. You can remove persistent cookies by following directions provided in your Internet browser’s “help” directory. If you reject cookies, you

may still use our site, but your ability to use some areas of our site may be limited.

3rd Party Tracking

The use of tracking technologies by our service providers, technology partners or other 3rd party assets (such as social media links) on the site is not covered by our Privacy Policy. These 3rd parties may use cookies, clear gifs, images, and scripts to help them better manage their content on our site. We do not have access or control over these technologies. We do not tie the information gathered to our users' Personally Identifiable Information.

Personal Information

Tucuxi may require each customer to provide us with personal information ("Personally Identifiable Information") to access and use Tucuxi products and services. Personally Identifiable Information may be captured when a visitor accesses the Services or speaks on the phone with a Tucuxi employee and willingly discloses that information. This disclosure may occur when a visitor registers and creates a login for the Services or otherwise engages with other aspects of Services offered by Tucuxi.

Personally Identifiable Information includes: (i) "Contact Data" (such as your name, address, city, state, zip code, phone number, and email address); (ii) "Financial Data" (such as your credit card number, expiration date, and verification code or bank account information); (iii) "Demographic Data" (such as your zip code and sex); and (iv) other "Legal Data" (such as your company information, and other sensitive information included in your Inputs (as defined in the Terms)). Where Tucuxi collects personally identifiable information Tucuxi uses this information for the sole purpose of administering its Services for our customers, and does not use such information for any other reason, except in cases where we are compelled to do so pursuant to applicable law or by a court order.

Testimonials and Reviews

We may display personal testimonials of satisfied customers. We will ask for your specific consent as part of the survey. If you wish to update or delete your testimonial, you can contact us at privacy@Tucuxi.ai. We may also display customer reviews. If you provide a review that we display and wish to update or delete it, you can also contact us at privacy@Tucuxi.ai.

Calls/Electronic Communication

In the regular course of our business, Tucuxi may monitor and record phone conversations, chat conversations, AI assistant conversations or email communications between you or your customers and Tucuxi employees or services for training and quality assurance purposes. We may receive confirmation when you open or click on content in an email from us, which helps us make our communications to you more useful and interesting. If you do not wish to receive email from Tucuxi, you may unsubscribe from our mailing list on any of the emails we send.

How do we use the information we collect and do we share the information we receive?

We use information we collect from the Services to communicate with you regarding use of our Services, information related to your account, provide you with our Service, provide technical support, provide user training, verify your identity when you sign into the Site, create invoices, manage our relationship with you, facilitate your transactions with our third-party marketing partners, and inform you of company news, updates, information related to our product or services. For example, you may receive a welcome email that confirms your username and password, and later receive communications responding to your inquiries, providing services you request, and managing your account. We occasionally send service-related announcements, for example, to alert you if we need to temporarily suspend the Site for maintenance.

Opting Out

We send promotional emails and newsletters from time to time to users who have registered on the site and to those who have opted in to receive such emails. Generally, you may not opt-out of service-related or transactional communications, which are not promotional. If you do not wish to receive service-related communications, you may terminate your account by contacting privacy@Tucuxi.ai. However, you can opt-out of promotional communications by following the unsubscribe instructions in any communication or by emailing us at privacy@Tucuxi.ai.

You may choose not to provide Tucuxi with Personally Identifiable Information or you may turn off cookies in your browser by changing its settings. If you make these decisions, you may continue to use the Site and browse its pages. However, we cannot enable logins to the Site or use of the Services without Personally Identifiable Information.

Service Providers

We may employ third-party companies and individuals due to the following reasons:

- To facilitate our Service;
- To provide the Service on our behalf;
- To perform Service-related services; or
- To assist us in analyzing how our Service is used.

We want to inform users of this Service that these third parties have access to your Personal Information. The reason is to perform the tasks assigned to them on our behalf. However, they are obligated not to disclose or use the information for any other purpose.

Security

We value your trust in providing us your Personal Information, thus we are striving to use commercially acceptable means of protecting it against loss, theft and unauthorized use,

disclosure, or modification, however, no method of transmission over the internet, or method of electronic storage is 100% secure and reliable, and we cannot guarantee its absolute security. Please keep your password secure and do not share your password with anyone else.

Your Consent

By using the Service, you are consenting to our processing of your information as set forth in this Privacy Policy now and as amended by us. "Processing" means using cookies on a computer/handheld device or using or touching information in any way, including, but not limited to, collecting, storing, deleting, using, combining and disclosing information, all of which activities will take place in the United States. If you reside outside the United States your information will be transferred, processed and stored there under United States privacy standards.

Links to Other Sites

This Service may contain links to other sites. If you click on a third-party link, you will be directed to that site. Note that these external sites are not operated by us. Therefore, we strongly advise you to review the Privacy Policy of these websites. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

EU Data Subject Rights

1. **Lawful Grounds.** If you reside in the European Economic Area or Switzerland (collectively the "EU"), we rely on the following lawful grounds under the General Data Protection Regulation ("GDPR") to process (collect, store, and use) your personal data: (a) it is necessary for the performance of a contract with you; (b) our or a third-party's legitimate business interest; or (c) your consent. Our subscribers determine the lawful grounds for the processing of personal data submitted through their use of our Services and we limit such processing to our subscribers' instructions.
2. **Data Transfer Notice.** We are located in the United States and transfer your personal data for processing in the United States. We make the transfer to the United States in the absence of an adequacy decision because it is necessary for the performance of a contract with you, or with your explicit consent. We also use model contractual clauses (or the then-lawful data transfer mechanism recognized under GDPR or other applicable law) with our subscribers to provide adequate protection for the transfer and processing of your personal data in the United States.
3. **Individual Rights and Data Requests.** We provide tools to our subscribers to respond directly to data subject requests to access, transfer, rectify or erase their personal data, or to restrict or object to the processing of their personal data. You may also contact us at support@Tucuxi.ai to request access to, transfer of, and rectification or erasure of your personal data, or restriction of processing, or to object to processing of your personal data, to the extent that we process such information on our own behalf. Please specify the nature of your request and the information that is the subject of your request. We may require you to submit additional information necessary to verify your identity

and

status as an EU data subject. If we are processing your personal data for a subscriber, we will forward your request to our subscriber and assist the subscriber in responding within 30 days. If you are a visitor to our Site, we will respond to your request directly within 30 days. If we are processing your personal data based upon the lawful ground of your consent, you have the right to withdraw your consent for such processing at any time without affecting the lawfulness of processing based on consent before it is withdrawn. To withdraw consent, please email us at privacy@Tucuxi.ai.

4. Retention. At a minimum and to the extent allowed under applicable law, we will retain your personal data for as long as necessary for the purpose in which it was collected, such as to deliver a Service, perform our obligations under a contract, for our or a third-party's legitimate interest, or your consent.

Children's Privacy

These Services do not address anyone under the age of 13. We do not knowingly collect personally identifiable information from children under 13. In the case we discover that a child under 13 has provided us with personal information, we immediately delete this from our servers. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us at privacy@Tucuxi.ai so that we will be able to take necessary actions.

Data Retention Policy

We will retain your information for the period necessary to fulfill the purposes outlined in this Privacy Policy and our agreement with you unless a longer retention period is required or permitted by applicable law. If you'd like us to delete any of your Personal Information that you have provided via the Service, please contact us at privacy@Tucuxi.ai and we will respond in a reasonable time. Please note that some or all of the Personal Information you have provided to us may be required in order for you to use the Service.

Changes to This Privacy Policy

We may update our Privacy Policy from time to time to ensure that it's up to date with evolving laws and regulations and our company practices. Please review this page periodically for any changes. We will notify you of any changes by posting the new Privacy Policy on this page. These changes are effective immediately after they are posted on this page. Your continued use of our Site and Services constitutes your agreement to this Privacy Policy and any updates to this Privacy Policy. This Privacy Policy was last updated on November 18, 2023.

Termination

If you wish to have your account and all associated data deleted from our systems, please email us at privacy@Tucuxi.ai.

Your California Privacy Rights

Section 1798.83 of the California Civil Code permits California residents to request from a business, with whom the California resident has an established business relationship, certain information about the types of personal information the business has shared with third parties for those third parties' direct marketing purposes and the names and addresses of the third parties with whom the business has shared such information during the immediately preceding calendar year. You may make one request each year by emailing us at privacy@Tucuxi.ai.

Contact Us

If you have questions or concerns regarding our privacy policy, please contact us at privacy@Tucuxi.ai.