

# Coding Leap Privacy Notice

**Last Updated:** July 3, 2023

Coding Leap, LLC (“Coding Leap,” “we,” “us,” and “our”) provides a platform allowing our customers to create and collaborate on mental mapping in virtual reality (“VR”) teleconferencing (the “Platform”). Our Privacy Notice (“Privacy Notice”) is designed to help you understand our practices regarding the collection, use, and disclosure of certain information, including your personal information, and to assist you in exercising your privacy rights.

## SCOPE

This Privacy Notice applies to information processed by us in the course of our business, including on our website (the “Site”), our VR application (the “App”), the Platform, and our related online and offline offerings (collectively, the “Services”).

## INFORMATION WE COLLECT

When you use our Services, we may collect the following kinds of information:

### Information You Provide to Us

**Your Communications with Us.** We collect personal information from you such as your email address, name, employer or other company with which you are associated, VR device type, and purchasing plans when you request information about our Services, register for our newsletter, request customer or technical support, or otherwise communicate with us.

**Teleconferencing.** The Services allow you to teleconference with other users within the virtual rooms using the sensors on your VR device. When you do this, audio and video of you and your surroundings will be captured by us and provided to other users along with an avatar constructed from your profile photo to enable VR teleconferencing.

**Interactive Features.** The Services allow you to upload images, documents, and attachments into virtual rooms so that you may easily share and collaborate with other individuals. We and others who use our Services may collect the information you submit or make available through these interactive features. Any content you provide via the public sections of these features will be considered “public” and is not subject to the privacy protections referenced herein. By using these interactive features, you assume the risk that the personal information provided by you may be viewed and used by third parties for their own purposes.

**Registration for Sweepstakes or Contests.** We may run sweepstakes and contests. Contact information you provide may be used to inform you about the sweepstakes or contest and for other promotional, marketing and business purposes, if permitted by law. In some jurisdictions, we are required to publicly share information of winners.

**Conferences and Trade Shows.** We may attend conferences and trade shows where we collect personal information from individuals who interact with or express an interest in Coding Leap and/or the Services. If you provide us with any information at one of these events, we will use it for the purposes for which it was collected.

**Business Development and Strategic Partnerships.** We may collect personal information from individuals and third parties to assess and pursue potential business opportunities.

## **Information Collected Automatically**

**Automatic Data Collection.** We may collect certain information automatically when you use the Services. This information may include your Internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, details about your browser, operating system or device, location information (including inferred location based off of your IP address), Internet service provider, pages that you visit before, during and after using the Services, information about the links you click, information about how you interact with the Services, including the frequency and duration of your activities, and other information about how you use the Services. Information we collect may be associated with accounts, other devices, virtual rooms, and teleconferences.

**VR Device Information.** We automatically collect camera, microphone, and telemetry information from your VR device when you use the Services. The telemetry information describes your VR device and how you use it, and may include information about the type of VR device, its configuration, and how it is performing. The telemetry information may

also describe other devices used in connection with the VR device such as a computer or mobile device, and information about your network connection. The telemetry information may additionally include information about your physical environment and movements within the environment. You may opt out of this collection by changing the settings on your VR device or other device. If you are using a shared VR device, you should ensure that its settings reflect your preferences before participating in a teleconference using the Services.

**Analytics.** We utilize Unity Analytics to optimize our users' experience. Unity collects device information, like IP address and device identifiers, as well as events completed or actions taken within Noda, including metadata about in-game communications, activities and the details of purchases. Coding Leap has ongoing access to this data. This collection and use of this data make it possible for your experience to operate as expected and allows Coding Leap to make decisions on optimal methods to run Noda. For more details on Unity Analytics, please visit <https://unity3d.com/legal/privacy-policy>.

## HOW WE USE YOUR INFORMATION

We use your personal information for a variety of business purposes, including to:

### **Provide the Services or Requested Information, such as:**

Fulfilling our contract with you; Managing your information; Responding to questions, comments, and other requests; Providing access to certain areas, functionalities, and features of the Services; Answering requests for customer or technical support; and Allowing you to register for events.

**Serve Administrative Purposes, such as:**

Pursuing legitimate interests, such as direct marketing, research and development (including marketing research), network and information security, and fraud prevention; Measuring interest and engagement in the Services; Improving our products and Services; Developing new products and services; Ensuring internal quality control and safety; Authenticating and verifying individual identities; Carrying out audits; Terms of Use and Privacy Notice changes; Preventing and prosecuting potentially prohibited or illegal activities; Enforcing our agreements; and Complying with our legal obligations.

**Consent.** We may use personal information for other purposes that are clearly disclosed to you at the time you provide personal information or with your consent.

**How We Use Automatic Collection Technologies.** Our uses of the automatic collection Technologies fall into the following general categories:

Operationally Necessary. This includes Technologies that allow you access to our Services that are required to identify irregular behavior, prevent fraudulent activity and improve security or that allow you to make use of our functions;

Performance Related. We may use Technologies to assess the performance of our Services, including as part of our analytic practices to help us understand how our visitors use the Services;

Functionality Related. We may use Technologies that allow us to offer you enhanced functionality when accessing or using our Services. This may include identifying you when you sign into our Services and keeping track of your specified preferences or past pages viewed;

# DISCLOSING YOUR INFORMATION TO THIRD PARTIES

Coding Leap does not sell, rent or lease its customer lists to third parties.

We may share your personal information with the following categories of third parties:

**Service Providers.** We may share any information we collect about you with our third-party service providers. The types of service providers to whom we entrust information include service providers for: (i) the provision of the Services; (ii) the provision of information, products, and other services you have requested; (iii) marketing and advertising; (iv) payment and transaction processing; (v) customer service activities; and (vi) the provision of IT and related services.

**Information Shared with Other Users.** When you use the Services, including when you use our teleconferencing services, certain information may be shared with other users. This information may include your account information (such as your name and your profile picture or avatar), documents you choose to present, and any audio or images of you or your surroundings that your VR device sensors capture while you engage in teleconferencing. Please be aware that Coding Leap has little or no control over how individuals may use the information you share.

**Disclosures to Protect Us or Others.** We may access, preserve, and disclose any information we store in association with you to external parties if we, in good faith, believe doing so is required or appropriate to: (i) comply with law enforcement or national security requests and legal process, such as a court order or subpoena; (ii) protect your, our, or others' rights, property, or safety; (iii) enforce our policies or contracts;

(iv) collect amounts owed to us; or (v) assist with an investigation and prosecution of suspected or actual illegal activity.

**Merger, Sale, or Other Asset Transfers.** If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, then your information may be sold or transferred as part of such a transaction as permitted by law and/or contract.

## INTERNATIONAL DATA TRANSFERS

You agree that all information processed by us may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States and other countries which may have data protection laws that are different from the laws where you live. We endeavor to safeguard your information consistent with the requirements of applicable laws.

## YOUR CHOICES

**General.** You may have the right to object to or opt out of certain uses of your personal information. Where you have consented to the processing of your personal information, you may withdraw that consent at any time by contacting us as described below.

**Email Communications.** If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails regarding products or Services you have requested. We may also send you certain non-promotional

communications regarding us and our Services, and you will not be able to opt out of those communications (e.g., communications regarding the Services or updates to this Privacy Notice).

**Mobile Devices.** We may send you push notifications through our App. You may at any time opt out from receiving these types of communications by changing the settings on your mobile device. With your consent, we may also collect precise location information if you use our App. You may opt out of this collection by changing the settings on your mobile device.

Please note you must separately opt out in each browser and on each device.

## **YOUR PRIVACY RIGHTS**

Depending upon your location and in accordance with applicable laws, you may have the right to:

**Access** personal information about you consistent with legal requirements. In addition, you may have the right in some cases to receive or have your electronic personal information transferred to another party.

**Request Correction** of your personal information where it is inaccurate or incomplete.

**Request Deletion** of your personal information.



**Request Restriction or Object to Processing** of your personal information, including the right to opt in or opt out of the sale of your personal information to third parties.

**Not be Discriminated Against** by us for exercising your privacy rights.

If you would like to exercise any of these rights, please contact us as set forth below. We will process such requests in accordance with applicable laws. To protect your privacy, we will take steps to verify your identity before fulfilling your request.

## **DATA RETENTION**

We retain the information we receive as described in this Privacy Notice for as long as you use our Services or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

## **SECURITY OF YOUR INFORMATION**

We take steps to ensure that your information is treated securely and in accordance with this Privacy Notice. We use reasonable administrative, logical, physical and managerial measures to safeguard your personal information against loss, theft and unauthorized access, use and modification. These measures are designed to provide a level of security appropriate to the risks of processing your personal information. Unfortunately, no measures can be guaranteed to be 100% secure, and we cannot ensure or warrant the security of any information you provide to us. To the fullest extent permitted by applicable law, we do not accept

liability for unintentional disclosure unless covered by another agreement.

By using the Services or providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Services. If we learn of a security system's breach, we may attempt to notify you electronically by sending a notice through the Services or by sending an e-mail to you.

## **THIRD PARTY WEBSITES/ APPLICATIONS**

The Services may contain links to other websites/applications and other websites/applications may reference or link to our Services. These third-party services are not controlled by us. We encourage our users to read the privacy policies of each website and application with which they interact. We do not endorse, screen or approve, and are not responsible for the privacy practices or content of such other websites or applications. Visiting these other websites or applications is at your own risk.

## **CHILDREN'S INFORMATION**

We do not knowingly collect personal information from children under the age of 18. If you learn that your child has provided us with personal information without your consent, you may contact us as set forth below. If we learn that we have collected any child's personal information in violation of applicable law, we will promptly take steps to delete such information.

## **SUPERVISORY AUTHORITY**

If you are located in the European Economic Area or the UK, you have the right to lodge a complaint with a supervisory authority if you believe our processing of your personal information violates applicable law.

## **CHANGES TO OUR PRIVACY NOTICE**

We may revise this Privacy Notice from time to time in our sole discretion. If there are any material changes to this Privacy Notice, we will notify you as required by applicable law. You understand and agree that you will be deemed to have accepted the updated Privacy Notice if you continue to use the Services after the new Privacy Notice takes effect.

## **CONTACT US**

If you have any questions about our privacy practices or this Privacy Notice, please contact us at: Coding Leap, LLC

4547 Waldrick Rd SE, Olympia, WA, 98501

[contact@noda.io](mailto:contact@noda.io)