

# GAEA Privacy Statement

Updated on May 15, 2025

Thank you for your interest in GAEA! This Privacy Statement explains how GAEA collects, uses, discloses, and otherwise processes information related to you that can directly identify you or make you identifiable ("Personal Information") to provide you with services.

In this Privacy Statement, when we use "GAEA", "GAEA Inc", "we", or "our", we refer to GAEA Corporation and its affiliated companies. When we use "Service" or "Services", we refer to all services and products provided by us as a data controller, including our website <https://aigaea.net/>, or any other GAEA Group products or services that post or link to this Privacy Statement.

## GAEA as a Data Controller

Under data protection laws, GAEA is a "data controller" (or similar term under applicable law) and is generally responsible for and controls the processing of Personal Information collected through your use of our Services. This Privacy Statement applies only when GAEA acts as a data controller.

## GAEA as a Data Processor

In the course of providing Services, our customers may collect data in our products and Services, or we may collect data on their behalf, which may include Personal Information or data about our customers' end users ("Customer Data"). In such cases, GAEA acts as a "data processor" (or similar term under applicable law) and we have contractually committed to process Customer Data on behalf of and in accordance with the instructions of the respective customer (data controller). This Privacy Statement does not apply to the processing of Customer Data. If a customer's processing of your Personal Information involves your Personal Information, we recommend that you read the respective customer's privacy statement.

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## 1. How We Collect Your Personal Information

We collect your Personal Information when you interact with us. Sometimes, we automatically collect Personal Information when you use our Services; sometimes, we collect it directly from you. Additionally, we may occasionally collect your Personal Information from third parties.

## Personal Information You Provide

We may collect the following Personal Information that you provide when using our Services:

- **Creating a GAEA Account and Completing Your Profile:** We may collect Personal Information you provide when registering an account (if any). This includes your email address and password. You may also add or confirm your name, wallet details, time zone, and contact/lead source.
- **Contract Data:** If your company enters into a contractual relationship with us, we may collect your name, job title, email address, signature (if a handwritten signature or copy thereof is used), customer name and address, and how you learned about us.
- **Payment and Transaction Information:** If you register for any paid Services, we will collect information you provide related to such payments. Please note that we use third-party payment processors to handle payments you make to us. Therefore, all such information is provided directly by you to our third-party payment processors. The payment processor's use of your Personal Information is governed by its privacy statement. We will only receive the last four digits of your credit card number and transaction-related information (e.g., payment date, amount, device type, IP address, and card type). For custom billing, we may also collect the account contact's name, email address, job title, company name, and address.
- **Communications:** When you contact us through any communication method, including via the "Contact Us", "Chat", or "Support" features on our website, or when you request a demo of the GAEA platform, we may collect your name, email address, mailing address, account ID, type of inquiry, or any other Personal Information you choose to provide to us, such as how many contacts you/your company has, which products you are interested in, the platform you are currently using, and meeting date and time.
- **Newsletters, Marketing Emails, and Blogs:** If you sign up to receive our news or alerts, or subscribe to our blog, we may collect your email address as well as relevant interests and communication preferences.
- **GAEA Community:** If you wish to engage with other GAEA users in the GAEA network and access resources, insights, and further support from other users, you may join the GAEA Community. In such cases, we may collect the following data: your account credentials, GAEA account ID, email address, and partner ID. Your account will also display a classification based on your level of engagement in the Community and badges based on your engagement/achievements (both of which can be managed in your profile settings to determine visibility to other Community users). Additionally, all content you share through Community features will be

displayed in your account. You may also add information such as your name, username, job title, city, country/region, avatar, social media accounts (Instagram and Twitter), and bio/signature, which may be visible to other Community users.

- **GAEA Partners:** If you apply to become a GAEA Partner, we may collect Personal Information you provide during registration (if any). This includes your name and email address.
- **Events, Surveys, Feedback, and Promotions (including contests, sweepstakes, webinars, and training courses):** If you fill out any forms or otherwise provide information to us in connection with GAEA events, surveys, or other promotional activities (including contests, sweepstakes, webinars, and training), as well as when you provide feedback to us, we may collect your contact information (e.g., your name, email address, and any other information you provide to us).

## Automatically Collected Personal Information

Like most digital platforms, when you access, use, or interact with our Services and emails, we and our third-party vendors and partners automatically collect certain Personal Information. Such information is collected through the use of Cookies and similar technologies (e.g., pixels and local storage objects (LSOs), such as HTML5, collectively referred to as "Cookies"). This helps us provide you with a good experience when using our Services and allows us to monitor and analyze how you use and interact with our Services to continuously improve them. Additionally, it helps us and our partners identify products and services that may be of interest to you.

Specifically, we may collect the following information:

- **Log Data:** Including your Internet Protocol (IP) address, operating system, browser details (e.g., type, ID, and configuration), unique identifiers, local and language settings; session logs, heatmaps, and scroll data; screen resolution, ISP, device type and version, referral URL, date/time of your visit, time spent on our Services, and any errors that may occur during your visit to our Services.
- **Analytics Data:** Including the electronic path of your access, use, and exit from our Services, UTM sources, as well as your usage and activities on our Services, such as time zone, activity information (first and last activity date and time), usage history (flows created, scheduled activities, emails opened, total logins), and pages, links, objects, products, and offers you view, click, or otherwise interact with. We may also analyze interactions between you and your customers when using our Services. Some data will be processed using artificial intelligence (AI), including generative AI and machine learning technologies.

- **Digital Behavioral Data:** Webpage interactions (clicks, hovers, focus, mouse movements, browsing, zooming, and other interactions), referral webpage/source of your website visit, and statistics related to interactions between your device or browser and the website.
- **Location Data:** Including your approximate geographic location determined based on the IP address we collect.
- **Platform Data:** If you have an account that uses Services we provide as a data processor, we may also collect your name, phone number, email address, company information, sales cycle status, lead and business details (e.g., platform-specific information, initial marketing channel), user and account IDs, and other identifiers (e.g., GAEA ID), user profile/historical data, account health status, event attendance, lead/account status, and integration information.

For more information about these practices and your choices regarding Cookies, please refer to our Cookie Notice.

## Personal Information from Other Sources and Third Parties

We may also obtain Personal Information from third parties and combine this information with Personal Information we automatically collect or collect directly from individuals.

We may receive Personal Information from the following third parties:

- **GAEA Business and Marketing Partners:** We may also disclose Personal Information to other business and marketing partners that co-provide products or services with us, conduct joint marketing or events, or are part of our partner ecosystem. The information we disclose may include your name, phone number, email address, and information about whether you are an existing customer of our partner.
- **Social Media:** When users interact with us through various social media networks, such as "liking" us on Facebook, following us, or sharing our content on Facebook, Twitter, Instagram, or other social networks through social media buttons embedded on our website, we may receive certain information that the user allows the social network to share with third parties. The data we receive depends on the user's privacy settings on the social network. Users should always review and adjust their privacy settings as needed before sharing information and/or linking or

connecting third-party websites, social media networks, and services to other services.

- **Service Providers:** Our service providers (e.g., chat services, payment processing, and marketing providers) that provide services specifically on our behalf collect Personal Information and often share some or all of such information with us.
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## 2. How We Use Your Personal Information

We may use the collected Personal Information for the following purposes:

- Communicate with individuals, including via email, SMS, social media, and/or phone and video calls;
- Evaluate our business performance;
- Promote and sell our Services to individuals via email, direct mail, phone, video calls, SMS, or other forms of communication platforms (e.g., WhatsApp);
- Send you gifts;
- Manage, improve, and personalize our Services, including identifying individuals and remembering their information when they return to our Services, and analyzing our customer base;
- Process payments for our Services;
- Conduct market research;
- Test, improve, update, and monitor the Services, or diagnose or fix technical issues;
- Assist in maintaining the security, safety, and integrity of our property and Services, technical assets, and business;
- Enforce our Terms of Service, resolve disputes, fulfill our obligations, exercise our rights, and protect our business interests as well as the interests and rights of third parties;
- Prevent, investigate, or report fraudulent, illegal, or criminal activities;
- Process and award entries and prizes for contests and sweepstakes;
- Comply with legal obligations.

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### 3. How We Share Personal Information

We may also share, transfer, disclose, grant access to, provide, and make available Personal Information to third parties as described below.

- **Service Providers:** We share Personal Information with third-party contractors and service providers, all of whom are subject to reasonable confidentiality obligations. These service providers may include payment processors, website hosting and maintenance service providers, technical support providers, email and instant messaging service providers, analytics service providers, data storage service providers, and website and video hosting service providers and developers. All such service providers are subject to confidentiality obligations and may only process data on our behalf and in accordance with our instructions, unless such service providers act as data controllers on their own behalf (e.g., when we seek advice from lawyers and tax consultants).
- **GAEA INC:** We may share your Personal Information with other companies and brands controlled by GAEA INC, as well as other companies that are part of the same company as GAEA or under the same ownership. These companies will use your Personal Information in the manner described in this Privacy Statement.
- **Business and Marketing Partners:** We may also disclose Personal Information to other business and marketing partners that co-provide products or services with us, conduct joint marketing or events, or are part of our partner ecosystem. Where required by applicable law, we may obtain your consent. Our business and marketing partners will use your information in accordance with their own privacy statements.
- **Advertising Partners:** To promote our Services to you, we may share certain Personal Information (including information collected through Cookies) with our advertising service providers and vendors.
- **Corporate Transactions:** If we sell or transfer all or part of our business or assets (including company shares), or transfer any part or combination of products, services, businesses, and/or assets, we may transfer any information we have collected. In the event of such a transaction (whether an asset sale, merger, acquisition, bankruptcy, dissolution, restructuring, liquidation, change of control, or similar transaction or proceeding), we will use reasonable efforts to ensure that any transferred information is processed in accordance with this Privacy Statement.
- **Legal Obligations and Rights:** If we have reason to believe it is necessary, we may disclose Personal Information to third parties (e.g., legal counsel and law enforcement agencies, regulatory authorities, other authorities, and other third parties)

for legal reasons:

- In connection with establishing, exercising, or defending legal rights;
  - To comply with law or respond to legal requests and legal processes;
  - To protect the rights and property of ourselves and others, including enforcing our agreements and policies;
  - To detect, prevent, or report fraud; or
  - As otherwise required by applicable law.
- **To All GAEA Community Users:** When you post content in the GAEA Community section of the website, please remember that our website allows you to connect and interact with other users. In such cases, your Personal Data may be visible to other users, as described in the "GAEA Community" section above.
  - **With Your Consent:** We may disclose your Personal Information to certain third parties or publicly disclose it with your consent or at your direction. For example, with your consent or direction, we may post your reviews on our website or service-related publications.
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## 4. Online Advertising

We may share (or allow these third parties to collect) Personal Information with online advertising networks, social media companies, and other third-party services, including information about your use of our Services over time, so that they can deliver or display advertisements that may be of interest to you on other websites, applications, or other devices you may use. Typically (but not always), the information we share is provided through Cookies or similar tracking technologies that can identify the device you are using and collect information, including hashed data, clickstream information, browser type, the time and date of your visit to the website, and other information. This information is used to display targeted advertisements on other websites, applications, or services. We or online advertising networks use this information to make the advertisements you see online more relevant to your interests. We may also display targeted advertisements to you through social media platforms such as LinkedIn, Facebook, Twitter, and Google. These companies have interest-based advertising programs that allow us to target advertisements to users who have shown interest in our Services on social media platforms, or to other user groups with similar characteristics (e.g., potential business interests and demographic characteristics). These advertisements are governed by



the privacy policies of the social media companies providing them.

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## 5. Controlling Your Information

- **Email Communications:** We may from time to time send you emails containing updates on Services, products, or services, notifications about our organization, or information about products/services we think you may be interested in. If you wish to unsubscribe from such emails, simply click the "Unsubscribe" link at the bottom of the email. Please note that you cannot unsubscribe from certain service-related emails (e.g., account verification, transaction confirmations, technical or legal notices).
  - **Instant Messaging Platforms:** We may use the collected Personal Information to contact you through instant messaging platforms (e.g., WhatsApp), including to market products or services to you, or to provide you with information and updates about products or services we think you may be interested in. Where required by applicable law, we may obtain your consent. You can unsubscribe from these messages at any time by replying "STOP".
  - **SMS Notifications:** We may use the collected Personal Information to contact you via SMS, including (with your consent) to promote products or services to you, or to provide you with information and updates about products or services we think you may be interested in. You can unsubscribe from marketing SMS at any time by replying "STOP" or clicking the unsubscribe link in the SMS (if available). For more information, please refer to our Terms of Service.
  - **Modifying Account Information:** If you have a GAEA Services account, you can modify certain information in your account (e.g., your contact information and avatar) through the "Contact Information" tab in the "Account" section of your GAEA account. Not all Personal Information is stored in a format that you can access or change. If you wish to access, correct, or delete Personal Information, you can send a message to us through the support portal in your GAEA account. We will review your request and may ask you to provide additional information to verify your identity, but we do not guarantee that we will be able to fulfill your request.
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## 6. Privacy Rights

Under applicable privacy laws and the laws of your jurisdiction, you may exercise some or all of the following rights with respect to the Personal Information we have collected about you (subject to certain limitations as required by law):

- **Right of Access and Portability:** You have the right to access the Personal Information we have collected about you and, where required by law, to obtain a copy of the Personal Information.
- **Right to Rectification:** You have the right to request that we correct inaccuracies in your Personal Information, taking into account the nature of the Personal Information and the purposes of processing the Personal Information.
- **Right to Erasure:** You have the right to request the deletion of your Personal Information, subject to certain exceptions.
- **Right to Opt-Out:** You have the right to opt out of certain data processing activities. For example, you have the right to opt out of the use of your Personal Information for targeted advertising purposes, or in certain cases, to opt out of the "sale" of your Personal Information to third parties. You also have the right to direct us not to use automated decision-making or profiling for certain purposes. Please note that depending on the nature and scope of your request, we may not be able to continue providing you with Services. In such cases, we will notify you and seek your confirmation before processing your request.
- **You have the right to control our collection and processing of certain sensitive Personal Information.**

Before processing your request, we need to verify your identity and confirm that you are a resident of a jurisdiction where such rights are available. To verify your identity, we will typically require you to successfully verify your account or match the information you provide with the information we have stored about you in our systems. This process may require you to provide additional Personal Information. In certain cases, we may deny your request to exercise the above rights, particularly if we cannot verify your identity or find your information in our systems. If we are unable to fulfill all or part of your request, we will explain the reasons for the denial.

To exercise your right to opt out, please submit your request in the following ways:

- To opt out of targeted advertising (i.e., to opt out of Cookies), please use our Cookie Management Tool: [Cookie Management Tool](#)
- To opt out of the "sale" of data, please fill out our Privacy Rights Request Form to submit your request.

Unless you have exercised your right to opt out, we may disclose or "sell" your Personal Information to third parties for monetary or other valuable consideration, or use your information for all purposes described in this Privacy Statement, including targeted advertising. Third parties to whom we sell or disclose Personal Information may use such information for their own purposes in accordance with their own privacy statements.

You do not need to create an account with us to exercise your right to opt out. However, we may require you to provide additional Personal Information to enable us to correctly identify you and track the implementation of your opt-out request. We will only use the Personal Information you provide in your opt-out request to review and process the request. If you choose not to provide this information, we may only be able to process your request to the extent that you can be identified in our data systems. If we reasonably believe that your request is fraudulent, we may not process your request. In such cases, we will send a notification to the requester explaining our decision.

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## **7. Children**

Our Services are not directed to children under the age of 16, and we do not intentionally or knowingly collect or solicit Personal Information from children under the age of 16. If you are under the age of 16, please do not use our Services or provide us with any Personal Information in any way (including directly or indirectly). If a child under the age of 16 has provided us with Personal Information, we encourage the child's parent or guardian to contact us to request that we delete the Personal Information from our systems. If we discover that any Personal Information we have collected was provided by a child under the age of 16, we will immediately delete that Personal Information.

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## **8. Third-Party Websites and Services**

The Services may contain integrations with or links to third-party websites or services, including those of our business partners. When you interact with these third parties, you are providing information directly to the third party, not to GAEA. Please note that GAEA is not responsible for the privacy practices of these third parties or any entities that we do not own or control. We recommend that you review the privacy statements and online terms of these third parties to understand how they process your Personal Information.

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## **9. Changes to This Privacy Statement**

We reserve the right to modify this Privacy Statement at any time in our sole discretion. For material changes to the way we process Personal Information, we will provide you with adequate notice through your account, by posting a prominent notice on our website, or through other appropriate communication channels. It is your responsibility to review this Privacy Statement periodically. Unless otherwise specified, all changes will take effect on the date of posting.

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## **10. Contact Us**

If you have any questions or requests regarding this Privacy Statement or other privacy-related matters, please send an email to [aigaea3@gmail.com](mailto:aigaea3@gmail.com).

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## **11. Regional Disclosures**

This Privacy Statement is intended to apply to visitors to our website, users of our Services, and other companies and users worldwide. Please refer to the following for additional disclosures that may apply to you:

## **Supplementary Information for Australian Residents**

These additional disclosures for Australian residents ("Australian Disclosures") supplement the information contained in our Privacy Statement and apply only to individuals in Australia ("you").

These Australian Disclosures provide additional information about how we collect, use, disclose, and otherwise process the Personal Information of Australian individuals, whether online or offline, in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles ("APPs") in Schedule 1 to the Privacy Act.

Unless otherwise expressly stated, all terms in these Australian Disclosures have the same meanings as defined in our Privacy Statement or as otherwise defined in the Privacy Act.

In this Australian Disclosure Notice, when we use the term "Personal Information", we refer to information or an opinion about an identified individual or a reasonably identifiable individual, whether the information or opinion is:

- True or false;
- Recorded in a material form or not.

### **A. How We Collect Your Personal Information**

Section 1 of our Privacy Statement describes the various ways we collect your Personal Information. We may also collect your Personal Information if any telephone or video calls are made between you and GAEA (with your permission).

### **B. Overseas Transfer of Personal Information**

Your Personal Information may be transferred to and stored in countries outside Australia, including countries where we and our third-party service providers conduct business, such as the United States and the United Kingdom where GAEA Inc. is

located.

If GAEA transfers Personal Information outside Australia, we will ensure that: (i) the Personal Information is transferred to a country that is recognized as providing an equivalent level of privacy protection to Australia; or (ii) the transfer is subject to appropriate safeguards, such as contractual obligations.

## **C. Storing Your Personal Information**

We take appropriate technical and organizational measures to protect your Personal Information from accidental or unlawful destruction, loss, alteration, or damage. All Personal Information we collect will be stored on secure servers by our cloud hosting service providers.

We will never send you unsolicited emails or contact you by phone to request credit or debit card information.

## **D. Your Privacy Rights**

Under the APPs, you have various rights.

### **Right of Access and Request**

You have the right to request access to and/or correction of your Personal Information held by GAEA. You can exercise these rights by contacting our Privacy Officer at [aigaea3@gmail.com](mailto:aigaea3@gmail.com).

We will respond to your request within a reasonable time. If your request is denied, we will inform you in writing of the reasons for the denial and the avenues available to you to lodge a complaint.

### **Right to Complain**

You also have the right to lodge a privacy complaint with our Privacy Officer at [aigaea3@gmail.com](mailto:aigaea3@gmail.com).

Our Privacy Officer will first review your complaint to determine if there are simple or immediate steps that can be taken to resolve it. Our Privacy Officer will make every effort to complete the investigation of your complaint as soon as possible. We may ask you to provide additional information about the complaint and your desired outcome. After that, our Privacy Officer will typically gather relevant facts, locate and review relevant documents, and communicate with relevant personnel.

In most cases, our Privacy Officer will investigate and respond to you in writing within 30 days of receiving your complaint. If the matter is more complex or the investigation may take longer, our Privacy Officer will inform you.

If you are dissatisfied with GAEA's response to your complaint, you can lodge a complaint with the Office of the Australian Information Commissioner ("OAIC"). You can contact the OAIC by calling 1300 363 992 or using the contact details on the website [[www.oaic.gov.au](http://www.oaic.gov.au)]([www.oaic.gov.au](http://www.oaic.gov.au)).

## **Supplementary Information for California Residents (U.S.)**

These additional disclosures for California residents ("California Disclosures") supplement the information contained in our Privacy Statement and apply only to individual residents of California ("Consumer" or "you").

These California Disclosures provide additional information about how we collect, use, disclose, and otherwise process the Personal Information of California residents, whether online or offline, in accordance with the California Consumer Privacy Act of 2018 (as amended by the California Privacy Rights Act) (collectively referred to as the "CCPA").

Unless otherwise expressly stated, all terms in these California Disclosures have the same meanings as defined in our Privacy Statement or as otherwise defined in the CCPA.

In this California Notice, we use the term "Personal Information" to refer to information that identifies, relates to, describes, is reasonably capable of being

associated with, or could reasonably be linked, directly or indirectly, with a particular Consumer or household.

## **A. Collection and Use of Personal Information**

We collect your Personal Information for various purposes, as detailed in the sections "How We Collect Your Personal Information" and "How We Use Your Personal Information" in the Privacy Statement.

Categories of Personal Information We Collect. In the past 12 months, we have collected the following categories of Personal Information:

- Identifiers, such as your name (including first name, middle name, and last name), email address, username, or other similar identifiers;
- CA Customer Records, such as your name, phone number, and postal address;
- Commercial information, such as records of services purchased, obtained, or considered;
- Internet/network information, such as device information, logs, and analytics data;
- Geolocation data, such as approximate location data generated from your IP address or other information;
- Sensory information, such as recordings of any telephone or video calls between you and GAEA (if applicable, with your consent);
- Professional/employment-related information, such as the business or organization you represent, your job title in that business or organization, and information related to your role in that business or organization, job application information, and other details contained in your resume;
- Inferences drawn from your use of our website regarding your interests and preferences; and
- Other Personal Information, including information you submit in feedback forms, any communications between you and GAEA, and information we receive from social networking sites.

We collect such information from the following sources: directly from you, from our business partners and affiliated companies, from your browser or device when you access our applications or use our Services, or from third parties with whom you have permitted us to share information. For more information about the sources of the Personal Information we collect, please refer to the section "How We Collect Your



Personal Information" in the Privacy Statement.

## **B. Disclosure of Personal Information**

We share Personal Information with third parties for business purposes. The categories of third parties to whom we disclose your Personal Information for business purposes include: (i) other brands and affiliated companies within our group; (ii) our service providers and consultants; (iii) analytics service providers; (iv) marketing and strategic partners; and (v) social networks.

In the past 12 months, we have disclosed all categories of Personal Information we have collected (as detailed in the "Collection and Use of Personal Information" section of these California Disclosures) to third parties for business purposes, in the specific manner described in the section "How We Share Your Personal Information" of the Privacy Statement.

## **C. Sale of Personal Information**

As further described in the section "How We Share Your Personal Information" in the Privacy Statement, we may "sell" or "share" your Personal Information (as defined by the CCPA) to third parties, but you have the right to opt out of these sales or sharing (see "Exercising Your Right to Opt Out" below).

In the past 12 months, we have sold or shared the following categories of Personal Information for the purposes described in the Privacy Statement, subject to your settings and preferences and your right to opt out: identifiers, such as your name and email address; CA Customer Records, such as your name and phone number; and commercial information, such as records of services purchased, obtained, or considered.

The categories of third parties to whom we may sell or share Personal Information include:

- Business and marketing partners
- Online advertising networks and analytics providers
- Social networks

We may also disclose Personal Information to third parties pursuant to your instructions or requests, in connection with corporate transactions, or to comply with legal or contractual obligations, as described in our Privacy Statement.

## D. Your California Privacy Rights

As a California resident, you may exercise the following rights with respect to the Personal Information we have collected about you (subject to certain limitations as required by law):

Right to Know/Access	After verifying your identity, you have the right to request access to all or part of the following information related to your Personal Information collected and disclosed by us in the past 12 months: • The specific Personal Information we have collected about you; • The categories of Personal Information we have collected about you; • The categories of sources of Personal Information; • The categories of Personal Information disclosed to third parties for business purposes, and the categories of recipients of such information; • The categories of Personal Information sold about you (if any), and the categories of third parties to whom such information was sold; and • The business or commercial purpose for collecting or (if applicable) selling the Personal Information.
Right to Request Deletion	You have the right to request that we delete the Personal Information we have collected about you, subject to certain exceptions.
Right to Correction	You have the right to request that we correct any inaccuracies in your Personal Information, taking into account the nature of the Personal Information and the purposes of processing your Personal Information.
Right to Opt Out of the Sale or Sharing of Personal Information	You have the right to direct us not to "sell" your Personal Information to third parties for monetary or other valuable consideration, or to "share" your Personal Information with third parties for cross-context behavioral advertising. If you are under 16 years of age, you have the right to opt in to such

	information sales, or have your parent or guardian opt in on your behalf.
Right to Restrict the Use and Disclosure of Personal Information	You have the right to direct us to restrict the use of your sensitive Personal Information for certain specific purposes, subject to certain exceptions.
Right to Control Automated Decision-Making/Profiling	You have the right to direct us not to use automated decision-making or profiling for certain specific purposes.
Right Against Retaliation	You have the right not to be retaliated against or discriminated against for exercising these rights. However, please note that if exercising these rights limits our ability to process Personal Information (e.g., in the case of a deletion request), we may no longer be able to provide you with products and services or interact with you in the same way.
"Shine the Light"	Under California's "Shine the Light" law, California residents who have established a business relationship with us have the right to know how their information is disclosed to third parties for their direct marketing purposes, or to opt out of such practices (Civil Code Section 1798.83).

## E. How to Exercise Your California Privacy Rights

### Exercising Your Right to Access, Know, Correct, and Delete

To exercise your right to access, know, correct, or delete, please fill out our Application Form to submit your request. Privacy Rights Request.

Before processing your request, we need to verify your identity and confirm that you are a California resident. To verify your identity, we will typically require you to successfully log in to your account or match the information you provide with the information we have stored about you in our systems. This process may require you to provide additional Personal Information, including but not limited to your email address, phone number, and/or the date you last used our Services.

In certain cases, we may deny your request to exercise the above rights, particularly if we cannot verify your identity or find your information in our systems. If we are unable to fulfill all or part of your request, we will explain the reasons for the denial.

## **Exercising Your Right to Opt Out of the Sale or Sharing of Personal Information for Targeted Advertising**

Unless you have exercised your right to opt out, we may disclose or "sell" your Personal Information to third parties for monetary or other valuable consideration, or "share" your Personal Information with third parties for cross-context behavioral advertising purposes. Third parties to whom we sell or share Personal Information may use such information for their own purposes in accordance with their own privacy policies.

You do not need to create an account with us to exercise your right to opt out. However, we may require you to provide additional Personal Information to enable us to correctly identify you and track the implementation of your opt-out request. We will only use the Personal Information you provide in your opt-out request to review and process the request. If you choose not to provide this information, we may only be able to process your request to the extent that you can be identified in our data systems.

To exercise your right to opt out of the "sale" of Personal Information, you can submit your request by clicking the following link: [Do Not Sell My Personal Information](#)

In addition, as is common with online operating companies, we allow third-party advertising networks, social media companies, and other third-party businesses to collect and disclose your Personal Information (including preferences, geolocation, commercial information, and internet, network, and device information) directly from your browser or device when you access or use our website, use our applications, or otherwise interact with us through Cookies or tracking technologies. These third parties use this information to deliver more relevant advertisements, measure and analyze advertising campaign effectiveness, and conduct fraud detection and reporting, and may sell or share this information with other businesses for advertising and other purposes. To learn more about how third parties collect information through tracking technologies and other relevant choices you may have, please refer to our [Cookie Notice](#).

To exercise your right to opt out of the use of your Personal Information for cross-context behavioral advertising (targeted advertising), you can submit your request by clicking the following link to add you to our block list: [Cookie Settings](#)

## **Authorized Agents**

In certain circumstances, you may authorize an agent to submit a request to exercise your California privacy rights on your behalf. The agent must provide a signed letter from you confirming that they have been authorized to submit the request on your behalf; or the agent must provide sufficient evidence that they have been legally granted power of attorney.

For security purposes, we may need to verify your identity and confirm directly with you whether you have authorized the agent to submit the request. Processing a request submitted by an agent may take additional time. If we cannot verify the agent's authority to act on your behalf, we may deny the request. Please note that for privacy and security reasons, all future communications will be sent directly to the data subject on whose behalf the request was made.

## **"Shine the Light" Disclosure**

California's "Shine the Light" law gives California residents the right to request information from us in certain circumstances about how we share certain categories of Personal Information (as defined by the "Shine the Light" law) with third parties for their direct marketing purposes. To opt out of such information sharing, please fill out our form to submit your request. [Privacy Rights Request](#).

## **Notice of Financial Incentives**

In addition, pursuant to the CCPA, we may offer financial incentives for the collection, sale, retention, and use of your Personal Information, which may result in reasonable differences in prices, rates, or quality levels, but are not limited to such. The specific terms of any financial incentive will be explained and described in the program terms. Please note that participation in the incentive program is completely voluntary, you must actively opt in to the program, and you can opt out at any time (i.e., terminate participation and forfeit ongoing incentives) in accordance with the instructions in the relevant program description and terms. We may add or change incentive programs

and/or their terms by posting a notice in the program description and terms at the above link, so please review them periodically.

Each financial incentive, price, or service difference related to the collection and use of Personal Information is based on our reasonable and good-faith assessment of the estimated value of that information to our business, taking into account the value of the offer itself and the expected revenue that may be achieved by rewarding brand loyalty. We use the costs associated with the offer to calculate the value of the offer and financial incentive.

## **Minors**

We do not sell Personal Information, nor are we aware that we sell the Personal Information of minors under the age of 16. If you or your minor child is under the age of 16, please contact us at [aigaea3@gmail.com](mailto:aigaea3@gmail.com) to inform us.

If you are under the age of 18 and wish to have your name or comments removed from our website or publicly displayed content, please contact us directly at [aigaea3@gmail.com](mailto:aigaea3@gmail.com). In certain cases, we may not be able to modify or delete your information.

## **Supplementary Information for Nevada Residents (U.S.)**

If you are a resident of the State of Nevada, USA, pursuant to Chapter 603A of the Nevada Revised Statutes, Nevada residents may opt out of having website operators sell certain protected information they have collected or will collect. To opt out of such information sales, please fill out our Privacy Rights Application Form to submit your application.

## **Supplementary Disclosures for the European Economic Area, the United Kingdom, and Switzerland**

GAEA operates in Europe and may provide Services to individuals located in the European Economic Area, the United Kingdom, and Switzerland. In such cases, the following additional disclosures apply to our processing of Personal Data.

The term "Personal Data" as used in this section refers to information relating to an identified or identifiable natural person.

## Controller

GAEA Inc. is the controller of your Personal Data. GAEA is responsible for processing your Personal Data for the following reasons: to perform our contractual Services, as described below.

### A. Legal Basis for Processing

We use your Personal Data based on the following legal bases, which are (EU) Regulation 2016/679 ("EU GDPR") or, where applicable, the "UK GDPR" (which forms part of the law of England and Wales, Scotland, and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018).

### B. How Long We Will Keep Your Personal Data

We will generally not store the Personal Data we have collected about you for longer than is necessary for the purposes described above and will comply with our legal obligations and legitimate business interests.

The criteria used to determine the retention period of your Personal Data depend on the legal basis for our processing of the Personal Data:

- **Contract:** If we process Personal Data based on a contract, we will generally retain your Personal Data for the duration of the contract and for a limited period thereafter as necessary to comply with law or to address potential legal claims that may arise from our contractual relationship.
- **Legitimate Interests:** When we process Personal Data based on legitimate interests, we will generally retain such information for a reasonable period based on the specific interest, taking into account your fundamental rights, rights, and freedoms.
- **Consent:** If we process Personal Data based on your consent, we will generally

retain your Personal Data until you withdraw your consent or until such time as is necessary to perform the relevant agreement with you or to provide the applicable Services for which we process the Personal Data.

- **Legal Obligation:** If we process Personal Data based on a legal obligation, we will generally retain your Personal Data for the period necessary to fulfill that legal obligation.
- **Legal Claims:** When we are threatened with a legal claim or intend to bring a claim, we may need to take "legal hold" measures to extend the retention period of information beyond the usual retention period. In such cases, we will retain the information until the legal hold is lifted, which typically means the claim or threat of claim has been resolved.

In all cases, in addition to the purpose and legal basis, we will also consider the quantity, nature, and sensitivity of the Personal Data, as well as the risk of harm that could result from the unauthorized use or disclosure of your Personal Data.

## **C. Marketing and Advertising**

We may from time to time contact you to provide you with information about our Services, including sending marketing communications and seeking your feedback on our Services. Most of the marketing communications we send will be via email or instant messaging platforms. For certain marketing communications, we may use the Personal Data we have collected about you to help us determine the most relevant marketing information to share with you.

We may send you marketing communications if you have consented to receive them, or if we have followed the "soft opt-in" rule (where applicable). If you wish to unsubscribe from such communications, please refer to the detailed instructions in the "Controlling Your Information" section above.

## **D. Storage and Transfer of Personal Data**

**Security Safeguards.** We take appropriate technical and organizational measures to protect your Personal Data from accidental or unlawful destruction, loss, alteration, or damage. All Personal Data we collect will be stored on secure servers by our cloud hosting service providers. We will never send you unsolicited emails or contact you by phone to request credit or debit card information.



Your Personal Data may be transferred to and stored in countries outside the European Economic Area, the United Kingdom, and Switzerland, including countries where we and our third-party service providers conduct business, such as the United States where GAEA Inc. is located.

If GAEA transfers data, we will ensure that: (i) the Personal Data is transferred to a country recognized as providing an adequate level of protection; or (ii) the data transfer is subject to appropriate safeguards, such as Standard Contractual Clauses adopted by the European Commission.

If you would like to learn more about these security measures, please contact us using the details provided in the "Contact Us" section of the Privacy Statement.

## **E. Your Rights in Relation to Personal Data**

Under applicable privacy laws, you have the following rights with respect to the Personal Data we hold about you:

- **Right to Erasure:** You have the right to request the deletion of the Personal Information we have collected about you, subject to certain exceptions.
- **Right of Access:** You have the right to obtain certain information about our processing of your Personal Data, including:
  - Confirmation of whether and where we are processing your Personal Data;
  - Information about the categories of Personal Data we are processing, the purposes for which we process your Personal Data, and how we determine the applicable retention period;
  - Information about the categories of recipients with whom we may share your Personal Data; and
  - A copy of the Personal Data we hold about you.
- **Right to Data Portability:** In certain cases, you have the right to receive a copy of the Personal Data you have provided to us in a structured, commonly used, machine-readable format for reuse, or to request that your Personal Data be transferred to another person.
- **Right to Rectification:** You have the right to request that we immediately correct any inaccurate or incomplete Personal Data we hold about you.

- **Right to Erasure:** In certain cases, you have the right to request that we immediately delete your Personal Data, for example, if there is no legitimate reason for continuing to process the Personal Data.
- **Right to Restriction of Processing:** In certain cases, you have the right to request that we restrict the purposes for which we process your Personal Data, for example, when you dispute the accuracy of the Personal Data.
- **Right to Withdraw Consent:** In certain cases, we need your consent to process your Personal Data. In such cases, if you have provided consent, you have the right to withdraw your consent at any time. The withdrawal of your consent will not affect the lawfulness of our use of your Personal Data prior to the withdrawal of your consent.
- **You also have the right to object to any data processing we conduct based on legitimate interests. We may have compelling legitimate reasons for continuing to process your Personal Data, and if so, we will assess and inform you. You may object to our marketing activities at any time for any reason.**

You also have the right to lodge a complaint with the local data protection authority. If you are located in:

- The United Kingdom, your local data protection authority is the Information Commissioner's Office (<https://ico.org.uk/global/contact-us/>).
- Switzerland, your local data protection authority is the Swiss Federal Data Protection and Information Commissioner (<https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/contact/address.html>).
- Ireland, your local data protection authority is the Data Protection Commission (<https://www.dataprotection.ie/en/contact/how-contact-us>).

If you wish to exercise any of these rights, please fill out our Application Form to submit your application. Privacy Rights Application Form.

Due to the confidentiality of data processing, when you exercise the above rights, we may require you to provide proof of identity to verify your identity.

## Supplementary Information for Singaporean Residents

These additional disclosures for Singaporean residents ("Singapore Disclosures") supplement the information contained in our Privacy Statement and apply to the

processing of Personal Data collected by GAEA from Singapore.

These Singapore Disclosures provide additional information about how we collect, use, disclose, and otherwise process the Personal Data of Singaporean individuals in accordance with the Personal Data Protection Act 2012 (Singapore) ("PDPA").

Unless otherwise expressly stated, all terms in these Singapore Disclosures have the same meanings as defined in the Privacy Statement or as defined in the PDPA.

In this Singapore Disclosure Notice, when we use the term "Personal Data", we refer to data about an identifiable individual, whether true or false, by which that individual can be identified: (a) by that data alone; or (b) by that data and other information that the organization has or is likely to obtain.

## **A. Cross-Border Transfer of Your Personal Data**

Pursuant to this Privacy Statement, your Personal Data may be transferred to and from Singapore (including but not limited to the United States) for storage and/or processing.

If GAEA transfers your Personal Data outside Singapore, we will take appropriate measures in accordance with applicable law to ensure that the transferred Personal Data receives a standard of protection equivalent to that under the PDPA.

## **B. Retention of Personal Data**

We may retain your Personal Data for as long as is necessary to fulfill the purposes for which it was collected, or as required or permitted by applicable law.

Once it is determined that continuing to retain your Personal Data no longer serves the purpose for which it was collected and is no longer required for legal or business purposes, we will cease retaining your Personal Data or delete the means by which the data can be associated with you.

## C. Protection of Personal Data

We will take reasonable security measures to ensure that your Personal Data is adequately protected and secured. We will implement appropriate security measures to prevent any unauthorized access, collection, use, disclosure, copying, modification, disclosure, loss, damage, and/or tampering of your Personal Data. However, we are not responsible for the unauthorized use of your Personal Data by third parties resulting from factors beyond our control.

## D. Your Rights Under the PDPA

If you use the Services in Singapore, under the PDPA, you have the following rights, subject to certain limitations/exceptions as provided for in the Act:

Right of Access	You have the right to access the Personal Data about you that GAEA holds or controls, as well as information about how GAEA has used or disclosed such data in the year prior to the date of your request.
Right to Correction	You have the right to request that GAEA correct any errors or omissions in your Personal Data that GAEA holds or controls.
Right to Withdraw Consent	You have the right to withdraw any consent you have previously given or are deemed to have given to GAEA for the collection, use, or disclosure of your Personal Data for any purpose.  We respect your decision to withdraw consent, but please note that if you withdraw consent for the use of your Personal Data, you may not be able to use the relevant Services. In such cases, we will notify you before completing the processing of your request.  Please note that the withdrawal of consent does not affect our right to continue collecting, using, disclosing, or processing your Personal Data where permitted or required by applicable law.

If you wish to exercise any of these rights, please fill out our Privacy Rights Request Form to submit your request.

## **E. Data Protection Officer**

If you have any complaints, questions, requests, or clarifications regarding how we process your Personal Data or how we comply with the PDPA, please contact our Data Protection Officer at [aigaea3@gmail.com](mailto:aigaea3@gmail.com).

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## **12. EU-U.S. Data Privacy Framework, UK Extension to the EU-U.S. Data Privacy Framework, and Swiss-U.S. Data Privacy Framework Principles**

GAEA complies with the EU-U.S. Data Privacy Framework ("EU-U.S. DPF"), the UK Extension to the EU-U.S. Data Privacy Framework, and the Swiss-U.S. Data Privacy Framework ("Swiss-U.S. DPF") as set forth by the U.S. Department of Commerce. GAEA has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles ("EU-U.S. DPF Principles") with respect to the processing of Personal Information received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. GAEA has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles ("Swiss-U.S. DPF Principles") with respect to the processing of Personal Information received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this Privacy Policy and the EU-U.S. DPF Principles and/or Swiss-U.S. DPF Principles, the Principles shall prevail. To learn more about the Data Privacy Framework ("DPF") program and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

The U.S. Federal Trade Commission has jurisdiction over GAEA's compliance with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. Data Privacy Framework, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF).

In the event of a subsequent transfer of Personal Information to a third-party agent acting on its behalf, GAEA is responsible for the processing of the Personal Information by the third-party agent in accordance with the EU-U.S. Data Protection Framework (EU-U.S. DPF). If the agent processes such Personal Information in a

manner inconsistent with the Principles, GAEA shall remain liable under the Principles unless GAEA proves that it is not responsible for the event giving rise to the damage.

Pursuant to the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF Principles, GAEA commits to resolving complaints about privacy and the collection or use of your Personal Information transferred to the United States pursuant to the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF Principles. Individuals in the European Union, the United Kingdom, and Switzerland with inquiries or complaints regarding this privacy policy should first contact GAEA at: [aigaea3@gmail.com](mailto:aigaea3@gmail.com).

GAEA has further committed to referring unresolved privacy complaints under the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF Principles to an independent dispute resolution mechanism operated by BBB National Programs—the Data Privacy Framework Service.

If your DPF complaint cannot be resolved through the above channels, you may, in certain circumstances, pursue binding arbitration before the Data Privacy Framework Panel.

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## 13. Contact Us

If you have any questions or concerns about how GAEA uses your Personal Data, you can contact us:

- By sending an email directly to [aigaea3@gmail.com](mailto:aigaea3@gmail.com).
- Through our designated EU representative—European Data Protection Office ("EDPO").
  - On their online web form:
    - Ireland (EU GDPR): <https://edpo.com/gdpr-data-request/>
    - UK GDPR: <https://edpo.com/uk-gdpr-data-request/>
    - Swiss Federal Data Protection (FADP): <https://edpo.com/swiss-data->

[request/](#)

- By mail to the following applicable address:
  - Ireland (EU): EDPO, Ground Floor, 71 Baggot Street Lower, Dublin D02 P593, Ireland
  - United Kingdom: EDPO UK, 8 Northumberland Avenue, London WC2N 5BY, United Kingdom; EDPO Switzerland, 37 Rue de Lausanne, 1201 Geneva, Switzerland