

PRIVACY AND COOKIES POLICY

This is the Privacy & Cookies Policy (the “**Policy**”) of Carter Labs Ltd, a company registered in England and Wales with registration number 14227823, with a registered office address at 20-22 Wenlock Road, London, NI 7GU (hereafter “**Carter**”, “**we**” or “**us**”). This Policy describes the ways in which Carter collects and uses information about you when you use its service (the “**Service**”) made available to you via carterlabs.ai or such other domain as Carter may make the Service available from, from time to time (the “**Platform**”).

Carter may change this Policy at any time and whilst it will tell you about what it feels are key changes to the Policy, please check it regularly to keep up-to-date. If you do not wish to accept the new Policy you should stop using the Service. If you continue to use the Service after the changes, your continued use of the Service shows us your agreement to be bound by the new Policy.

This Policy was last changed in May 2023.

- ICO registration and EU Representative:** For the purposes of data protection legislation, Carter has registered with the Information Commissioner’s Office (“**ICO**”). Its registration number is ZB526939. If you are based outside the UK but in the EEA, then please note that Carter’s EU representative is Rune Pettersen, Coolharbour Roundwood Co., Wicklow, A98 FY68, Ireland. Email address: eurep@fifthsquare.eu
- Information we use about you:** We collect and process the following information from you via the Platform:

What information do we collect?	When do we collect this?	How do we use this information?	Our reasons	
<ul style="list-style-type: none">• First name• Last name• Email address• Address• If you are an individual user, your date of birth• Billing information• Any other information submitted by you in connection with your account (for example (if you are a corporate client) user numbers,	If you choose to sign up and use the Service.	To create your account and allow you to access and use the Service thereafter.	Contractual necessity.	We require these details to create and administer the account in question, namely we require your name in order to send personalised system notifications, identify you at sign-in and for account administration purposes and we require your email

usage requirements and so on)				address, address and billing information to verify your identity as a unique account identifier and charge you our respective fees, together with other account administration activities. The other information that we require from you is required in order to perform our Service e.g., to determine the level of fees to charge you. Finally, if you are an individual user we require your date of birth in order to confirm that you meet the relevant age requirements to use our Service in your jurisdiction.
<ul style="list-style-type: none"> • First name • Last name • Email address 	If you choose to subscribe to marketing emails from Carter either by ticking the box as part of the account sign-up process or by choosing to subscribe to	To send you emails about our upcoming activities such as our future Service releases, partnerships and case studies of our customers, as well as other news and	Consent.	We only send you marketing emails where you have consented to receive them, or if we are otherwise permitted to send them to you by law (e.g., by virtue of the soft opt-in) , and you can unsubscribe at any time by clicking the

	such marketing emails on the Platform.	features relating to Carter. If you separately consent, we may also use these emails to inform you about clients of ours who are using our Service within one or more of their games.		unsubscribe button in any marketing message sent to you.
<ul style="list-style-type: none"> • First name • Last name • Email address • Other details collected as part of the running of any such promotion/competition 	If you choose to enter a promotion or competition of ours.	To allow you to participate in such promotion or competition.	Consent.	We only collect this information if you choose to enter such promotion or competition of your own volition.
The information collected via those cookies/technologies which are not necessary cookies, as set out in paragraph 8 below.	If you choose to allow these cookies (other than necessary cookies) to be placed then Carter will place those cookies and therefore collect the information provided via them accordingly.	To assess visitor numbers to our Platform and how users interact with our Platform and the Service, as well as for other maintenance and support purposes.	Consent.	We only place non-necessary cookies if you consent to these when first visiting our Platform.

We collect and process the following information if you are an end user of our Service e.g., a player which is using Carter in a game or an end user using our Service for your own consumer purposes:

What information do we collect?	When do we collect this?	How do we use this information?	Our reasons
Any and all data that you input into the Service whilst using the Service including any and all conversational information collected in connection with your interactions with our Service.	If you choose to input any data when using the Service.	To enable our Service to operate and run.	<p>N/A – we are a data processor in connection with this data. Please see the privacy policy of the entity whose product and/or service you are using Carter within to confirm the processing ground on which that entity is relying on (including, in the case of any Plugin, that Plugin provider) or, if you are an individual consumer using our service then bear in mind that you are deciding the purposes for which you wish to use Carter.</p> <p>Whilst we will then aggregate the information collected from you in our role as data processor, and use that aggregated and anonymised information to further refine and train our Service, such information is not personal data.</p>

3. **Plugins:** Carter has enabled developers (whether individual developers or entities) to create various plugins that can interact with, and use, its Service (each a “**Plugin**”). For example, a Plugin might use Carter to give you the latest weather updates in your location or to summarise important emails for you each morning. Whilst Carter is looking to move towards a system of verification for certain Plugins, at the moment no Plugin has been verified by Carter. Each Plugin is an independent data controller of the data that it chooses to handle and process and uses Carter as a data processor as outlined in the table at paragraph 2 above. Carter is not responsible for the privacy policies and practices of any Plugin provider even if you access them via the Service. You should check the policy of each Plugin that you use and contact its owner or operator if you have any concerns or questions.

4. **Sharing your information with third parties:** Some of the information Carter collects from you is passed to third parties. These third parties are:

- (a) our infrastructure and storage hosting provider – MongoDB;
- (b) our transactional email provider and CRM system - Hubspot;

- (c) our behaviour analytics provider - Google;
- (d) our user analytics provider - Facebook;
- (e) certain third party analytics and cookies providers as described further in paragraph 8 below;
- (f) in the future, any group companies of ours;
- (g) our regulator (the ICO);
- (h) in anonymised form, Carter may share the information with:
 - i. any third party, in relation to the sale of some or all of Carter's business, or its assets, or as part of any business restructuring or reorganisation. Carter will take steps with the aim of ensuring that your rights continue to be protected if your personal data is transferred under these circumstances;
 - ii. data aggregators and platform providers as part of an analysis of user metrics or sales performance; or
 - iii. law enforcement agencies in compliance with law enforcement.

5. **Links to third party websites:** Carter is not responsible for the privacy policies and practices of other sites even if you access them via the Service. You should check the policy of each site you visit and contact its owner or operator if you have any concerns or questions.

6. **Security:** Carter has implemented technology and policies to safeguard your privacy from unauthorised access and improper use.

7. **Storage and Data Retention:** We store your personal data in the UK. Where we permit any third party to transfer personal data outside the UK and/or EEA we ensure that we have an appropriate adequacy ground to do so e.g., SCCs. We retain your data for no longer than is reasonable in line with the purposes for which it was originally collected, although please note that we shall be entitled to anonymise any information collected hereunder and retain such anonymised data indefinitely in order to refine and improve the Service.

8. **Cookies:**

(a) **What are Cookies?** Cookies are small text files that are placed on your device when you use the Platform. Carter's use of cookies is detailed below. *Session cookies* enable you to move from page to page within the Platform and/or any information you enter will be remembered but is deleted when you close the page on the Platform or after a short time. *Persistent cookies* allow us to remember your preferences and settings when you use the Platform and Service in the future.

(b) **Disabling Cookies:** The use of the cookies described above improves the functionality of the Platform and the Service and your experience of using them. If you do not want these cookies to be served on your device, you are able to disable them by changing the settings on the Platform or on your device. Please note that if you do decide to disable cookies you may not be able to access the Platform and/or the Service, and some of the features of the Service may not function properly.

- (c) **Third Party Cookies:** Third Party advertisers may place or read cookies on your browser or device when you use the Platforms. This Policy is applicable only to the use of cookies by Carter and does not cover the use of cookies by any third parties.
- (d) **More information:** To find out more about how cookies work, how to manage and delete them and to see which ones have been set please visit www.aboutcookies.org or www.allaboutcookies.org.

Carter uses cookies and similar technologies in the following ways when you use the Platform:

Strictly Necessary Cookies

Cookie Name	Default Description
Auth0	To authenticate users on the Platform.

Other Cookies

Cookie Name	Default Description
Google Analytics	To track user behaviour.
Facebook	To track user demographics.
Hotjar	To track user experience navigating the Platform and our Service.

9. **Exercising your rights:** You can contact us using the details set out in paragraph 10 below if you wish to:
- (i) access a copy of the personal data that we hold about you; (ii) correct any items of personal data that we hold about you; and/or (iii) have any items of personal data that we hold about you erased or object to our processing of such items of personal data. Please note that these rights only relate to your personal data and, as noted above, we shall be entitled to anonymise any information collected hereunder and retain such anonymised data indefinitely in order to refine and improve the Service to which these rights do not apply.
10. **Carter Details:** If at any time you would like to contact Carter about your views on this Policy or any enquiry relating to your personal information, you can do so by sending an e-mail to us at privacy@carterapi.com or write to us at Data Protection Query, Carter Labs Limited, 34-35 Clarges Street Mayfair, London, England, W1J 7EJ. You also have the right to make a complaint to the ICO by contacting [them](#) at any time.