

ATLAS INVEST PRIVACY POLICY

Last Updated: April 24, 2024

In order to ensure transparency and give you more control over your personal information, this privacy policy (“**Privacy Policy**”) governs how we, Atlas Invest Big Data Ltd (“**Atlas**”, “**we**”, “**our**” or “**us**”) use, collect and store personal information that we collect or receive from or about you (“**you**”) in connection with www.atlas-invest.co (the “**Website**”) and the services provided therein (the “**Services**”).

We greatly respect your privacy, which is why we make every effort to provide a platform that would live up to the highest user privacy standards. Please read this Privacy Policy carefully, so you can fully understand our practices in relation to personal data. **Important note:** Nothing in this Privacy Policy is intended to limit in any way your statutory rights, including your rights to a remedy or other means of enforcement.

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This Privacy Policy can be updated from time to time and, therefore, we ask you to check back periodically for the latest version of this Privacy Policy. If we implement material changes in the way we use your personal information, in a manner that is different from that stated at the time of collection, we will notify you by posting a notice on our Website or by other means and take any additional steps as required by applicable law.

1. WHAT PERSONAL INFORMATION WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED

(i) We Process the Following Personal Information:

- a. **Personal Information provided through the Website.** When you use the Website we collect your full name, email address, phone number, your message, and any other information that you provide us with (including in your messages).
- b. **Personal Information automatically collected.** We automatically collect certain information through your use of our Services and Website, such as cookies and similar identifiers (“**Technologies**”), your Internet protocol (IP) address, and other device identifiers that are automatically assigned to your device, browser type and language, geo-location information, hardware type, operating system, internet service provider and other information about actions taken through the use of the Services and Website.
- c. **Personal Information provided through third-party authentication provider.** Atlas may obtain information from third-party authentication providers (“**Third Parties**”). Such Third Parties are mentioned in Section 7 of this Privacy Policy and the information collected through them is subject to such Third Party’s privacy policies.

(ii) We process information for the following purposes:

- a. **To allow you to make use of our Website.** We will use your personal information to allow you to make use of our Website, including, (i) to answer your questions and to allow you to communicate with us (e.g., by sending us a message through the Website forms); (ii) to analyze your use of our Website and to improve our Website; and (iii) to customize your experience.
- b. **For Administrative Purposes.** Atlas uses your personal information (i) to respond to your questions, comments, and other requests for customer support, or information, including information about potential or future services; (ii) to provide you with the Atlas Services; (iii) for internal quality control purposes; (iv) to establish a business relationship; (v) to generally administer the Atlas Services.
- c. **To Market our Website and Services.** We use personal information to market the Atlas Services. Such marketing practices includes (i) notifying you about offers and services that may be of interest to you; (ii) conducting market research; (iii) developing and marketing new products and services, (iv) to measure interest in Atlas’s Services; (v) other purposes disclosed at the time you provide information; and (vi) as you otherwise consent.
- d. **Security purposes.** Some of the abovementioned information will be used for detecting, taking steps to prevent and prosecuting fraud or other illegal activity; to identify and repair errors; to conduct audits; and for security purposes. Personal Information may also be used to comply with applicable laws, with investigations performed by the relevant authorities, law enforcement purposes, and/or to exercise or defend legal claims.
- e. **De-identified and Aggregated Information Use.** In certain cases, we may or will anonymize or de-identify your Information and further use it for internal and external purposes, including, without limitation, to analyze and improve our Services (including through the use of artificial intelligence) and for research purposes. We will use this anonymous or de-identified information and/or disclose it to third parties without restrictions (for example, in order to improve our services and enhance your experience with them and/or to develop new product features and improve existing offerings).
- f. **Cookies and Similar Technologies.** We use Technologies to automatically collect information through the Website and Services. We use Technologies that are essentially small data files placed on your device that allow us to record certain pieces of information whenever you visit or interact with the Website and Services. If you would like to opt out of the cookies and similar technologies we employ on the Website and Services, you may do so by blocking, deleting, or disabling them as your browser or device permits.

2. HOW WE PROTECT AND RETAIN YOUR PERSONAL INFORMATION

- 2.1. **Security.** We have implemented and maintain reasonable technical, organizational and security measures designed to protect your personal information. However, please note that we cannot guarantee that the information will not be compromised as a result of unauthorized penetration to our servers. As the security of information depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.
- 2.2. **Retention of your personal information.** Your information will be stored until we delete our records, and we proactively delete it, or if you send a valid deletion request. Please note that in some circumstances we store your information for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, and/or (iii) if we reasonably believe there is a prospect of litigation relating to your information or dealings.

3. HOW WE SHARE YOUR PERSONAL INFORMATION

We share your personal information as follows:

- 3.1. The personal information Atlas gathers is shared with our partners and other third parties, including without limitation, data generation companies.
- 3.2. We also share personal information with our affiliated companies about you.
- 3.3. We use third party service providers to process your personal information for the purposes outlined above, including, without limitation:
 - 3.3.1. With cloud service providers for hosting purposes;
 - 3.3.2. With websites and web content creation platforms in order to help us manage our Website;
 - 3.3.3. With email providers, marketing, CRM, other similar tool providers; and
 - 3.3.4. With analytic companies, in order to help us understand and analyze personal information we collect in accordance with this policy.
- 3.4. To the extent necessary, with regulators, courts, banks or competent authorities, to comply with applicable laws, regulations and rules (including, without limitation, federal, state or local laws), and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order, as well as for internal compliance procedures and to protect the safety, security, and integrity of Atlas, our Services, customers, employees, property, and the public.

- 3.5. If, in the future, we sell or transfer, or we consider selling or transferring, some or all of our business, shares or assets to a third party, we will disclose your information to such third party (whether actual or potential) in connection with the foregoing events (including, without limitation, our current or potential investors). In the event that we are acquired by, or merged with, a third-party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer, disclose or assign your personal information in connection with the foregoing events.
- 3.6. Where you have otherwise provided your consent to us for sharing or transferring your personal information.

4. YOUR PRIVACY RIGHTS

- 4.1. **Exercise of privacy rights:** You can exercise your privacy rights by contacting us at info@atlas-invest.co. You may use an authorized agent to submit a request on your behalf if you provide the authorized agent written permission signed by you. To protect your privacy, we may take steps to verify your identity before fulfilling your request. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly in accordance with applicable law or inform you if we require further information in order to fulfil your request. When processing your request, we may ask you for additional information to confirm or verify your identity and for security purposes, before processing and/or honoring your request. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive. In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initially requested, we will address your request to the maximum extent possible, all in accordance with applicable law.
- 4.2. **Deleting your account:** Should you ever decide to delete your account, you may do so by emailing info@atlas-invest.co. If you terminate your account, any association between your account and personal data we store will no longer be accessible through your account. However, given the nature of sharing on certain services, any public activity on your account prior to deletion will remain stored on our servers and will remain accessible to the public.
- 4.3. **Marketing emails – opt-out:** You may choose not to receive marketing email of this type by sending a single email with the subject "BLOCK" to info@atlas-invest.co. Please note that the email must come from the email account you wish to block **OR** 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, and we will process your request within a reasonable time after receipt.

5. **INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION.** In order to run our business and provide our Website and Services to you, we transfer personal data to certain countries around the world, including to our affiliates and service providers, many of whom are located outside of your jurisdiction. Therefore, your personal data may be processed in countries with privacy laws that are different from privacy laws in your country.

6. **USE BY CHILDREN.** We do not offer our Services for use by children and, therefore, we do not knowingly collect personal information from, and/or about children under the age of 18. If you are under the age of 18, do not provide any personal information to us. In the event that we become aware that you provide personal information in violation of applicable privacy laws, we reserve the right to delete it. If you believe that we might have any such personal information, please contact us at privacy@atlas-invest.co.

7. ANALYTIC TOOLS

- We collect personal information about your use of the Services and Website through Technologies to review or improve the usage and operations of our Website, to analyze trends and track users' movement around the Website, to administer the Website and to provide you with advertising about products and services tailored to your individual interests.
- We reserve the right to remove or add new analytic tools, cookies, pixels and other tracking technologies.

8. **CONTACT US.** If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us at Atlas Invest Big Data Inc. with office located in 12 E 49th Street, 12th floor, New York, NY 10017 USA.