ACE - PRIVACY POLICY

SUMMARY

PII We Collect. In order to provide and improve Ace, we may collect information you provide, usage information and other information as detailed below.

How We Use Your PII. We use your PII in order to provide you with services and to maintain, provide and improve Ace, to understand the usage trends and preferences of our users, to present ads or sponsored content and in order to protect Ace from threats.

Artificial Intelligence ("AI"). AI tools are an integral part of Ace. We offer users various AI tools on Ace, including generative AI and we also use AI in order to assist us in improving Ace and personalizing Ace, allowing for more coherent and meaningful AI chat exchanges. Your conversations with AI are NOT shared with advertisers, but can be processed by us internally to personalize your chat experience, including by presenting sponsored content.

Google User Data. If you connect a Google account (Drive, Gmail, Calendar, Contacts, Docs, Sheets and Slides), we use the Google data you authorize only to complete your requests, never for ads, sponsored content, profiling or training AI models. For more details see Section 5 below.

Cookies and Web Beacons. We may use web beacons, tags and scripts for collecting PII and attributing it to a persistent user (which user is not identified to us, if they are not registered to Ace). We also use these means in order to assist us in delivering cookies, counting visits to Ace, understanding usage effectiveness and attribution of users referred to third party services, such as search engines or AI service providers. You can disable cookies but then your online experience on Ace may be limited or disabled.

Links and Third Party Services. Ace may make available to you certain third party services, such as Bing search, Google Translate or different GenAI providers and may also contain links to other services, sites and applications, all of which are subject to such third party privacy and data protection policies.

Children. We do not intend to collect PII from anyone we know to be under 16 years old. If you believe that we might have collected such information, please contact us.

PII Sharing. We grant access to your PII to our affiliates, agents, representatives, and third party providers for the legitimate purposes set forth herein, e.g. cloud provider and LLM provider. In addition, we may share your PII: if required for the provision, maintenance and improvement of Ace; to satisfy applicable law; when permitted by you; to prevent fraud or harm; or in the event of a merger, acquisition or other structural change or form of sale of part or all of our assets. If you visit a website, remember that its provider can collect your PII directly, regardless of our privacy practices.

PII Security. We follow generally accepted industry standards to protect against unauthorized access, alteration, disclosure or destruction of your PII, however no online product can guarantee absolute security. We retain your PII only for as long as reasonably necessary to provide you with services and support your use of Ace. We also retain PII for longer periods if required in order to investigate wrongdoing, or to fulfill a legitimate business need or to comply with any applicable legal or ethical reporting or document retention requirements.

Data Integrity. We process PII only for the purposes for which it was collected and take reasonable steps to ensure that the PII we process is accurate, complete and current. However, we depend on you to rectify your PII when necessary.

Your Rights. At any time, you may contact us and request to exercise your rights in accordance with applicable law. For more details see Section 14 below.

Enforcement. We will cooperate with the appropriate regulatory authorities to resolve any formal written complaints regarding processing of PII that cannot be resolved between us and the complaining individual.

Transferring of PII. Your PII may be stored and processed in a country outside the country of your residence or from which you access Ace.

Your U.S. State Privacy Rights. For more details see Section 19 below.

ACE PRIVACY POLICY

IMPORTANT: BY DOWNLOADING, ACCESSING OR USING ACE AI LABS INC.'S OR ITS AFFILIATES', AS THE CASE MAY BE ("**COMPANY**" OR "**WE**"), ACE BROWSER AND/OR AI CHAT & ASSISTANT AND ANY FEATURES OR SERVICES THEREIN ("**ACE**") YOU ("**YOU**") CONSENT TO THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY AND CONSENT THAT ALL PERSONALLY IDENTIFIABLE INFORMATION ("**PII**") THAT YOU SUBMIT OR THAT IS PROCESSED, USED OR COLLECTED THROUGH ACE MAY BE PROCESSED BY THE COMPANY AND ITS AFFILIATES IN THE MANNER AND FOR THE PURPOSES DESCRIBED IN THE FOLLOWING PRIVACY POLICY ("**PRIVACY POLICY**"). SUCH CONSENT IS NOT IN LIEU OF OTHER LEGAL BASIS OF PROCESSING, WHERE THESE ARE IN EFFECT, AS DETAILED BELOW.

WE DEFINE "**PII**" TO MEAN ANY INFORMATION RELATING TO AN IDENTIFIED OR IDENTIFIABLE NATURAL PERSON; AN IDENTIFIABLE NATURAL PERSON IS ONE WHO CAN BE IDENTIFIED, DIRECTLY OR INDIRECTLY, IN PARTICULAR BY REFERENCE TO AN IDENTIFIER SUCH AS A NAME, AN IDENTIFICATION NUMBER, LOCATION DATA, AN ONLINE IDENTIFIER OR TO ONE OR MORE SPECIFIC FACTORS.

YOU ARE NOT LEGALLY REQUIRED TO PROVIDE US WITH PII, HOWEVER, SOME OF THE FEATURES AND SERVICES IN ACE REQUIRE YOU TO DO SO PURSUANT TO THIS PRIVACY POLICY. IN THESE CASES, IF YOU CHOOSE TO WITHHOLD ANY PII REQUESTED BY US, IT MAY NOT BE POSSIBLE FOR YOU TO ACCESS OR USE CERTAIN FEATURES OR SERVICES. IF YOU DO NOT AGREE TO THE TERMS AND CONDITIONS SET FORTH HEREIN, PLEASE DO NOT DOWNLOAD, ACCESS OR USE ACE. YOU REPRESENT AND WARRANT THAT: (I) YOU HAVE ALL RIGHTS, PERMITS AND CONSENTS: TO PROVIDE COMPANY WITH THE PII, AND FOR COMPANY'S COLLECTION AND PROCESSING OF THE PII AS DETAILED IN THIS PRIVACY POLICY; AND (II) YOU SHALL AT ALL TIMES COMPLY WITH ALL APPLICABLE LAWS, RULES AND REGULATIONS.

We recognize that privacy is important. This Privacy Policy applies to all of the services, information, tools, features and functionality available on Ace and covers how PII that the Company collects and receives, including in respect of any use of Ace, is treated. Please note that Ace also makes available certain third party services that are subject to the third party terms instead of this policy, as detailed below.

Please also read the Terms of Use available at: https://ace.ai/terms, which describes the terms under which you use Ace. This Privacy Policy is subject to the Terms of Use.

POLICY

1. **Information We Collect and How We Use It**. In order to provide and improve Ace and to understand the usage trends and preferences of our users or for our business purposes, we may collect and process PII, including the following types of information:

   Processing which is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract (GDPR Article 6(1)(b)) OR Processing which is necessary for compliance with a legal obligation to which Company is subject (GDPR Article 6(1)(c)):

   1.1. **Registration Information**.

      1.1.1. **Imported Data**. You may import your data from previous browsers. If you do so, the following will be imported to Ace and be retained on your device: Browsing history, download history, passwords and auto-fills, bookmarks, top used sites.

      1.1.2. **Registration**. We may offer certain services to registered users. As part of the registration process, we may collect and process PII such as full name, e-mail address, phone number, country, and billing information (not including payment card details).

   1.2. **Payment Card**. When you pay for any features or services on Ace, you will be referred to a third party payment service provider. Although the payment form will be presented in Ace,

this service is provided to you directly by such provider and is subject to the provider's terms of service and privacy policy. We do not retain payment card data. Currently transactions are processed by Stripe and its affiliates.

1.3. **Usage Information**. See Sections 2-4 below.

Processing which is necessary for the purposes of the legitimate interests pursued by Company or by a third party (GDPR Article 6(1)(f)) of providing efficient and effective services to our customers, including:

1.4. **Third Parties**. We sometimes supplement the information that you provide with information that is received from third parties, in order to validate or correct data or provide log-in options.

1.5. **User Communications**. When you send emails or other communication to the Company, we may retain those communications in order to process your inquiries, respond to your requests and improve Ace. We may send you push notifications to send you news and updates in respect of Ace. We may send surveys in order to understand your needs, receive feedback and improve or personalize Ace. We may also send you newsletters and promotional communications, you may opt-out of this service at any time by submitting a request to the following link: https://ace.ai/unsubscribe.

1.6. **User Information**. When you use Ace, we will automatically receive and record information from your browser, including without limitation information and statistics about your online/ offline status, IP address, IP block for general location, internet service provider, search history, type of browser, your regional and language settings and software and hardware attributes, session time, impressions and cookies information. Our systems may automatically record and store technical information regarding your user experience. An IP address is a numeric code that identifies your browser on a network, or in this case, the Internet. Your IP address is also used to gather broad demographic information. The Company uses all of the PII that we collect to understand the usage trends and preferences of our users and to improve Ace.

1.7. **Aggregate and Analytical Data.** In an ongoing effort to better understand and serve the users of Ace, we often conduct research on user demographics, interests and behavior based on the PII and other information provided to us. This research may be compiled and analyzed on a pseudonymized or de-identified individual basis or on an aggregate basis, and we may share aggregate de-identified data with affiliates, agents and business partners. The aggregate information does not identify you personally. We may also disclose aggregated user statistics in order to describe our services to current and prospective business partners or investors, and to other third parties for other lawful purposes.

2. **Browsing**.

2.1. Web search is provided via a third party search provider and subject to such provider's terms and conditions and privacy policy, including log-in to the web search account. This is made available to you for your convenience.

2.2. You can delete your browsing history in Ace by clicking settings=>history=>delete browsing data. For browsing data retained by the search provider, please review the terms of the third party search provider. Please note that doing so will not delete your browsing history from our databases, in order to do so you must submit a request pursuant to Section 14 below.

2.3. You can also open settings to delete your download history, passwords and other sign-in data and autofill form data.

2.4. We sometimes enrich your browsing experience with additional content and summaries on top of native content.

3. **Incognito Mode.**

3.1. You can also choose to browse the web in incognito mode, if you want to browse privately from other people who use your device. When you open an incognito window, a separate

browsing session is started. The incognito session ends when you close all incognito windows and Ace does not retain browsing data from that session.

3.2. When you browse in incognito Ace does not access your account information and previous browsing data, including auto fills and passwords. Incognito mode does not change how data is collected by websites you visit and related services and does not prevent or restrict their data collection and processing activities. During the incognito session, Ace temporarily processes browsing information required for visiting sites and browsing.

3.3. Downloads, bookmarks and reading list items are saved. Incognito mode does not affect AI chats.

4. **Artificial Intelligence**.

4.1. We offer AI services on Ace, which will be clearly identified as such, including GenAI features. We may also use AI tools in order to improve the quality and efficiency of Ace. By accessing or using Ace you hereby consent that PII, which was either shared with us actively by you or collected as part of regular usage (such as IP address), will be accessed, stored and processed by such AI tools.

4.2. Your conversations with AI are NOT shared with advertisers, but we can process them internally in order to personalize your chat experience, including by presenting sponsored content.

4.3. Where we use third party AI services within Ace, under our UI or branding, then we require the AI service provider not to use your PII for training models. If we grant you access to third party AI services, identifying the AI platform's name or provider's name, you should review their terms of use and privacy policy and use such AI service at your risk. Please note that when we present GenAI output, we may screen the original results and modify the results presented to you for personalization, optimization or enhancement.

4.4. You can delete AI chat history, this however does not delete browsing data, cookies, or other data specific to Ace, which can be deleted as explained in Section 2 above. Please note that doing so will not delete your AI chat history from our databases (other than Google user data, see Section 5 below), in order to do so you must submit a request pursuant to Section 14 below.

5. **Google User Data**. If you connect a Google account, Ace can access the Google data you authorize: Gmail messages, drafts and labels; Google Calendar events; Google Contacts, including Other contacts; Google Drive files; and Google Docs, Sheets and Slides. In this Section, "Google user data" means information we receive through Google APIs and any information aggregated, anonymized or derived from it, including AI chat responses on Ace that quote or summarize it. Ace accesses this data only when you ask the AI assistant to do something with it, such as summarizing an email, drafting a reply, scheduling a meeting, or editing a document. This Section prevails over any other part of this Privacy Policy with respect to Google user data.

5.1. **How We Use It**. We use Google user data only to provide the features you request in Ace. We do not use Google user data to serve ads, including personalized, retargeted or interest-based ads, to build advertising or user profiles, to present sponsored content, to determine creditworthiness or for lending purposes, or for any purpose unrelated to your request. AI chats that use Google user data do not show shopping, sponsored results, or affiliate or other monetized links.

5.2. **Actions on Your Behalf**. When you ask, and only after you approve a preview, Ace can act in your Google account: send emails, create, change or delete calendar events, create or edit documents, sheets and slides, move emails to trash, move files Ace created to trash or delete them, and share Drive files, or delete emails, events or files. To do this we send the content of the action to Google.

5.3. **Sharing**. We do not sell Google user data or transfer it to advertising platforms, data brokers or information resellers. We share it only with our corporate affiliates and the cloud and AI service providers and other processors, as necessary to process your request on our behalf. Such third parties may not use it to train AI models. We may also share your Google user data as required by law or for security purposes, such as investigating abuse.

5.4. **AI Models**. We do not use Google user data, and Google Workspace APIs are not used, to develop, improve or train non-personalized AI or machine-learning models, and we do not transfer Google user data to anyone for that purpose.

5.5. **Human Access**. Our staff do not read your Google user data unless you give us your express permission for specific messages, files or other data (for example, when you ask our support team to look into a problem), it is needed for security (for example, investigating a bug or abuse) or to comply with law, or it is aggregated and anonymized for internal operations.

5.6. **Storage and Security**. We store the refresh token Google issues, encrypted with keys protected by a key management service. To continue a conversation, Ace keeps the Google data it fetched in that conversation's working memory, which expires 14 days after the conversation's last message, or earlier when you delete the conversation or your account. An action waiting for your approval is kept for up to 1 hour. That data is not saved in your chat history, which keeps only the assistant's replies, which may quote it. AI chats that use Google user data are excluded from our analytics and AI-monitoring tools. Google user data we store, including those chats, is encrypted in transit and at rest.

5.7. **Retention and Deletion**. You can disconnect Google at any time in Ace settings; we then revoke our access with Google and delete the stored token. You can delete chats from your history, and deleting your account deletes your chats. We keep chats that used Google user data for as long as your account is active, unless you delete them earlier. When you delete an AI chat that used Google user data, or your account, we delete it within 30 days. Disconnecting does not delete past chats. You can also revoke Ace's access from your Google Account settings, in which case we delete the stored token the next time Ace tries to use it.

5.8. **Changes**. If we change how we use Google user data, or want to access a type of Google data not described here, we will tell you and ask for your consent before doing so.

5.9. **Limited Use**. Ace's use and transfer of information received from Google APIs to any other app will adhere to the Google API Services User Data Policy, including the Limited Use requirements. The use of information received from Google Workspace scopes will adhere to the Google Workspace User Data and Developer Policy, including the Limited Use requirements.

5.10. **Legal Basis (EEA and UK Users)**. We process Google user data because it is necessary to perform our contract with you, by completing the requests you make (GDPR Article 6(1)(b)). Google user data may include information about other people, such as the senders of your emails or your contacts; we process it only to complete your requests.

6. **Profiling and Automated Decision Making**. We create a profile of our users based on their use of Ace. If you are not a registered user, we do so based on persistent identifiers that do not allow us to identify you personally. We do so in order to personalize the services and outputs presented in chat queries and GenAI outputs. We do not rely on such profiling for any automatic decision making that may affect the rights or freedoms of the data subject.

7. **Cookies and Web Beacons**. In order to collect the data described herein we may use temporary cookies that remain on your browser for a limited period of time. We may also use persistent cookies that remain on your browser until Ace is removed, in order to manage and maintain Ace and record your use of Ace. We use cookies for attribution when referring or linking to third party

services, for log-in purposes, to trace session data and analytics and to personalize Ace. Cookies by themselves cannot be used to discover the identity of the user. A cookie is a small piece of information which is sent to and stored on your browser. Cookies do not damage your browser. Most browsers may allow you to block cookies but you may not be able to use some features on Ace if you block them. You may set most browsers to notify you if you receive a cookie (this enables you to decide if you want to accept it or not). We may also use web beacons in order to collect information. Web beacons or "gifs", are electronic images that may be used on Ace or in our emails. We use Web beacons to deliver cookies, count visits and to tell if an email has been opened and acted upon.

8. **Links and Third Party Services**. Links to or interactions with other services, sites, resources, databases and applications may be provided or required by the Company as part of using Ace or some of its features. For example search functionality, Google Translate and results of AI queries. You may also elect to use add-ons or extensions with Ace, note that you do so at your own risk and subject to the terms and privacy policy of the provider or developer of such add-ons and extensions. The Company is not responsible for the privacy practices or the content of other services, sites, resources, databases and applications and you visit and use them at your own risk and Company shall not be responsible or liable for damages or losses caused in connection therewith. This Privacy Policy applies solely to PII collected and processed by the Company. Some links presented within Ace, including links that may appear in organic AI chat results, may be affiliate or otherwise monetized links for which the Company receives compensation based on traffic or transactions. We do not modify organic AI results in exchange for such compensation, and our receipt of such compensation does not constitute a sale of your PII.

9. **Children**. If you are under the age of 16, please do not use Ace. The Company does not knowingly collect PII from, contact or engage with children under the age of 16. If you have reason to believe that a child has provided us with their PII, please contact us at privacy@ace.ai and we will endeavor to delete that PII from our databases.

10. **Information Sharing**. In order to provide, maintain and improve Ace, and for the other purposes set forth herein, certain third parties may have access to your PII, including Company's corporate affiliates and service providers. The Company may also share PII in the following circumstances: (a) as required for the ongoing operations, provision, maintenance and improvement of Ace; (b) when permitted by you; (c) if we become involved in a reorganization, merger, consolidation, acquisition, or any form of sale of some or all of our assets, with any type of entity, whether public, private, foreign or local; and/or (d) to satisfy applicable law or prevention of fraud or harm or to enforce applicable agreements and/or their terms, including investigation of potential violations thereof or in response to a court order, judicial or administrative subpoena or warrant, or to otherwise cooperate with law enforcement investigations; (e) to our corporate affiliates or other third party service providers, subcontractors and representatives for the purpose of processing PII on our behalf.

11. **Information Security and Retention**. We follow generally accepted industry standards to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of PII. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially reasonable means to protect your PII, we cannot guarantee its absolute security.

12. **Data Retention**.

    12.1. Company will retain PII in accordance with its record retention policy. We retain PII for twenty four (24) months following the end of our engagement, in order to allow users to return. We retain PII that is required to meet any audit, compliance and business best-practices for the term for which it is required to fulfill these purposes, which may be longer than the above. For retention of Google user data see Section 5 above.

    12.2. We may retain aggregate or de-identified data indefinitely.

13. **Data Integrity.** The Company processes PII only for the purposes for which it was collected and in accordance with this Privacy Policy or any applicable service agreements. We review our data collection, storage and processing practices to ensure that we only collect, store and process the PII needed to provide or improve Ace. We take reasonable steps to ensure that the PII we process

is accurate, complete, and current, but we depend on our users to update or correct their PII whenever necessary. Nothing in this Privacy Policy is interpreted as an obligation to store information, and we may, at our own discretion, delete or refrain from recording and storing any and all information.

14. **Your Rights**. Subject to certain exemptions or derogations, the following rights may apply to certain individuals:

    14.1. **Right of Access and Rectification**. You have the right to know what PII we collect about you and to ensure that such data is accurate and relevant for the purposes for which we collected it. We allow our users the option to access and obtain a copy of their PII and to rectify such PII if it is not accurate, complete or updated. However we may first ask you to provide us certain credentials to permit us to identify your PII.

    14.2. **Right to Delete PII or Restrict Processing**. You have the right to delete your PII or restrict its processing. We may postpone or deny your request if your PII is in current use for the purposes for which it was collected or for other legitimate purposes such as compliance with legal obligations.

    14.3. **Right to Withdraw Consent**. You have the right to withdraw your consent to the processing of your PII. Exercising this right will not affect the lawfulness of processing your PII based on your consent before its withdrawal.

    14.4. **Right of Data Portability**. Where technically feasible, you have the right to ask to transfer your PII in accordance with your right to data portability.

    14.5. **Verification of Identity**. You may exercise the above rights by sending a request to privacy@ace.ai. If we receive any request from You, we will use a two-step process for online requests where you must first clearly submit the request and then separately confirm the request. We will use other appropriate measures to verify requests received from you. When submitting a request, you must provide sufficient information to identify yourself, such as name, e-mail address, home or work address, or other such information that is on record with us so that we can match such information to the Personal Information that we maintain. Do not provide passwords, credit or debit card numbers, medical information or health information with requests. If your request is unclear or submitted through means other than described above, we will give you specific directions on how to submit the request or remedy any deficiencies. If we cannot verify your identity, we may deny the request.

    14.6. **Right to Lodge Complaint**. You also have the right to lodge a complaint with a data protection supervisory authority regarding the processing of your PII.

15. **Enforcement**. The Company regularly reviews its compliance with this Privacy Policy. Please feel free to direct any questions or concerns regarding this Privacy Policy or our treatment of PII by contacting us as provided above. When we receive formal written complaints it is the Company's policy to contact the complaining user regarding his or her concerns. We will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of PII that cannot be resolved between the Company and an individual.

16. **Changes to This Privacy Policy**. The Company may update this Privacy Policy. We will notify you about material and significant changes in the way we treat PII by sending a notice to the email address provided by you or by placing a prominent notice on Ace. We encourage you to periodically review this Privacy Policy for the latest information about our privacy practices.

17. **Legal Justification and Consent to Processing.**

    17.1. By providing any PII to us pursuant to this Privacy Policy, all users, including, without limitation, users in the United States and member states of the European Union, fully understand and unambiguously consent to this Privacy Policy and to the collection and processing of such PII abroad. The servers used in connection with Ace may be outside the country from which you access Ace and may be outside your country of residence. Some of the uses and disclosures mentioned in this Privacy Policy may involve the transfer of your PII to various countries around the world that may have different levels of privacy protection

than your country and may be transferred outside of the European Economic Area. If there is a transfer of your PII outside the EEA we will use a valid transfer mechanism, e.g. an adequacy decision or standard contractual clauses. By submitting your PII to Ace, you consent, acknowledge, and agree that we may collect, use, transfer, and disclose your PII as described in this Privacy Policy.

17.2. PII used in order to provide you with services or support Ace is processed based on the legal basis that processing is necessary for the performance of a contract between you and Company.

17.3. PII retained for security, compliance with laws and standards, placing ads, including contextual ads and sponsored content, audits, support, attribution and improvement of Ace, is processed based on a legitimate interest.

18. **Questions**. If you have any questions about this Privacy Policy or concerns about the way we process your PII, please contact our DPO at privacy@ace.ai.

19. U.S. State Privacy Rights.

19.1. **Scope**. This Section of our Privacy Policy supplements the information in the rest of this Privacy Policy and applies to individual residents of U.S. states that have enacted comprehensive consumer privacy laws, including California, Colorado, Connecticut, Delaware, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oklahoma, Oregon, Rhode Island, Tennessee, Texas, Utah, and Virginia, together with similar applicable state consumer privacy laws that are in effect or may be enacted in the future (collectively, the "**CCPA**"). For California residents, "Personal Information" has the meaning given in the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (the "**CPRA**"), and any regulations promulgated thereunder. For residents of other states, "Personal Information" (or "**Personal Data**") has the meaning given in the applicable State Privacy Laws. This Section does not apply to:

19.1.1. information exempted from the scope of the applicable State Privacy Laws;

19.1.2. activities governed by a different privacy notice, such as notices we give to personnel or job candidates; or

19.1.3. Personal Information we collect, use, and share on behalf of our customers as a "**service provider**" or equivalent designation under the applicable State Privacy Laws.

19.2. **Your Privacy Rights**. Under the State Privacy Laws, you may have the following rights, subject to certain exemptions and limitations:

19.2.1. **Right to Information/Know**. You can request whether we have collected your Personal Information, and in certain cases, the following information about how we have collected and used your Personal Information during the past 12 months:

19.2.1.1. The categories of Personal Information we have collected.

19.2.1.2. The categories of sources from which we collected the Personal Information.

19.2.1.3. The business or commercial purpose for collecting, sharing, and/or selling Personal Information.

19.2.1.4. The categories of Personal Information that we sold or disclosed for a business purpose.

19.2.1.5. The categories of third parties to whom Personal Information was sold, shared, or disclosed for a business purpose.

19.2.2. **Right to Access**. You can request a copy of the Personal Information that we have collected about you during the past 12 months.

19.2.3. **Right to Correction**. You can request that we correct inaccurate Personal Information that we have collected about you.

19.2.4. **Right to Deletion**. You can ask us to delete the Personal Information that we have collected from you.

19.2.5. **Right to Opt-Out of Sale, Sharing, and Targeted Advertising**. While we do not "sell" Personal Information for monetary consideration, like many companies, we use services that help present you with ads regarding Ace while you visit other products, services and websites. Under the State Privacy Laws, our use of some of these services may constitute "sharing" or processing for "targeted advertising." You have the right to opt out of such sharing and targeted advertising.

19.2.6. **Right to Nondiscrimination**. You are entitled to exercise the rights described above free from discrimination as prohibited by the applicable State Privacy Laws.

19.2.7. **Shine the Light (California Only)**. California Civil Code Section 1798.83 permits California residents to request information regarding disclosure of PII to third parties for their direct marketing purposes. To make such a request, please contact us at privacy@ace.ai. We respond to one request per customer each year.

19.2.8. **Right to Limit Use of Sensitive Personal Information**. You may request that we limit the use and disclosure of your sensitive personal information to purposes permitted under the applicable State Privacy Laws. We do not use or disclose sensitive personal information for purposes that you have a right to limit.

19.2.9. **Right to Opt-Out of Profiling**. Under certain State Privacy Laws, you have the right to opt out of profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.

19.2.10. **Right to Appeal**. If we deny your privacy rights request, in whole or in part, you have the right to appeal our decision. To submit an appeal, please contact us at privacy@ace.ai. We will respond to your appeal within the time period required by applicable law. If we deny your appeal, you may contact your state attorney general.

19.3. How to Exercise Your Rights.

19.3.1. **Right to Information/Know, Access, Correction, and Deletion**. You can exercise any of these rights by submitting a request through our dedicated email here: privacy@ace.ai.

19.3.2. **Right to Opt-Out of Sale, Sharing, and Targeted Advertising**. You can submit requests to opt out of sharing and targeted advertising by using our cookie preference tool. Your opt-out request will apply to the browser and device from which you submit the request.

19.4. **Verification of Identity**. If we receive any request from You, we will use a two-step process for online requests where you must first clearly submit the request and then separately confirm the request. We will use other appropriate measures to verify requests received from you. When submitting a request, you must provide sufficient information to identify yourself, such as name, e-mail address, home or work address, or other such information that is on record with us so that we can match such information to the Personal Information that we maintain. Do not provide social security numbers, driver's license numbers, passwords, credit or debit card numbers, medical information or health information with requests. If your request is unclear or submitted through means other than described above, we will give you specific directions on how to submit the request or remedy any deficiencies. If we cannot verify your identity, we may deny the request.

19.5. **Response Timing and Format**. We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to an additional 45 days), we will inform you of the reason and extension period in writing. We will deliver our written response by e-mail. Disclosures we provide may only cover the 12-month period preceding receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

19.6. Personal Information that we Collect, Use and Disclose. The table below describes our Personal Information practices by reference to the categories in the "Information We Collect and How We Use It" Section above and the statutory categories described in the CCPA (Cal. Civ. Code Section 1798.140(v)), which are used here as a reference framework for all applicable State Privacy Laws and describes our practices currently and during the 12 months preceding the effective date of this Privacy Policy. Information you voluntarily provide to us, may contain other categories of personal information not described below. Note that:

19.6.1. We do not "sell" Personal Information as defined by the applicable State Privacy Laws and have not sold Personal Information in the preceding 12 months.

19.6.2. To the extent that some of our data transfers are deemed as "sharing" or processing for "targeted advertising" under the applicable State Privacy Laws, e.g., sharing online identifiers in order to present you with advertisements of Ace on other websites and services, the following categories are relevant: pixel data and online identifiers used for presenting ads of Ace on other websites or services.

19.6.3. We do not use or disclose sensitive personal information for purposes that residents have a right to limit under the applicable State Privacy Laws. If you connect a Google account, the Google user data described in Section 5, which may include the contents of your email messages, is collected from Google at your direction, used only to provide the features you request, disclosed only as described in Section 5.3, and not sold or shared.

CCPA statutory category Personal Information "PI" we collect in this category	**Business/commercial purpose for collection**	**Categories of third parties to whom we disclose PI**	**Sources**	**Sold or Shared?**

(A) Identifiers • *Registered Users*: Name, email address, phone number, Internet Protocol address, address, advertiser ID and device ID. • *Unregistered Users*: Internet Protocol address, advertiser ID and device ID.	To provide, maintain, personalize and improve Ace; to understand usage trends and preferences; to present ads or sponsored content; to process payments; to respond to inquiries and improve services; to conduct research and analytics; to protect against fraud and threats.	Corporate affiliates; cloud and infrastructure service providers; AI and LLM service providers; analytics service providers; advertising partners; payment service providers; as required by law or in connection with a corporate transaction.	From you and completing or correcting data from third party service providers, from data imported from a previous browser, from your interactions with advertisements, online IDs and IP addresses also from ad exchanges.	Online identifiers shared for targeted advertising. Not sold.
(B) California Personal Record Statute • *Registered Users*: Name, address, phone number, payment card and billing information. • *Unregistered User*s: None unless included in browsing or AI chat data.	To provide, maintain, personalize and improve Ace; to understand usage trends and preferences; to present ads or sponsored content; to process payments; to respond to inquiries and improve services; to conduct research and analytics; to protect against fraud and threats.	Corporate affiliates; cloud and infrastructure service providers; AI and LLM service providers; analytics service providers; advertising partners; payment service providers; as required by law or in connection with a corporate transaction.	From you and completing or correcting data from third party service providers.	Not sold or shared.

(F) Internet or network information Browsing history, search history, AI chat history, information regarding your interaction with websites and advertisements, cookies.	To provide, maintain, personalize and improve Ace; to understand usage trends and preferences; to present ads or sponsored content; to process payments; to respond to inquiries and improve services; to conduct research and analytics; to protect against fraud and threats. To provide browsing, search, and AI services; to deliver, attribute, and personalize content and advertisements.	Corporate affiliates; cloud and infrastructure service providers; AI and LLM service providers; analytics service providers; advertising partners; payment service providers; as required by law or in connection with a corporate transaction.	From your use of Ace and data imported from a previous browser. Browsing data, state and other demographics also from ad exchanges for presenting you with ads of Ace on other websites and services.	Online identifiers and browsing data may be shared for targeted advertising. Not sold.
(G) Geolocation Geoblock.	To provide, maintain, personalize and improve Ace; to understand usage trends and preferences; to present ads or sponsored content; to process payments; to respond to inquiries and improve services; to conduct research and analytics; to protect against fraud and threats.	Corporate affiliates; cloud and infrastructure service providers; AI and LLM service providers; analytics service providers; advertising partners; payment service providers; as required by law or in connection with a corporate transaction.	From your device.	Not sold or shared.

(K) Inferences drawn from any of the information above Preferences and personalization of the service based on the information above, including personalized ads and personalized AI output, which may include sponsored content.	To provide, maintain, personalize and improve Ace; to understand usage trends and preferences; to present ads or sponsored content; to process payments; to respond to inquiries and improve services; to conduct research and analytics; to protect against fraud and threats.	Corporate affiliates; cloud and infrastructure service providers; AI and LLM service providers; analytics service providers; advertising partners; payment service providers; as required by law or in connection with a corporate transaction.	By us or using analytics service providers.	Not sold or shared.
(C) Protected Classification Characteristics Not collected.	N/A.	N/A.	N/A.	N/A.
(D) Commercial Information Billing information (not including payment card details) and records of services or features purchased on Ace.	To process payments and provide purchased services; to maintain and improve Ace; to comply with legal obligations.	Payment service providers; corporate affiliates; as required by law.	From you when you register or purchase services on Ace.	Not sold or shared.
(E) Biometric Information Not collected.	N/A.	N/A.	N/A.	N/A.
(H) Sensory Data Not collected.	N/A.	N/A.	N/A.	N/A.

(I) Professional or Employment-Related Information Not collected.	N/A.	N/A.	N/A.	N/A.
(J) Non-Public Education Information Not collected.	N/A.	N/A.	N/A.	N/A.
(L) Sensitive Personal Information Other than the contents of your email messages if you connect a Google account (see Section 5), we do not intentionally collect sensitive personal information. However, any category of sensitive personal information (such as racial or ethnic origin, religious beliefs, health information, or sexual orientation) may be included in content you voluntarily provide through browsing data or AI chats.	To provide services to you as part of Ace; to respond to inquiries and improve services; to conduct research and analytics; to protect against fraud and threats.	Corporate affiliates; cloud and infrastructure service providers; AI and LLM service providers; analytics service providers; payment service providers; as required by law or in connection with a corporate transaction.		Not sold or shared.

Last Date Updated: November 3, 2026.