



# Privacy Policy

Effective Date: Feb 26th, 2026

## PLEASE READ THIS PRIVACY POLICY CAREFULLY

Cupix, Inc. (together with our affiliates, "**Cupix**", "**we**", "**us**", or "**our**") is committed to protecting the privacy and security of your Personal Data. This Privacy Policy describes our practices with respect to Personal Data that we collect from or about you when you use our website, applications, and services (collectively, the "**Services**"). By using the Services, you acknowledge that you have read and understand this Privacy Policy, subject to any rights or requirements imposed by applicable law. If you do not agree to this Privacy Policy, please do not use the Services.

"**Personal Data**" means any information related to a natural person or Data Subject that can be used to directly or indirectly identify the person.

For the purposes of the EU General Data Protection Regulation ("**GDPR**") and the UK GDPR, Cupix, Inc. is the Data Controller with respect to Personal Data collected for its own business purposes. Where Cupix processes Personal Data contained in customer content solely on behalf of customers as part of providing the Services, Cupix acts as a data processor in accordance with the Terms of Service. You remain responsible for determining the purposes and means of processing Personal Data contained in Your Content, as described in the Terms of Service

## 1. Collection of Information

### 1.1 Registration and Payment Information

When ordering, registering or using the Services, as appropriate you will directly provide or submit information to us. Registration and payment information includes, for example:

- Your name and account credentials
- Billing information such as billing address or credit card information
- Your contact information such as your e-mail address or mailing address
- All content that you create, share or upload to the Services in connection with your account, which is treated as "Your Content" under the Terms of Service.

### 1.2 Your Content

As described in our "Terms of Service", Your Content such as 360-degree photos, designs, models, data sets, images and documents will be submitted or uploaded to our cloud server in



the course of engaging with the Services. Photos or any similar materials may include incidental Personal Data. We do not use such Personal Data for any purpose other than providing, maintaining, securing, and improving the Services in accordance with the Terms of Service.

However, this information may be publicly displayed if you choose to publish the results created from your use of the Services (the “**Results**”). If you do not want to publicly display Personal Data within these photos, you should not publish the Results containing these photos. You may also disable or hide photos containing Personal Data before publishing Results.

### 1.3 Automatically Collected Information

When you use the Services, we automatically collect certain information about you through the Services, such as:

- Your internet protocol (IP) address, request URL, and general geographic location
- The date and time associated with your access and transactions within the Services
- Metadata associated with Your Content
- Your usage and interaction data with the Services (such as the links you click and pages you view), and other standard server-log information

## 2. The Purposes of Processing Your Information

We will use your information which may include Personal Data we collect to provide and improve the Services. Examples of such use include:

- Develop and improve the Services
- Understand your needs and interests to provide personalized Services
- Administer your use of the Services and process your transactions and billing
- Enhance the security and safety of the Services by identifying and authenticating “You”
- Send you periodic information about us including newsletters, voluntary surveys, new applications, special offers or promotions, and information about events and updates. You may opt out of receiving promotional emails at any time by using the unsubscribe mechanism provided in such communication.
- Conduct data and system analytics, including research to improve the Services
- Use data in anonymized form for AI model development, where such data cannot reasonably be used to identify any individual or customer

Where required by applicable law, processing is based on performance of a contract, legitimate interests (including service security and improvement), compliance with legal obligations, or user consent, as applicable to the specific processing activity.



### 3. Protection

We implement a variety of commercially reasonable security measures to help maintain the security of your Personal Data. Sensitive payment information is transmitted via Secure Socket Layer (SSL) encryption and handled by authorized payment processors with restricted access. We use physical, technical, organizational, and administrative safeguards to help protect your Personal Data from unauthorized access or loss.

### 4. Disclosure

We do not sell Personal Data. We may share Personal Data to with outside parties when we have your consent or to provide products or services you have requested. This does not include service providers and sub-processors that support our business operations and are contractually required to protect Personal Data. We may, however, share anonymous data in anonymized or aggregated form with third parties for analytics, research, or service improvement.

We may disclose information about you in any of the following situations: (i) In response to a subpoena, warrant or any request from a court or other governmental entity that seeks data relating to the Services, (collectively, a “**Legal Request**”), we may be legally obligated to release your information; (ii) To enforce the Services’ policies or to protect ours or others’ rights, property or safety; (iii) In the event of a merger, acquisition or bankruptcy, management of our customer information may be transferred to its successor or assign; and (iv) we may disclose information in anonymized or aggregated form that does not reasonably identify you (e.g. in marketing, advertising, analytics or other uses to improve the Services).

### 5. Transferring Data Internationally

Our headquarters are based in South Korea and we operate cloud services using Amazon Web Services. Your Personal Data is stored in one of its data centers in the United States. Other components of Your Content, including photos, may be stored in the Amazon Web Services region geographically closest to the address that you provided us.

Your Personal Data may be transferred to, stored at or processed in other countries, including the United States, Singapore, Australia, and United Kingdom, and other countries, which may not have equivalent privacy or data protection laws. Such countries may not provide the same level of data protection as your home jurisdiction. Where required by applicable law, we implement appropriate safeguards for such transfers. Regardless of where your Personal Data is processed, we will protect it in accordance with this Privacy Policy and applicable law.



By using the Services, you acknowledge that your Personal Data may be transferred, stored, and/or processed as described above.

## 6. Data Retention

We will retain your Personal Data for as long as you have your account with us, or as long as is needed for us to be able to provide the agreed Services to you. Deletion or return of Your Content is governed by the Terms of Service.

This may include keeping your Personal Data after you have deactivated your account for the period of time needed for us to pursue legitimate business interests, conduct audits, comply with (and demonstrate compliance with) legal obligations, resolve disputes and enforce our Terms of Service. Our general retention period is six (6) years unless a longer period is required or permitted by law.

## 7. Cookies Policy

We do not place first-party cookies for user authentication. However, third-party cookies may be placed on our Web pages. By using the Services, you acknowledge that third-party cookies may be used. Third-party cookies may be used for analytics, functionality, and service improvement.

Our Cookies Policy explains what cookies are, how we use cookies, how third-parties we may partner with may use cookies on the Service, your choices regarding cookies and further information about cookies.

### **What are cookies**

Cookies are small pieces of text sent by your web browser by a website you visit. A cookie file is stored in your web browser and allows the Service or a third-party to recognize you and make your next visit easier and the Service more useful to you. Cookies can be "persistent" or "session" cookies.

### **How we use cookies**

We do not place first-party cookies for user authentication. However, we use various third party software on our Web pages, and they may place a number of cookies files in your web browser when you use and access our web-based Services including the home page. Third-party software may use their cookies to enable certain functions, to provide analytics, and so on.

### **What are your choices regarding cookies**



If you'd like to delete cookies or instruct your web browser to delete or refuse cookies, please visit the help pages of your web browser.

Please note, however, that if you delete cookies or refuse to accept them, you might not be able to use all of the features we offer, and some of our pages might not display properly.

### **Where can you find more information about cookies**

You can learn more about cookies and the following third-party websites:

- AllAboutCookies: <https://www.allaboutcookies.org/>
- Network Advertising Initiative: <https://www.networkadvertising.org/>

Where required by applicable law, you may manage cookie preferences through browser or platform controls.

## **8. Korean Personal Information Protection Act Compliance**

We value your personal information and we have taken the necessary precautions to be in compliance with the Korean Personal Information Protection Act. In accordance with the Korean Personal Information Protection Act, you may access, modify, or delete Personal Data that you have uploaded to the Services by logging into the Services and using account settings. Changes take effect immediately.

## **9. Children's Online Privacy Protection Act Compliance**

We are in compliance with the requirements of COPPA, (Children's Online Privacy Protection Act), and we do not collect any information from anyone under 13 years of age. The Services are directed only to persons who are at least 13 years of age or older. If we detect that any Personal Data of children under 13 years of age has been collected without the consent of a parent or guardian, we will take the proper steps to delete the information.

## **10. EU Citizen's Rights**

If you are located in the European Union or the United Kingdom, you are entitled to the following rights:

- **The right to access** – You have the right to request copies of your Personal Data. We may charge you a fee for this service where permitted by applicable law.
- **The right to rectification** – You have the right to request that Cupix correct any information you believe is inaccurate. You also have the right to request Cupix to complete the information you believe is incomplete.
- **The right to erasure** – You have the right to request that Cupix erase your Personal Data, under certain conditions.



- **The right to restrict processing** – You have the right to request that Cupix restrict the processing of your Personal Data, under certain conditions.
- **The right to object to processing** – You have the right to object to Cupix’s processing of your Personal Data, under certain conditions.
- **The right to data portability** – You have the right to request that Cupix transfer the data that we have collected to another organization, or directly to you, under certain conditions.

You also have the right to lodge a complaint with your local data protection authority.

We will respond to verified requests within one (1) month. If you would like to exercise any of these rights, please contact us using the contact details at the end of this Privacy Policy.

## 11. Changes

We may change, revise or update our Privacy Policy from time to time. When we change or update our Privacy Policy in a material way, a notice will be posted on our website along with the updated Privacy Policy or sent via your email. The “Last Modified” date above reflects the effective date of this Privacy Policy.

## CONTACT CUPIX

If you have any questions about this Privacy Policy, please contact us.

Email: **privacy@cupix.com**

Mail us a letter:

*For Customers and Authorized Users who use Cupix in the USA and Canada:*

Cupix America, Inc.

1 Chisholm Trail Rd #450 Round Rock, TX 78681 USA

or

*For Customers and Authorized Users who use Cupix outside the USA and Canada:*

6 Middlemiss St, Lavender Bay NSW 2060 Australia

*or*

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