

Acta Solutions PRIVACY POLICY

Effective Date: March 03, 2025

1. INTRODUCTION

Acta Solutions LLC ("Acta Solutions", "we", "us", or "our") wants you to be familiar with how we collect, use, and disclose information from and about you because we respect your concerns about privacy, and we want to maintain your trust.

This Privacy Policy applies to information we collect from all sources, including in connection with our websites, applications ("apps"), electronic newsletters, conferences, and events (collectively the "Acta Solutions Services") that link to this Privacy Policy. If there is a conflict between this Policy and Acta Solutions' subscription agreement, the subscription agreement will take precedence.

This Policy describes the types of Personal Data we collect, how we use it, and with whom we share it. It also describes Acta's practices for handling Other Information (e.g., interests, demographics, and services usage) collected through our Acta Solutions Services. We also describe the measures we take to protect the information, your options for choice and access, and how you can contact us about privacy practices. By using the Acta Solutions Services, you acknowledge you have read and accept this Privacy Policy.

2. WHAT WE COLLECT

Acta Solutions collects Personal Data to offer services you have requested or that we have a legitimate interest to believe are of interest to our customers, to manage the relationships we have with our customers and partners, and to perform activities based on your consent.

2.1 Personal Data

"Personal Data" for purposes of this Privacy Policy is the information that identifies you as an individual or relates to an identifiable person.

2.1.1 Personal Data You Submit

We collect Personal Data when you submit it to us, such as when you create a profile; participate in a survey; visit Acta Solutions Services; use an interactive feature (such as chat or feedback); or contact customer service. The Personal Data you submit may include your name, mobile number, email address, or profile picture.

2.1.2 Personal Data We Receive from Third Parties

We do not collect personal data from third parties.

2.2 Other Information

"Other Information" is any information that is not intended to reveal your specific identity to us, such as browser information, usage data, information collected through cookies and other technologies, demographic information, geolocation data obtained with your consent where required by applicable law, and aggregated information.

2.2.1 Other Information You Submit

We collect Other Information when you submit it to us. This may include your password, username, email, and position within your organization.

2.2.2 Other Information We Receive from Third Parties

We do not receive information about you from third parties.

2.2.3 Other Information Collected Automatically

Our system will track frequency of usage and number of clicks on specific components of our interface. Acta Solutions is not responsible for the privacy practices of third parties, and once you leave the Acta Solutions Services you should check the applicable third party privacy policy.

2.3 Data Submitted Through AI-Powered Features

Acta Solutions incorporates artificial intelligence (AI) features to enhance service delivery, including parcel-specific document retrieval, query processing, and staff-facing search tools. When you interact with these AI-powered features, the content of your queries, inputs, and related data (including addresses, Parcel IDs, and associated documents) may be processed by AI systems.

Important: Any data submitted through AI-powered features is used solely to deliver the requested service response. It is never used to train, fine-tune, or otherwise improve AI or machine learning models — whether operated by Acta Solutions or any third party.

3. HOW WE USE YOUR PERSONAL DATA AND OTHER INFORMATION

We may use the Personal Data we collect from and about you for the purposes set forth below. We may use and disclose Other Information for any purpose, except if it is considered Personal Data under applicable law. If we combine Other Information with your Personal Data, we treat the combined information as Personal Data.

3.1 To Provide, Measure and Improve Our Products and Services

We use the information we collect from and about you to provide our products, services, and features to you, including: to process and fulfill your subscription, to create and manage your accounts, to send you information about your relationship or transactions with us, to measure and improve services and features, to allow you to engage with us, to use collaboration tools to share content and collaborate with other users, to provide you with customer support, and to respond to inquiries.

3.2 To Deliver Relevant Content and Recommendations

To make your experience more useful and efficient, we may use Personal Data and Other Information to assist us in delivering relevant content on Acta Solutions Services.

3.3 AI Features — Permitted and Prohibited Uses of Your Data

Where Acta Solutions Services include AI-powered features, your data will only be used to fulfill your specific request in real time. The following restrictions apply without exception:

- **No AI/ML Training:** Your data — including queries, inputs, documents, parcel data, and any outputs generated — will **never** be used to train, fine-tune, evaluate, or improve any artificial intelligence or machine learning model, by Acta Solutions or any third-party AI provider.
- **No Third-Party AI Data Sharing:** Your data will not be shared with any third-party AI or large language model (LLM) provider for purposes beyond processing your individual, real-time request. Acta Solutions contractually requires that any AI infrastructure partners it works with similarly prohibit using customer data for model training.
- **Data Minimization:** AI features are designed to process only the minimum data necessary to respond to your query.

3.4 To Contact You

Acta Solutions may periodically send promotional materials, with your permission where required, surveys, market research, or notifications related to our products and services. We may use and combine Personal Data and Other Information to make these materials more relevant. We may also contact you to respond to your comments, inquiries, or requests.

3.5 To Protect the Rights of Acta Solutions And Others

Acta Solutions may use your Personal Data as we believe to be necessary or appropriate to: protect, enforce, or defend the legal rights, privacy, safety, or property of Acta Solutions or our employees, agents, and contractors; protect against fraud and other unlawful activity; comply with applicable law or legal process; or respond to requests from public and government authorities, to the extent permitted by applicable law.

4. HOW WE SHARE YOUR PERSONAL DATA AND OTHER INFORMATION

4.1 Our Disclosure of Personal Data and Other Information

Acta Solutions may share your Personal Data with Acta Solutions Affiliates or with non-affiliated third parties only when sharing is permitted by you or authorized by this Privacy Policy.

4.1.1 No Sharing with Third-Party AI Providers for Training Purposes

Acta Solutions does not share your Personal Data, queries, document inputs, or any data submitted through AI-powered features with third-party AI or LLM providers for the purpose of training, fine-tuning, or improving AI models. Any AI infrastructure partners used by Acta

Solutions to process requests in real time are contractually bound to this same restriction.

4.1.2 To Manage Corporate, Third Party, and Agency Subscriptions

If your subscription is provided in whole or in part by your employer, agency, or other third party, we may share with them information about your access to and use of your subscription. When providing this information, we may reveal limited amounts of your Personal Data such as your name or email address.

4.1.3 To Allow Third-Party Service Providers to Assist Us

We may make your Personal Data available to third-party service providers, such as contractors, agents, or sponsors, who help us manage or provide our products and services (e.g., sending email messages, processing payments, delivering subscriptions, auditing, or processing data). These third-party service providers are required to protect Personal Data entrusted to them and not use it for any other purpose than the specific service they are providing on our behalf. This expressly includes a prohibition on using any customer data to train AI or machine learning models.

4.1.4 To Protect the Rights of Acta Solutions And Others

There may be instances when Acta Solutions may disclose your Personal Data where we have a good faith belief that such disclosure is necessary to: protect the legal rights, privacy, safety, or property of Acta Solutions or others; protect against fraud or unlawful activity; comply with applicable law or legal process; or respond to requests from public and government authorities, to the extent permitted by applicable law.

4.1.5 To Complete A Merger, Sale of Assets, Or Bankruptcy

If Acta Solutions sells all or part of its business or assets, or is otherwise involved in a merger, reorganization, dissolution, liquidation, or transfer of all or part of its business, Acta Solutions may transfer your information to the party or parties and their advisors involved in the transaction.

5. HOW WE PROTECT AND RETAIN PERSONAL DATA

Acta Solutions uses a combination of administrative, technical, personnel, and physical measures to safeguard Personal Data in its possession against accidental, unlawful, or unauthorized loss, use, access, disclosure, or modification. We make reasonable efforts to ensure a level of security appropriate to the risk of processing, taking into account the costs of implementation and the nature of the processing.

However, no one can guarantee the complete safety of your information. If you believe your interaction with us is no longer secure, please immediately notify us at andrew@actasolutions.io.

We will retain your Personal Data for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or allowed by law.

6. YOUR RIGHTS AND CHOICES

6.1 Your Choices Regarding Our Use and Disclosure of Your Personal Data

You have the following choices regarding our use and disclosure of your Personal Data for marketing purposes.

6.1.1 To Opt Out of Direct Marketing from Acta Solutions

You may opt out of receiving electronic communications from us (including surveys, notifications, or promotions) by unsubscribing from Acta Solutions Services. Please note that certain service notifications — such as renewal notices and policy change notifications — cannot be opted out of.

6.2 How to Access, Correct or Update Your Personal Data

You can access, review, correct, update, delete, or modify your registration or subscription profile information by contacting Customer Service. Most subscribers and registered users can also update their Personal Data online by signing into their accounts. You may also object to or restrict the processing of your Personal Data.

Where you have provided consent for our use of your Personal Data, you have the right to withdraw that consent and we will apply your preferences going forward.

For your protection, we may only implement requests with respect to the Personal Data associated with the particular email address you use to send us your request, and we may need to verify your identity before implementing your request.

6.3 California Privacy Rights

Subject to certain limitations, California law permits customers who are California residents to request certain information regarding our disclosure of Personal Data to third parties for their own direct marketing purposes. To make such a request, California residents may write to us at andrew@actasolutions.io with the subject line: California Resident Privacy Rights.

7. OTHER IMPORTANT INFORMATION

7.1 Updates to Privacy Policy

Acta Solutions may periodically update this Privacy Policy without prior notice to reflect changes in our practices. Please check the Effective Date at the top of this Privacy Policy to see when it was last revised. Any changes will become effective when we post the revised Privacy Policy on the Acta Solutions Services. Your continued use of the Services following any changes means you acknowledge and accept the revised Privacy Policy.

8. CONTACT US

If you have questions about this Privacy Policy, our AI data practices, or how we or our service providers handle your Personal Data, please contact us at:

andrew@actasolutions.io

Or write to:

Attention: Privacy

Acta Solutions

16 W. Martin Street STE 1109

Raleigh, NC 27601

We will respond to your questions and complaints about our processing of your Personal Data. If you are not satisfied with our response, you may contact a supervisory authority. Please do not disclose any sensitive Personal Data (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health, or trade union membership), social security numbers, or criminal background information when contacting us.