

# Privacy Policy

*Last Update: October 1st, 2024*

## 1. Introduction

Welcome to Theneo!

This Privacy Policy (the “Privacy Policy”) constitutes a legally binding agreement between you (“User” or “you”) and Theneo Inc. (“Theneo,” “Company,” “we,” “our,” or “us”) governing your use of the Theneo Website (<https://www.theneo.io>) (the “Website”) and services (collectively, the “Platform”).

Theneo.io is a platform operated by Theneo Inc., a Company duly incorporated under the laws of Delaware, with a registered office at 7511 Greenwood Ave, Seattle WA, 98103.

The new values your privacy and is committed to protecting your personal information. We have diligently endeavored to ensure compliance with all applicable data protection laws, including but not limited to, relevant United States legislation, the European General Data Protection Regulation (GDPR), the EU-US and Swiss-US Privacy Shield Frameworks, and other pertinent data protection regulations.

This Privacy Policy contains how we collect, use, disclose, and safeguard your information when you visit our Website and use our Services.

PLEASE TAKE THE TIME TO READ THIS PRIVACY POLICY CAREFULLY AND ENSURE THAT YOU UNDERSTAND IT.

## 2. Consent

***BY ACCESSING OUR WEBSITE AND SERVICES AND SUBMITTING YOUR PERSONAL INFORMATION THROUGH OUR WEBSITE OR TO OUR EMPLOYEES, YOU EXPRESSLY CONSENT TO THE TERMS OF THIS PRIVACY POLICY. THIS INCLUDES THE TRANSFER, PROCESSING, AND USE OF YOUR PERSONAL INFORMATION BY THENEOP AND ANY THIRD-PARTY SERVICE PROVIDERS FOR MARKETING PURPOSES OR OTHER LAWFUL USES AS DESCRIBED IN THIS PRIVACY POLICY. IF YOU DO NOT AGREE WITH THIS POLICY, PLEASE REFRAIN FROM USING ANY PART OF OUR WEBSITE AND SERVICES.***

By providing your contact details, you agree to receive communications from us directly, through our Website, or via third parties. This includes receiving surveys, research materials, newsletters, offers, and promotional content via email. If you wish to opt out of our

commercial emails, you can do so by clicking the "unsubscribe" link in the email or by contacting us through the contact details available below.

### **3. Note for Minors**

We do not intentionally collect or seek personal information from minors under the age of 18 or the applicable Age of Consent, as defined by the laws of their place of residence. By using or engaging with our Websites or Services, you affirm that you are not a minor.

We encourage parents and guardians to supervise, participate in, and guide their minors' online activities. We do not control or assume responsibility for regulating minors' access to our Website.

If we discover that we have inadvertently collected personal information from a minor without appropriate parental consent, we will promptly delete that information. If you believe we may have information about a minor, please contact us using the details provided below.

### **4. Information We Collect**

The personal information that you are asked to provide, and the reasons why you are asked to provide it, may be made clear to you at the point we ask you to provide your personal information. We only collect personal information that you voluntarily provide when you register for our services, show interest in learning more about our products and services, participate in activities on our platform, or reach out to us directly.

We collect various types of information to enhance our services and facilitate your experience:

- **Personal Identifiable Information (PII):** The personal information we collect varies based on the nature of your interactions with us, the services you engage with, the preferences you set, and the products or features you use. This information may include but is not limited to your name, email address, and other contact information provided during registration, using Platform, or through direct communication with us.
- **Account information:** Includes your username, password, and security questions for accessing our Services.
- **Social Media Login Data:** If you choose to register or log in to our services using your social media account (e.g., Facebook, Google, or other platforms), we may collect certain information from your social media profile, such as your name, email address, friends list, profile picture, and any other information you have made publicly available on the platform. This information is used to facilitate account creation and login, improve your user experience, and enable features like social sharing. We will only access and use this information by the permissions granted by

your social media account and in line with this Privacy Policy. You can manage the data shared with us by adjusting your social media account privacy settings.

- **Payment Data:** When you make a payment for our services, we collect the payment information necessary to process your transaction. Payments are handled through a third-party payment processor, Stripe. The payment data collected may include information such as your name, billing address, payment method details (such as credit card number or other financial account information), and transaction details. Please note that we do not store or have access to your full payment details. Stripe securely processes all payment transactions in accordance with its privacy policies. We recommend reviewing Stripe's Privacy Policy (<https://stripe.com/privacy>) to understand how your payment information is handled. By making a payment, you agree to allow Stripe to process your payment information in line with their security standards and data protection practices.
- **Log Files:** Just like with most websites and online services, when you visit our Website, we collect certain information and store it in log files. This information may include but is not limited to, Internet Protocol (IP) addresses, system configuration details, URLs of referring pages, language preferences, and other related data.
- **Cookies and Other Tracking Technologies:** We may use cookies and other tracking technologies to gather information about how you interact with our Websites. This helps us understand and improve your experience. You can manage your cookie preferences by adjusting your browser's privacy settings (consult your browser's help function for more details on cookie controls). Please be aware that disabling cookies may affect the functionality of our Website. For more information, scroll down.
- **API Specifications and Metadata:** When you import or upload your API specifications to our platform, we collect and store this data to generate documentation and enhance the services provided by our platform. This may include endpoint structures, request/response examples, authentication details, and other relevant metadata tied to your API. The information is used solely for the purpose of delivering and improving our services, including generating accurate and comprehensive API documentation. We do not share or use your API data for any other purposes without your explicit consent.

If you contact us directly, we may receive additional information about you such as your name, email address, phone number, the contents of the message and/or attachments you may send us, and any other information you may choose to provide.

## 5. How We Use the Information We Collect?

We use the information we collect for various purposes, including:

- **To Provide, Operate, and Maintain Our Website:** Ensure the proper functioning of our Services, monitor performance, and maintain security.

- **To Improve and Personalize Our Services:** Tailor content, recommendations, and features based on user preferences and interactions to enhance the overall user experience.
- **To Analyze User Interaction:** Gather insights on how users engage with our website, services, and products to make data-driven improvements.
- **To Develop New Products and Features:** Innovate and enhance our services.
- **To Communicate with You:** Send important account updates, provide customer service support, respond to inquiries, share marketing materials (with your consent), and notify you of relevant offers and promotions.
- **To Process Transactions:** Manage and facilitate payments, orders, and other transactions securely and efficiently.
- **To Prevent Fraud and Ensure Security:** Monitor and detect fraudulent activities, unauthorized access, or misuse of our services, and take action to protect our users and the integrity of our platform.
- **To Comply with Legal Obligations:** Fulfill any applicable legal obligations, respond to legal requests, or defend against legal claims.
- **To Conduct Research and Analytics:** Analyze trends, usage, and performance metrics to support product research, business strategy, and decision-making processes.
- **To Enable Social Features:** Facilitate interactions through social media accounts, such as sharing content or logging in via social media platforms (with your permission).
- **To Enforce Our Terms and Policies:** Ensure compliance with our terms of service, privacy policies, and any other agreements we have with users.

## 6. How We Share Your Information?

We may share your information with third parties in the following circumstances:

- **With Service Providers:** We share your information with trusted service providers who assist us in performing functions such as payment processing, data analysis, hosting, customer support, and marketing. These service providers are contractually obligated to handle your data in a secure and confidential manner, in compliance with relevant data protection laws.
- **For Legal Reasons:** We may disclose your information if required to do so by law, regulation, legal process, or governmental request. This includes complying with court orders, responding to legal claims, or enforcing our terms of service and privacy policy. We may also share your information to protect our rights, safety, property, or the safety of others.
- **Social Media Platforms:** If you interact with us through social media (e.g., by logging in using a social media account or sharing content from our platform), the social media platforms may collect and use certain information about you in accordance with their privacy policies. We do not control these platforms and encourage you to review their policies to understand how they handle your data and what privacy controls they offer.

- **Trusted Marketing Partners:** We may share your information with trusted third-party marketing partners who help us deliver relevant marketing content. These partners may use your data to provide you with information, offers, or promotions about products or services that may be of interest to you. You may opt out of marketing communications at any time by following the instructions provided in the communications.
- **In Connection with Business Transfers:** If we are involved in a merger, acquisition, sale of assets, or other business transaction, your information may be transferred as part of that transaction. In such cases, we will notify you of the change in ownership or use of your personal information, as well as any choices you may have regarding your data.
- **With Your Consent:** We may share your information with third parties if you give us explicit consent to do so, for purposes not otherwise covered in this privacy policy.
- **To Enforce Our Terms and Policies:** We may share your information as needed to enforce our terms of service, agreements, or policies, and to protect the security or integrity of our services.

## 7. Use of User-Created Documentation for AI Training

As part of our commitment to improving and advancing our services, We may use publicly accessible documentation created and published by You on our Platform for the purpose of training and refining our artificial intelligence and machine learning models.

For the Privacy Policy, you should include a section specifically addressing the use of user-created public-facing documentation for AI training and model improvement. Here's a draft of what you could include:

**Data Collection and Use:** When You create and publish documentation that is publicly accessible on our Platform, you consent to Theneo's use of such documentation for the following purposes:

- To train and enhance our AI and machine learning models, which includes improving the functionality, performance, and accuracy of our services.
- To develop new features and capabilities that benefit users of the Platform.

**Data Handling and Security:** The data used for AI training will be handled in accordance with our data protection practices. We implement appropriate technical and organizational measures to safeguard your information and ensure its confidentiality. User-created documentation will only be used in aggregated and anonymized forms where possible to further protect individual privacy.

**Rights and Permissions:** By using our Platform, you grant Theneo a worldwide, non-exclusive, royalty-free, and irrevocable right to use your publicly accessible documentation for the purposes outlined above. This use of your documentation does not

require additional consent from you beyond what is provided in these Terms and Conditions and our Privacy Policy unless a separate agreement stipulates otherwise.

**Transparency and Control:** We strive to be transparent about our data practices and are committed to upholding your privacy rights. For more information on how we collect, use, and protect your data, please review our full Privacy Policy.

If you have any questions or concerns about our data practices or how your information is used, please contact us at: [hello@theneo.io](mailto:hello@theneo.io)

## 8. Data Security

We have established administrative, technical, and organizational measures to help prevent unauthorized access, use, or disclosure of your personal information.

Although we are committed to protecting your information and ensuring its confidentiality, we cannot guarantee complete security. Be aware that transmitting information over the internet always carries some risk, and there is a possibility that others might bypass our security measures. Therefore, while we make every effort to safeguard your personal information, we cannot assure or warrant the security and privacy of any information you transmit through our Services or Websites. You assume this risk, so we encourage you to be cautious about the personal information you choose to share

## 9. Jurisdiction-Specific Provisions

### Australia:

If you are a resident of Australia and are dissatisfied with how we handle any complaints made under this Policy, you may contact the Office of the Australian Information Commissioner for further assistance.

### Brazil:

Brazilian residents covered under the Lei Geral de Proteção de Dados Pessoais (“LGPD”) may exercise their rights outlined in Article 18 of the LGPD by contacting our Data Protection Officer at [hello@theneo.io](mailto:hello@theneo.io)

### Canada:

In this Policy, "applicable law" refers to the Federal Personal Information Protection and Electronic Documents Act (PIPEDA), the Personal Information Protection Act, SBC 2003 c 63, in British Columbia, the Personal Information Protection Act, SA 2003 c P-6.5, in Alberta, and the Act Respecting the Protection of Personal Information in the Private Sector,

CQLR c P-39-1 (Quebec Private Sector Act), in Quebec. "Personal Data" includes "personal information" as defined by these laws.

When Theneo collects Personal Data from Canadian (including Quebec) residents, the data is transferred to data centers in the U.S. and may be processed by third parties located outside of Canada.

You have the right to request access or rectification of your Personal Data or withdraw consent for its processing by contacting us at: [hello@theneo.io](mailto:hello@theneo.io)

#### **EEA and UK:**

If you are from the European Economic Area (EEA) or the UK, our legal basis for collecting and using your personal information depends on the type of information collected and the context in which it is collected. Generally, we collect personal information from you in the following matters: (a) when we have your consent, (b) when we need your personal information to fulfill a contract with you (e.g., to provide the Services you have requested), (c) when processing is necessary for our legitimate interests in delivering our Services, or (d) when required by applicable laws to collect, retain, or share such information. In certain cases, we may need to process personal information to protect Your vital interests or those of another individual.

If we process your personal data based on your consent, you have the right to withdraw or decline consent at any time. If we process your data based on our legitimate interests, you have the right to object.

For any questions or additional information about the legal basis for collecting and using your personal information, please contact us at [hello@theneo.io](mailto:hello@theneo.io)

#### **India:**

Once the Digital Personal Data Protection Act (DPDPA) is enacted, we will comply with its requirements. We may rely on "legitimate use" as a legal basis in some cases. You may revoke or provide consent by contacting us at [hello@theneo.io](mailto:hello@theneo.io), and we may require proof of authorization and identity to process such requests. If Aadhaar information is requested for verification, it is voluntary, and alternative identification methods are accepted. For concerns related to data processing in India or to communicate with us in one of India's official languages, please contact our Nodal and Grievance Officer or our Data Protection Officer at [hello@theneo.io](mailto:hello@theneo.io). If your complaint remains unresolved, you may escalate it to the Data Protection Board of India.

#### **Indonesia:**

This Policy complies with Indonesia's Law on Electronic Information and Transactions, Government Regulation on Electronic Systems, and Personal Data Protection (PDP) Law,

effective September 2024. For any questions or complaints, please reach out to our Data protection officer at [hello@theneo.io](mailto:hello@theneo.io).

**Japan:**

In Japan, our processing of Personal Data complies with the Act on the Protection of Personal Information (APPI). When transferring data to jurisdictions not deemed adequate by Japan's Personal Information Protection Commission, we enter into agreements with third parties to ensure equivalent protections. In certain cases, we may rely on "public interest" as a legal basis for processing, such as fraud detection.

**Malaysia:**

For questions or complaints about this Policy, Malaysian residents may contact us at [hello@theneo.io](mailto:hello@theneo.io)

**Singapore:**

This Policy complies with Singapore's Personal Data Protection Act 2012 (PDPA). In some cases, we rely on "deemed consent" as a legal basis when users voluntarily provide their personal data. For inquiries, contact us at [hello@theneo.io](mailto:hello@theneo.io)

**Switzerland:**

The Swiss Federal Act on Data Protection (FADP) governs our processing of data for Swiss residents. To exercise your rights under the FADP, contact us at [hello@theneo.io](mailto:hello@theneo.io). Swiss residents may also have rights under the Swiss-U.S. Data Privacy Framework.

**Thailand:**

Thailand's Personal Data Protection Act 2019 (PDPA) governs our collection and processing of Personal Data. If we rely on certain legal bases (e.g., "legal obligation" or "contractual necessity") and you do not provide Personal Data, we may be unable to lawfully provide our services. For any questions or complaints, contact us at [hello@theneo.io](mailto:hello@theneo.io)

**United States:**

If you are a U.S. consumer, we comply with U.S. privacy laws, including the California Consumer Privacy Act (CCPA) and other state privacy laws. U.S. consumers have rights such as requesting information about collected personal data, opting out of data sales or sharing, and limiting the use of sensitive personal data. To exercise these rights, contact us via the methods described in the "Contact Us" section.

We also honor Global Privacy Control (GPC) opt-out signals. If you have unresolved concerns, you may contact our U.S.-based third-party dispute resolution provider for assistance.

## **10. Data Retention**

We will keep your personal information for as long as needed to operate our Website or deliver our Services. We will also retain and use your information to fulfill our legal obligations, resolve disputes, and enforce our policies. The length of time we retain your information will be based on the type of information collected and its purpose, considering applicable requirements and the need to promptly discard outdated or unused information.

## **11. Your Rights**

If you are registered at Our Website, you can request to receive an exported file of the personal data we hold about you, including any data you have provided to us. You can also request that we erase any personal data we hold about you. This does not include any data we are obliged to keep for administrative, legal, or security purposes.

We would like to make sure you are fully aware of all of your data protection rights. Every user has the right to:

- **Access:** Request copies of your personal data.
- **Rectification:** Request correction of inaccurate or incomplete information.
- **Erasure:** Request deletion of your personal data, subject to certain conditions.
- **Restriction of Processing:** Request restriction of processing under certain conditions.
- **Objection to Processing:** Object to our processing of your data under certain conditions.
- **Data Portability:** Request transfer of your data to another organization or directly to you under certain conditions.

To exercise these rights, please contact us. We have one (1) month to respond to your request.

## **12. Changes to This Privacy Policy**

We may periodically update this Privacy Policy to reflect changes in our practices or legal requirements. Whenever we make significant updates, we will notify you by posting the revised Privacy Policy on our Website. We encourage you to review this Privacy Policy regularly to stay informed about how we are protecting your information.

## **13. Contact Us**

If there are any further questions, queries, concerns, or complaints in relation to this Privacy Policy, please contact us at:

**Theneo Inc.**

**7511 Greenwood Ave North Seattle, WA 98103, United States**

**Phone: +12062228133**

**[hello@theneo.io](mailto:hello@theneo.io)**