

Privacy Policy

Last updated: June 25, 2025

This Privacy Policy (“**Privacy Policy**”) describes how Cicero Technologies, Inc. d/b/a Eudia and its affiliates and subsidiaries (collectively, “**Eudia**,” “**us**,” “**we**,” or “**our**”) collect, use, and disclose your personal information in connection with our website located at www.eudia.com and any other websites we own and operate that link to this Privacy Policy (collectively, the “**Site**”), our related services and offerings, events that we attend or sponsor, our social media pages, and our email, text, and other electronic communications (collectively, and together with the Site, the “**Platform**”), and the choices you have with respect to your personal information.

This Privacy Policy does not apply to personal information that we store or maintain on behalf of our customers, where applicable, such as when they submit personal information to our services for processing. In those cases, our processing is governed by the terms of our contracts with the relevant customer, who is the data controller of the personal information they submit. For more information about a specific customer’s privacy practices, please contact them directly.

We may update this Privacy Policy from time to time. We will notify you of changes by posting the new Privacy Policy on this page and changing the “Last Updated” date at the top of this page. In some cases, such as where required by law, we may notify you about any updates by sending you an email, posting a notice on the Platform about the update, or using other reasonable means. In all cases, your continued use of the Platform following posting of changes constitutes your acceptance of such changes. We encourage you to review this Privacy Policy periodically for any updates.

If you have questions or concerns regarding this Privacy Policy, you may contact Eudia by email at privacy@eudia.com.

This Privacy Policy covers the following topics:

COLLECTION OF PERSONAL INFORMATION

SOURCES OF PERSONAL INFORMATION

USE OF PERSONAL INFORMATION

DISCLOSURE OF PERSONAL INFORMATION

TRANSFER OF PERSONAL INFORMATION

SECURITY

RETENTION OF PERSONAL INFORMATION

YOUR CHOICES

CHILDREN

LINKS TO OTHER WEBSITES AND SERVICES

NOTICE TO CALIFORNIA RESIDENTS

NOTICE TO EUROPEAN RESIDENTS

CONTACT US

COLLECTION OF PERSONAL INFORMATION

Categories of Personal Information Collected. We collect personal information about you in different contexts depending on how you use the Platform. The categories we collect and some examples of the personal information within those categories are described in the table below:

Category of Personal Information	Examples
Individual Identifiers	Contact information , such as first and last name, email address, phone number, mailing address, and social media handle. Online identifiers , such as Internet Protocol (IP) address, device ID, and other unique identifiers. Other identifying information , such as your signature.
Commercial Information	Account information , such as your account details, profile data, or other information that you store in your account, if you create one on the Site. Order and service history , such as records of the products, services, or subscriptions you have purchased or received from us. Transaction and billing data , such as payment amounts and payment methods used to complete transactions, subscription details, or other billing details. Preferences , such as any preferences you set in your account or any marketing or communications preferences. Communications , such as the information associated with your requests or inquiries, including for support, assistance, or account information, or any feedback you provide when you communicate with us.
Internet or Network Activity	Online activity information , such as the website you visited before browsing to the Platform, pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, or duration of access. Device information , such as your computer or mobile device operating system type and version number, wireless carrier, manufacturer and model, browser type, screen resolution, or general location information such as city, state, or geographic area.
Audio, Electronic, Visual, or Similar Information	Customer service call recordings , which we may record for training and quality assurance purposes.
Professional Information	Employer and business information , such as company name, job title, company location and address, email, and phone, and other details we may collect about your business or profession.

Unless we specifically request it, we ask that you not provide us with any sensitive personal information (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background, or trade union membership).

Please note, if you choose not to provide all personal information requested, we may not be able to provide certain services or features of the Platform.

SOURCES OF PERSONAL INFORMATION

We obtain the categories of personal information listed above from the sources described below.

Personal Information You Provide. We collect personal information when you provide it to us, such as when you contact us with questions, express interest in our products or services, register on the Site and create an account, complete a contact form, or otherwise interact with us or the Platform.

Personal Information Obtained from Third Parties. We may receive personal information from third parties, such as our service providers, advertising partners, data analytics partners, distribution partners, event sponsors, publicly available sources, social media platforms, or data licensors/providers. We may merge or combine such personal information with the personal information we collect about you, such as if we enhance our user database information with third party data.

Referrals. Users of the Platform may have the opportunity to refer colleagues or other contacts to us and share their contact information. Please do not provide us with another person's contact information unless you have their permission to do so.

Automatically Collected Personal Information. When you visit or interact with the Platform, your personal information may also be collected automatically. We, our service providers, and our advertising partners may automatically log information about you, your computer, or your device, and your activity over time on our Platform and on other sites and online services, such as the Individual Identifiers or Internet or Network Activity data described in the table above. Like many online services, the following technologies may be used to facilitate some of our automatic data collection:

- **Cookies**, which are text files that websites store on a visitor's device to uniquely identify the visitor's browser or to store information or settings in the browser for the purpose of helping you navigate between pages efficiently, remembering your preferences, enabling functionality, helping us understand user activity and patterns, and facilitating online advertising.
- **Local storage**, which is used to save data on a visitor's device. We may use data from local storage to, for example, turn on web navigation, store multimedia preferences, customize what we show you based on your past interactions with our Platform, remember your preferences, or measure ad effectiveness.

USE OF PERSONAL INFORMATION

Eudia may use personal information for the purposes set forth below and as otherwise described in this Privacy Policy or at the time of collection.

To Provide the Platform. We may use your personal information to provide the Platform and operate our business, such as to:

- create, manage, monitor, and maintain your account on the Platform;
- provide, customize, and operate the Platform and our business;
- provide you with the services you request, as well as maintenance and customer support, including through the use of chatbots or other artificial agents to provide quicker, more efficient responses to your customer service requests;
- process your payments, monitor your subscriptions or orders, or store your information for future transactions;
- monitor and improve your experience on the Platform;
- review and respond to your inquiries and requests;
- send you updates or alerts or contact you for information verification purposes; and
- contact you by phone, email, or other form of communication.

For Research and Development. We may use your information for research and development purposes, including to study and improve the Platform and our business, understand and analyze the usage or transaction trends and preferences of our users, and develop new features, functionality, products, or services.

As part of these activities, we may create aggregated or de-identified data from personal information we collect. We make personal information into de-identified data by removing information that makes the data personally identifiable to you. We may use this de-identified data and share it with third parties for our lawful business purposes, such as when we include summary demographics in our research product offerings. Where we process de-identified personal information, we commit to maintaining and using such information in de-identified form without re-identifying such information (except where re-identification is in accordance with applicable law).

Training AI Systems. We may use your information to train artificial intelligence (AI) systems to develop new features, functionality, products, or services. This enables us to provide more accurate and helpful services to our users over time.

Direct Marketing. We may send you Eudia-related or other direct marketing communications as permitted by law. You may opt-out of our marketing communications as described in the “YOUR CHOICES” section below.

Text Messaging. We may provide text messaging services using SMS or short code technology. For example, users may receive text alerts related to their account on the Platform. For more information about how to opt-out of text messaging services, please see the “YOUR CHOICES” section below or review the applicable messaging service terms.

Interest-Based Advertising. We work with third-party advertising companies and social media companies to help us advertise our business and to display or deliver ads for our products and services to you or others. These companies may use cookies and similar technologies to collect

information about you (including the Individual Identifiers and Internet or Network Activity data described in the table of personal information categories above) over time across our Platform and other sites and services or your interaction with our emails, and use that information to serve ads that they think will interest you. In addition, these companies may use hashed customer lists that we share with them to deliver ads to you and to similar users on their platforms.

Compliance, Fraud Prevention, and Safety. We may use your personal information and disclose it to law enforcement, government authorities, and private parties as we believe necessary or appropriate to: (a) maintain the safety, security, and integrity of our Platform, products and services, business, databases and other technology assets; (b) protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims); (c) audit our internal processes for compliance with legal and contractual requirements and internal policies; (d) enforce the terms and conditions that govern the Platform; and (e) prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft. We will use your personal information as we believe necessary or appropriate to comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities.

With Your Consent. In some cases, we may specifically ask you for your consent to collect, use, or share your personal information, such as when required by law.

DISCLOSURE OF PERSONAL INFORMATION

We may disclose your personal information to the entities and individuals listed below or as otherwise described in this Privacy Policy or at the point of collection.

Related Companies. We may share personal information with our affiliated entities, including parents, subsidiaries, or other related companies.

Service Providers. We share personal information with third parties and individuals who perform functions on our behalf and help us run our business. For example, we work with service providers that help us perform website hosting, maintenance, database management, account security and authentication, cloud storage, web analytics, payment processing, email services, marketing, advertising, and other purposes.

Your Company. We may disclose your personal information to the company associated with your account or subscription, such as when we share reports or other feedback relating to the services we provide to them.

Advertising Partners. We may also share personal information with third parties who we partner with for advertising campaigns or that collect information about your activity on the Platform for the purposes described in the "Interest-Based Advertising" section above.

Law Enforcement, Authorities, and Others. Under certain circumstances, Eudia may be required to disclose your personal information to law enforcement, government authorities, and other parties if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency). Eudia may also disclose your personal information in the good faith belief that

such action is necessary to comply with a legal obligation or for the purposes described above in the section titled “Compliance, Fraud Prevention, and Safety.”

Professional Advisors. We may share your personal information with persons, companies, or professional firms providing Eudia with advice and consulting in accounting, administrative, legal, tax, financial, debt collection, and other matters.

Business Transaction Participants. We may disclose your personal information to third parties in connection with any business transaction (or potential transaction) involving a merger, acquisition, sale of shares or assets, financing, acquisition, consolidation, reorganization, divestiture, or dissolution of all or a portion of our business (including in connection with a bankruptcy or similar proceedings).

TRANSFER OF PERSONAL INFORMATION

Eudia is headquartered in the United States, and we work with service providers in the United States and other countries. Your personal information may be collected, used, and stored in these countries or other locations outside of your home country. Privacy laws in the locations where we handle your personal information may not be as protective as the privacy laws in your home country. By providing your personal information, where applicable law permits, you hereby specifically and expressly consent to such transfer and processing and the collection, use, and disclosure set forth herein or in any applicable terms of service.

Users located in Europe can view more information about cross-border transfers in the section below titled “NOTICE TO EUROPEAN RESIDENTS.”

SECURITY

The security of your personal information is important to us, but please remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your information, we cannot guarantee its absolute security.

If you have created an account with us, Eudia is not responsible for any loss or misuse of your username and password. Always remember that in order to protect your privacy you should not share your username or password with others.

RETENTION OF PERSONAL INFORMATION

We will retain your personal information for as long as necessary to fulfill the purpose of collection, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish and defend legal claims, for fraud prevention purposes, or as long as required to meet our legal obligations. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

YOUR CHOICES

In this section, we describe the rights and choices that may be available to you depending on how you interact with us or use the Platform.

Access, Correct, or Delete Your Account Information. If you have an account with us on the Platform, you may access, modify, or remove certain information saved in your account by making the changes directly in your account or contacting us using the information at the bottom of this Privacy Policy.

Opt-Out of Promotional Email Communications. You may opt out of marketing-related emails you receive from us by following the opt-out or unsubscribe instructions at the bottom of the email, or by contacting us as described below. You may continue to receive service-related and other non-marketing emails.

Opt-Out of Text Messages. We may offer communications via SMS texts or similar technology sent by Eudia or our service providers, such as when we send you text messages for customer service or account-related purposes. You can opt-out of texts by following the instructions for the applicable texting program you enroll in or by emailing us your request and mobile telephone number to the email address provided at the bottom of this Privacy Policy.

Cookies. Most browsers let you remove or stop accepting cookies from the websites you visit. To do this, follow the instructions in your browser's settings. Many browsers accept cookies by default until you change your settings. If you do not accept cookies, however, you may not be able to use all functionality of the Platform and our Site may not work properly. For more information about cookies, including how to see what cookies have been set on your browser and how to manage and delete them, visit www.allaboutcookies.org.

Analytics. The Site uses Google Analytics to help us analyze how the Site is being accessed and used. You can learn more about Google Analytics cookies by clicking [here](#) and about how Google protects your data by clicking [here](#). To opt-out of Google Analytics, you can download and install the Google Analytics Opt-out Browser Add-on, available [here](#).

Advertising Choices. You can limit the use of your information for interest-based advertising by blocking third-party cookies in your browser settings, using browser plug-ins/extensions, and/or using your mobile device settings to limit the use of the advertising ID associated with your mobile device. You can also opt out of interest-based ads from companies participating in the following industry opt-out programs by visiting the linked websites: the Network Advertising Initiative (http://www.networkadvertising.org/managing/opt_out.asp) and the Digital Advertising Alliance (<https://optout.aboutads.info>). Some of the companies we work with may offer their own opt-out mechanisms. For example, you can learn more about how Google uses cookies for advertising purposes by clicking [here](#) and opt-out of ad personalization by Google by clicking [here](#).

Many of the opt-out preferences described in this section must be set on each device and/or browser for which you want them to apply. Please note that some of the advertising companies we work with may not participate in the opt-out mechanisms described above, so even after opting-out, you may still receive interest-based advertisements from other companies. If you opt-out of interest-based advertisements, you will still see advertisements online but they may be less relevant to you.

Do Not Track. Some browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

Declining to Provide Information. We need to collect personal information to provide certain services. If you do not provide the information requested, we may not be able to provide those services.

CHILDREN

The Platform is not intended for use by anyone under the age of 18, and we do not knowingly collect personal information from children or minors.

LINKS TO OTHER WEBSITES AND SERVICES

The Platform may contain links to other websites and online services that are not operated by us. These links are not an endorsement of, or representation that we are affiliated with, any third party. If you click on a third party link, you will be directed to that third party’s site or service. In addition, our content may be included on web pages or online services that are not associated with us. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third party sites or services. Other websites and services follow different rules regarding the collection, use and sharing of your personal information. We encourage you to review the privacy policies of other websites and other online services that you visit or use.

NOTICE TO CALIFORNIA RESIDENTS

This section applies only to California residents. It describes how we collect, use, and share personal information of California residents when we act as a “business” as defined under the California Consumer Privacy Act (“**CCPA**”), and their rights with respect to their personal information. For purposes of this section, “personal information” has the meaning given under the CCPA but does not include information exempted from the CCPA. In some cases, we may provide a different privacy notice to certain categories of California residents, in which case that notice will apply instead of this section.

Categories of Personal Information We Collect, and the Purposes of Collection and Use. We describe the categories of personal information we collect/have collected about you in the preceding 12 months, and the categories of sources from which we collect/have collected such personal information, in the section above called “COLLECTION OF PERSONAL INFORMATION.” The business and commercial purposes for which we collect and share these categories of personal information are described in the section above called “USE OF PERSONAL INFORMATION.”

To the extent that we may collect sensitive personal information (as defined under the CCPA), we only use or disclose it for purposes permitted under the CCPA (e.g., to provide the Platform, detect security incidents and prevent fraud, or to verify and maintain the quality of the Platform). We do not collect or use sensitive personal information for the purpose of inferring characteristics about California residents.

Personal Information Disclosed for Business Purposes. We disclose (and in the preceding 12 months may have disclosed) each of the categories of personal information listed above with our service providers and the other parties listed above in the section titled “DISCLOSURE OF PERSONAL INFORMATION.”

Your California Privacy Rights. As a California resident, in addition to the choices described elsewhere in this Privacy Policy, you have the rights listed below. Please note, these rights are not absolute, and, in some cases, we may not be able to respond to your request, such as when a legal exemption applies or if we are not able to verify your identity.

- **Right to Know/Access.** You can request the following information about how we have collected and used your personal information:
 - the categories of personal information we collected;
 - the categories of sources from which we collected personal information;
 - the business or commercial purpose for collecting, selling, or sharing (as applicable) that personal information;
 - the categories of third parties with whom we disclose personal information; and
 - a copy of the personal information that we collected about you.
- **Right to Delete.** You can request that we delete the personal information we collected from you.
- **Right to Correct.** You can request that we correct inaccurate personal information that we maintain about you.
- **Right to Opt-Out of Sales/Sharing.** If we “sell” or “share” your personal information, you can opt-out.
- **Right to Nondiscrimination.** You are entitled to exercise the rights described above without receiving discriminatory treatment.

How to Exercise Your Rights. You may exercise the rights described above as follows:

- **Know/Access, Delete, or Correct.** You may exercise these California privacy rights by emailing us at privacy@eudia.com.
- **Right to opt-out “sales” or “sharing”/ “targeted advertising” or “profiling” relating to the use of cookies.** You can request to opt-out out your personal information from “sales” or “sharing”/ “targeted advertising” relating to the automatic collection of data on the Site by cookies and similar technologies by clicking [Cookie Icon] at the bottom of the Site and changing your cookie preferences or broadcasting the Global Privacy Control (GPC) signal. Note that due to technological limitations, if you visit our Site from a different computer or device, or clear cookies on your browser that store your preferences, you will need to return to this screen to select your preferences or rebroadcast the GPC signal.
- **Opt-Out of other Sales/Sharing.** You can request to opt-out of the “sale” or “sharing” of your personal information by emailing us at privacy@eudia.com or clicking here: Your Privacy Choices.

If you direct us not to sell/share your personal information, we will consider it a request pursuant to California’s “Shine the Light” law to stop sharing your personal information covered by that law with third parties for their direct marketing purposes.

We reserve the right to confirm your California residence to process your requests and will need to confirm your identity to process your requests to exercise your right to know/access, delete, and correct. This is a security measure to, for example, help ensure we do not disclose information to a person who is not entitled to receive it. The identity verification process may vary depending on how you submit your request.

Consistent with California law, you may designate an authorized agent to make a request on your behalf. If you do so, we may require proof of your identification, the authorized agent’s proof of identification, and any other information that we may request in order to verify the request, including evidence of valid permission for the authorized agent to act on your behalf. We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee or decline to comply with your request if your request is clearly unfounded, repetitive, or excessive.

We try to respond to all legitimate requests to know/access, delete, and correct within 45 days of your request. Occasionally it may take us longer than 45 days to respond, for instance if your request is particularly complex or you have made a number of requests. In this case, we will notify you of the delay, and may continue to update you regarding the progress of our response.

NOTICE TO EUROPEAN RESIDENTS

The information provided in this section applies only to individuals in the European Economic Area and the United Kingdom (collectively, “**Europe**”). Except as otherwise specified, references to “personal information” in this Privacy Policy are equivalent to “personal data” governed by European data protection legislation.

Controller. The controller of your personal information covered by this Privacy Policy for purposes of European data protection legislation is Cicero Technologies, Inc. d/b/a Eudia.

Legal Bases for Processing. The legal bases of our processing of your personal information as described in this Privacy Policy will depend on the type of personal information and the specific context in which we process it. However, the legal bases we typically rely on are set out in the table below. We rely on our legitimate interests as our legal basis only where those interests are not overridden by the impact on you (unless we have your consent or our processing is otherwise required or permitted by law). If you have questions about the legal basis of how we process your personal information, contact us as provided at the end of this Privacy Policy.

Processing Purpose (as described above in the section “USE OF PERSONAL INFORMATION”)	Legal Basis
To Provide the Platform	Processing is necessary to perform the contract governing our operation of the Platform, or to take steps that you request prior to engaging our services. Where we cannot process your personal information as required to operate the Platform on the grounds of contractual

	necessity, we process your personal information for this purpose based on our legitimate interests as further described in this Privacy Policy.
Research and Development	Processing is based on our legitimate interests in performing research and development as described in this Privacy Policy.
Training AI System	Processing is based on our legitimate interests in training our AI systems as described in this Privacy Policy.
Direct Marketing	Processing is based on your consent where that consent is required by applicable law. Where we rely on your consent you have the right to withdraw it any time in the manner indicated when you consented or via the relevant portion of the Platform.
To Display Advertisements	Where such consent is not required by applicable law, we process your personal information for this purpose based on our legitimate interests in promoting our business and providing you with tailored, relevant content.
Compliance, Fraud Prevention, and Safety	Processing is necessary to comply with our legal obligations or based on our legitimate interests in protecting our or others' rights, privacy, safety, or property.
With Your Consent	Processing is based on your consent. Where we rely on your consent you have the right to withdraw it any time in the manner indicated when you consent or via the relevant portion of the Platform.

Use for New Purposes. We may use your personal information for reasons not described in this Privacy Policy where permitted by law and the reason is compatible with the purpose for which we collected it. If we need to use your personal information for an unrelated purpose, we will notify you and explain the applicable legal basis.

Your Rights. European data protection laws may give you certain rights regarding your personal information. You may ask us to take the following actions in relation to your personal information that we hold:

- **Access.** Provide you with information about our processing of your personal information and give you access to your personal information.
- **Correct.** Update or correct inaccuracies in your personal information.
- **Delete.** Delete your personal information.
- **Port.** Transfer a machine-readable copy of your personal information to you or a third party of your choice.
- **Restrict.** Restrict the processing of your personal information.
- **Object.** Object to our reliance on our legitimate interests as the basis of our processing of your personal information that impacts your rights.

You may submit these requests by emailing privacy@eudia.com. We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions. If you would like to submit a complaint about our use of your personal information or our response to your requests regarding your personal information, you may contact

us or submit a complaint to the data protection regulator in your jurisdiction. In the European Economic Area, you can find your data protection regulator [here](#). In the United Kingdom, you can find your data protection regulator [here](#).

Cross-Border Data Transfer. If we transfer your personal information to a country outside of Europe such that we are required to apply additional safeguards to your personal information under European data protection laws, we will do so. Please contact us at privacy@eudia.com for further information about any such transfers or the specific safeguards applied.

CONTACT US

If you have any questions or concerns about our Privacy Policy or any other privacy or security issue, please contact us at privacy@eudia.com.