LOTI AI INC.

Privacy Policy

Effective Date: September 24, 2026

This Privacy Policy applies to:

- Loti AI Inc. and our affiliates ("Loti," "Company," "we," "us," "our").
- Loti's website at https://lotiai.com (the "Website").
- Loti's products and services (the "Service").

This Privacy Policy applies when You interact with us through our Website and Service. It also applies anywhere it is linked. It does not apply to third-party websites, mobile applications, or services that may link to the Website or Service or be linked to from the Website or Service. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party websites, applications, or services. Please review the privacy policies of those third parties directly to understand their privacy practices.

For purposes of this Privacy Policy:

- **Likeness** means the Subscriber's biometric face and voice signatures that are each abstract, non-geometric, numerical representations of the Subscriber's face or voice that are associated with each Subscriber's identifying information.
- **Service** means Loti Software as a Service (SaaS) services, including but not limited to artificial intelligence (AI) software for detecting use of Subscriber's likeness in internet content, including unauthorized, manipulated and fabricated media such as deepfakes and AI-generated images.
- **Subscriber** refers to an individual who has signed and agreed to Loti's Terms of Service and Biometric Data Privacy Policy and is an authorized user of the Service.
- **You** refers to the individual accessing or using the Website or Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Website or Service, as applicable.

Subscribers only: By using the Service, You agree to the collection and use of information in accordance with this Privacy Policy. Please see our separate Biometric Data Policy here for information about the collection, use and disclosure of Your biometric data by the Service.

Information We Collect

We collect information from You directly, from the devices You use to interact with us, and from third parties. We may combine information from the Website and Service together and with other information we obtain from our business records. We may use and share information that we aggregate (compile to create statistics that cannot identify a particular individual) or de-identify

(strip information of all unique identifiers such that it cannot be linked to a particular individual) at our discretion.

Information you give us

While using our Service, we may ask You to provide us with certain information that can be used to contact or identify You, such as:

- Email address
- First name and last name
- Phone number
- Address, State, Province, ZIP/Postal code, City
- Audiovisual information, such as audio recordings, photographs, and video

In order to use the Service, you must provide us with Your biometric data so we may track the unauthorized uses of Your voice and image across the internet and pursue their removal at your direction. Please see our Biometric Data Policy here.

You may also provide the following information to us directly:

- Payment information, including credit card information
- Information contained in your communications to us, including through the support widget on our Website
- Any information or data you provide by interacting in our online forums and chatrooms, or by commenting on content posted on our Website or Service, which are also visible to other users of our Website and Service
- Information you provide when you request a demo or contact us through our Website (see "Demo Requests and Inquiries" below)
- Your use of our Website and Service
- Any other information you submit to us

Information we collect automatically

We and service providers working on our behalf may use log files, cookies, or other digital tracking technologies to collect the following information from the device You use to interact with our Website and Service. We also create records when You make a purchase or otherwise interact with the Service.

- **Device information**, such as Internet Protocol address (e.g. IP address), device identifiers, browser type, browser version, the pages of our Website and Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data
- **Analytical information**, including details about Your interaction with our Website and Service, and electronic newsletters
- **Diagnostic information**, including web traffic logs

- **Business record information**, including records of your purchases of products and services and use of our Website and Service

The following providers collect information from Your device when You visit our Website:

Provider	What it does	Privacy information
Webflow	Hosts our Website and sets a security cookie needed for the Website to work.	https://webflow.com/legal/privacy
Cloudflare	Protects our forms from automated spam by checking whether a visitor is human.	https://www.cloudflare.com/privacypolicy/
Freshworks	Provides the support widget on our Website.	https://www.freshworks.com/privacy/
Content delivery networks	Deliver the code and files that make up our Website, and receive Your IP address when they do.	—

Demo Requests and Inquiries

When You request a demo or contact us through our Website, we collect the information You enter: Your name, email address, company or organization, the options You select about who You are and what You need help with, the name of anyone You tell us You represent, and any notes You add.

Please share only what we need to respond. Don't include details of incidents, or the names of people other than someone You represent. We'll discuss anything further with You directly. If You do include information about other people that we don't need to respond to Your request, we may delete it.

How we use it. We use this information to respond to Your request, arrange a conversation, keep a record of our contact with You, and understand what kinds of people and organizations are getting in touch. We process it because we have a legitimate interest in responding to inquiries, and because it is a step You have asked us to take before entering into an agreement.

Who receives it. Your inquiry is handled by the following service providers on our behalf:

Provider	What it does
Webflow	Hosts our Website and receives form submissions
Clarify	Our customer relationship management system, where we keep the record of Your inquiry
Slack	Notifies our team that a new inquiry has arrived. The notification does not include the contents of Your notes

Google Workspace	Our email, used to alert our team to new inquiries and to reply to You
Calendly	Lets You book a meeting time with us when our team sends You a booking link
Twilio SendGrid	Sends our marketing emails and keeps our list of people who have opted out

Marketing. If You tick "Don't send me marketing emails," we won't send You marketing. We will still reply to the request You made. You can unsubscribe from marketing at any time using the link in any marketing email.

How long we keep it. We keep inquiries that lead to an ongoing relationship for as long as that relationship lasts. We delete other inquiries after 180 days from the last correspondence.

Tracking Technologies and Cookies

We use cookies and similar tracking technologies to track the activity on our Website and Service and to store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service. The technologies we use may include:

- **Cookies.** A cookie is a small file placed on Your device. You can instruct Your browser to refuse all cookies or to indicate when a cookie is being sent. However, if You do not accept cookies, You may not be able to use some parts of our Website and Service. Unless you have adjusted Your browser setting so that it will refuse cookies, our Website and Service may use cookies.
- **Web beacons.** Certain sections of our Website and Service and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be "Persistent" or "Session" in duration. Persistent cookies remain on Your personal computer or mobile device when You go offline, while session cookies are deleted as soon as You close Your web browser. Cookies are also either first-party or third-party (the “provenance”). First-party cookies are put on Your device directly by us, while third-party cookies are placed on Your device by a third-party (such as an analytics provider).

We use the following types of cookies:

Type	Duration	Provenance	Purpose
Strictly Necessary / Essential	Persistent and session	First-party	These cookies are essential to provide You with services available through the Website, such as keeping the Website secure.

Information we collect from other sources

We may collect information about You from service providers, such as third-party vendors engaged to monitor and analyze the use of our Service, for payment processing, or to otherwise provide the Website and Service to You.

How We Use Your Information

We may use any of the information we collect for the following purposes:

- **To provide and maintain our Service**, including to monitor the usage of our Service.
- **To improve our Service:** to improve and grow our Service, including to develop new products and services and understand how our Website and Service are being used, our customer base and purchasing trends, and the effectiveness of our marketing.
- **To manage Your Account:** to manage Your registration as a user of the Service. The information You provide can give You access to different functionalities of the Service that are available to You as a registered user.
- **For the performance of a contract:** the development, compliance and undertaking of the purchase contract for the products, items or services You have purchased or of any other contract with us through the Service.
- **To contact You:** to contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- **To provide You** with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or inquired about unless You have opted not to receive such information.
- **To manage Your requests:** to attend to and manage Your requests to us, including demo requests and inquiries.
- **For business transfers:** we may use Your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Us about our Service users is among the assets transferred.
- **Security:** to protect and secure our Website and Service, assets, network, and business operations, and to detect, investigate, and prevent theft, unauthorized use, or abuse of the Website or Service and other activities that may violate our policies or be fraudulent or illegal.
- **Legal compliance:** to comply with legal process, such as warrants, subpoenas, court orders, and lawful regulatory or law enforcement requests and to comply with applicable legal and regulatory requirements.

Notwithstanding the above, we use Your biometric data solely for purposes of providing the Service, as described in our Biometric Data Policy available here.

How We Share Your Information

We may share any of the information we collect in the following situations:

- **With service providers:** We may share Your information with vendors we engage to perform specific business functions on our behalf, such as to host our Website, handle inquiries, monitor and analyze the use of our Service, process payments, and contact You. The providers involved in our Website and in handling inquiries are listed above. These vendors are obligated by contract to use information that we share only for the purpose of providing the requested service.
- **For business transfers:** We may share or transfer Your information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of our business to another company. We will provide notice before Your personal information is transferred and becomes subject to a different privacy policy.
- **With affiliates:** We may share Your information with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include our parent company and any other subsidiaries, joint venture partners or other companies that we control or that are under common control with us.
- **With business partners:** We may share Your information with our business partners to offer You certain products, services or promotions.
- **To Government entities/law enforcement:** Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).
- **For legal purposes:** The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:
  - Comply with a legal obligation
  - Protect and defend the rights or property of the Company
  - Prevent or investigate possible wrongdoing in connection with the Service
  - Protect the personal safety of Users of the Service or the public
  - Protect against legal liability
- **With Your consent:** We may disclose Your information for any other purpose with Your consent.

We do not sell Your personal information, and we do not share it with third parties for advertising.

Notwithstanding the above, we share Your biometric data only as described in our Biometric Data Policy available here.

Other Important Information

Your Account

Please visit Your account page to update your account information.

Data Retention

We will retain Your information as long as we have a legitimate business need for it, including to the extent necessary to comply with our legal obligations (for example, if we are required to retain information to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies. Inquiries made through our Website are kept as described in "Demo Requests and Inquiries" above.

We will also retain usage data for internal analysis purposes. Usage data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

We will retain Your biometric data as described in our Biometric Data Policy available here.

Cross-Border Data Transfer

Your information is processed at our operating offices and in any other places where the parties involved in the processing are located, including the United States and other countries. This means that Your information may be transferred to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of Your jurisdiction. Any such transfers will comply with safeguards as required by relevant law.

Data Security

The security of Your information is important to us, but 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.

Email Marketing

We may use Your information to contact You with newsletters, marketing or promotional materials and other information that may be of interest to You. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send, by ticking "Don't send me marketing emails" on our demo request form, or by contacting us.

Opting out of marketing does not stop us replying to a request You have made, such as a demo request.

Payments

We may provide paid products and/or services within the Service. In that case, we may use third-party services for payment processing (e.g. payment processors).

We will not store or collect Your payment card details. That information is provided directly to our third-party payment processors whose use of Your personal information is governed by their privacy policy and adhere to the PCI-DSS requirements to help ensure the secure handling of payment information.

Cookie Choices

Our Website uses only cookies that are needed for it to work, such as security cookies set by our hosting provider. You can disable cookies in Your browser or mobile device settings, but some parts of our Website and Service may not work properly.

EEA, Switzerland, and UK Privacy Disclosures

We process “personal data” as that term is defined in the European Union’s General Data Protection Regulation (GDPR). The controller of Your personal data for purposes of the GDPR is Loti AI Inc. at 100 N Howard St #6321, Spokane, WA 99201.

Legal Basis for Processing Personal Data

We may process personal data under the following conditions:

- **Consent:** You have given Your consent for processing personal data for one or more specific purposes. We process Your biometric data only with Your explicit consent, unless an exception applies. You have the right to withdraw Your consent to future processing at any time, but please note that if You withdraw Your consent, we may not be able to provide You with access to certain specific functionalities of the Website or Service.
- **Performance of a contract:** Provision of personal data is necessary for the performance of an agreement with You and/or for any pre-contractual obligations thereof.
- **Legal obligations:** Processing personal data is necessary for compliance with a legal obligation to which we are subject.
- **Vital interests:** Processing personal data is necessary in order to protect Your vital interests or of another natural person.
- **Legitimate interests:** Processing personal data is necessary for the purposes of the legitimate business interests pursued by us or another third party, such as responding to inquiries.

Your Rights Under the GDPR

If You are within the EU, Switzerland, or the U.K., you have the right to:

- **Access and Portability.** Request access to personal data we hold about you or request transmission of your data to a third party.
- **Correction.** Request that we rectify inaccurate or incomplete personal data we store about You.
- **Erasure:** Request that we erase personal data when such data is no longer necessary for the purpose for which it was collected, when You withdraw consent and no other legal basis for processing exists, or when You believe that Your fundamental rights to data privacy and protection outweigh our legitimate interest in continuing the processing.
- **Object to processing.** Object to processing of your personal data based on our legitimate interests or for direct marketing (including profiling). We will no longer process the data unless there are compelling legitimate grounds for our processing that override Your interests, rights, and freedoms, or for the purpose of asserting, exercising, or defending legal claims.

- **Restrict processing.** Request that we restrict our processing of personal data if there is a dispute about the accuracy of the data; if the processing is unlawful; if the processing is no longer necessary for the purpose for which it was collected but is needed by You for the establishment, exercise or defense of legal claims; or if Your request to object to processing is pending evaluation.
- **Transfers.** Obtain information about and a copy of the safeguards we use to transfer personal data across borders.

You may exercise these rights by contacting us as described below. Please note that we may ask You to verify Your identity before responding to such requests. Whenever made possible, you can also access, update or request deletion of Your personal data directly within Your account settings section. If you are unable to perform these actions yourself, please contact us to assist You.

You also have the right to complain to a data protection authority about our collection and use of Your personal data. For more information, please contact Your local data protection authority.

California Privacy Disclosures

California "Shine the Light" Law

California residents with an established business relationship with us are entitled to request and obtain certain information regarding our disclosure, if any, of certain categories of personal information to third parties for the third parties' direct marketing purposes in the preceding calendar year. Please contact us to obtain this information.

California Privacy Rights for Minor Users

California residents under the age of 18 who are registered users of online sites, services or applications may request and obtain removal of content or information they have publicly posted. To request removal of such data, please contact us and provide the email address associated with Your account.

Be aware that Your request does not guarantee complete or comprehensive removal of content or information posted online and that the law may not permit or require removal in certain circumstances.

California Consumer Privacy Act

The California Consumer Privacy Act (CCPA) provides California residents with rights to receive certain disclosures regarding the collection, use, and disclosure of information about them, as well as rights to know/access, correct, delete, and limit disclosure of personal information. You have the right to be free from discrimination based on Your exercise of Your CCPA rights. If we collect personal information subject to the CCPA, that information, our practices, and your rights are described below. The information provided in this section applies only to California residents and supplements the information contained in our Privacy Policy.

Notice of Collection

You have the right to receive notice of certain information about our data collection, use, and disclosure. The following table summarizes the categories of personal information we collect; the categories of sources of that information; whether we disclose, sell, or share that information to service providers or third parties, respectively; and the criteria we use to determine the retention period for such information. The table also summarizes the categories of "sensitive" personal information that we collect, the purpose for which such information is used, and whether we sell or share such information. The categories we use to describe personal information are those enumerated in the CCPA. We collect this personal information for the purposes described above in "How We Use Your Information."

Category	Examples	Source	We disclose to	We sell to / share with
Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.	You	Service providers	Not sold/shared
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	A name, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information.	You	Service providers	Not sold/shared
Commercial information	Transaction information, billing and payment records, purchase history.	You	Service providers	Not sold/shared
Biometric information	Voice signatures, face signatures.	You	Service providers	Not sold/shared
Internet or other similar network activity	Interaction with our Website or Service.	You	Service providers	Not sold/shared

We determine the retention period for each of the categories of personal information listed above based on (1) the length of time we need to retain the information to achieve the business or commercial purpose for which it was obtained, (2) any legal or regulatory requirements applicable to such information, (3) internal operational needs, and (4) any need for the information based on any actual or anticipated investigation or litigation.

Entities to whom we disclose information for business purposes are service providers, which are companies that we engage to conduct activities on our behalf. We restrict service providers from using personal information for any purpose that is not related to our engagement.

We do not sell or share personal information, as those terms are defined by the CCPA. Under the CCPA, a business "sells" personal information when it discloses the information to a third party for monetary or other benefit, and a business "shares" personal information when it discloses the information to a third party for purposes of cross-context behavioral advertising.

We do not knowingly collect personal information from minors under the age of 16 through our Service, although certain third party websites that we link to may do so. These third-party websites have their own terms of use and privacy policies and we encourage parents and legal guardians to monitor their children's Internet usage and instruct their children to never provide information on other websites without their permission. We do not sell or share the personal information of individuals under the age of 16.

Your Rights Under the CCPA

- **The right to know and request access to and correction or deletion of personal information.** You have the right to request access to personal information collected about You and information regarding the source of that personal information, the purposes for which we collect it, and the service providers to whom we disclose it. You also have the right to request in certain circumstances that we correct personal information that we have collected about You and to delete personal information that we have collected directly from You. Please contact us to exercise these rights as described below.

Exercising Your CCPA Rights

In order to exercise any of Your rights under the CCPA as a California resident, You can contact Us:

- By email: support@goloti.com
- By telephone: (888) 970-5684

If You are submitting an email to exercise the right to know and access, correct, or delete, Your request to Us must:

- Provide sufficient information that allows us to reasonably verify You are the person about whom We collected personal information or an authorized representative
- Describe Your request with sufficient detail that allows us to properly understand, evaluate, and respond to it
- If you are an authorized agent, provide proof that the consumer gave you signed permission to submit the request

We cannot respond to Your request to know, access, correct, or delete, or provide You with the required information if We cannot:

- Verify Your identity or authority to make the request
- And confirm that the personal information relates to You

We will not use personal information we collect in connection with verifying or responding to Your request for any purpose other than responding to Your request.

We may have a reason under the law why we do not have to comply with Your request, or why we may comply with it in a more limited way than You anticipated. If we do, we will explain that to You in our response.

"Do Not Track" Policy

We do not sell or share personal information, so there is nothing for browser privacy signals such as Global Privacy Control or "Do Not Track" to opt You out of on our Website.

Children’s Privacy

The Service is intended for users who are 13 years old and older. We do not knowingly collect information from children. If You are a parent or guardian and You are aware that Your child has provided us with personal information, please contact us. If we become aware that we have collected personal information from anyone under the age of 13 without verification of parental consent, we take steps to remove that information from our servers.

If we need to rely on consent as a legal basis for processing Your information and Your country requires consent from a parent, we may require Your parent’s consent before we collect and use that information.

Changes to this Privacy Policy

We may update our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page.

We will let You know via email and/or a prominent notice on Our Service, prior to the change becoming effective and update the "Effective Date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If you have any questions about this Privacy Policy, You can contact us by email at support@goloti.com.

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