

**PRIVACY POLICY**  
**[Last modified: July 23, 2025]**

**INTRODUCTION**

Trinity Audio Ltd. ("**us**", "**our**", "**we**" or "**Company**") is the owner and developer of proprietary technology and integration intended to convert articles and similar content to audio ("**Technology**"). The technology is implemented by Company's business partners in their websites or other digital assets ("**Business Partners**" and "**Digital Assets**" respectively), enabling their Digital Assets' end user ("**Users**") to listen to the content available therein. The Company also allows for third party advertisers ("**Advertisers**") to provide advertisements ("**Ads**") through its Technology (collectively with the Technology, "**Services**").

This privacy policy ("**Privacy Policy**") governs our privacy and data collection practices with respect to the data we collect from individuals who access and use our website available at: [trinityaudio.ai](https://trinityaudio.ai) ("**Visitors**"), our Business Partners who use and register for our Services and their Users interacting with the Technology. Each of the Business Partners, Users, and Visitors shall also be referred to herein as "**you**".

This Privacy Policy will explain what information we may collect from our Visitors, Business Partners and their Users, how such information may be used or shared with others, how we safeguard it and how each of the aforementioned individuals may exercise their rights related to their Personal Data (as such term is defined below) in accordance with applicable data protection laws including, but not limited to, the EU General Data Protection Regulation ("**GDPR**") and the California Consumer Privacy Act ("**CCPA**"). We highly encourage you to read the Privacy Policy carefully and use it to make informed decisions before you access our Website or use any of our Services.

**If you are a California resident, the CCPA may apply to you as well. Please review our [CCPA Privacy Notice](#) to learn more.**

**For additional privacy information for certain United States residents** - please review the "Additional Notice for US Residents" paragraph of this Privacy Policy.

This Privacy Policy will include, but is not limited to, the following information:

- (i) Our lawful basis for processing your Personal Data;
- (ii) What type of data we collect and how we use such data;
- (iii) Cookies and how we collect your data;
- (iv) With whom we share your data and for what purpose;
- (v) Your privacy rights;
- (vi) Our data retention practices;
- (vii) Our direct marketing practices;
- (viii) How we protect your data;
- (ix) International transfer of your data;

- (x) Children;
- (xi) Additional Notice for US Residents
- (xii) How to contact us;

## WHAT TYPE OF DATA DO WE COLLECT?

If you are a Visitor, User or Business Partner, we may collect one or both of the following types of data from you when you use or access our website, the Services or when you interact with the Technology, as applicable.

The first type of data is aggregated, non-personal, non-identifiable information pertaining to your use of the website or interaction with the Technology ("**Non-personal Data**"). We are not aware of the identity of the individual from which the Non-personal Data is collected. NonPersonal Data may include your aggregated usage information and technical information transmitted by your device, including certain software and hardware information about your device (e.g., the device you use, the type of browser and operating system your device uses, language preferences, access times and the website's domain name from which you accessed the Services, etc.), in order to enhance the functionality of the Services and for security and functionality purposes. We may also collect information about your activity on the Services (e.g., clicks, ads shown, etc.).

The second type of information is individually identifiable information, namely information that identifies an individual or may with reasonable effort identify an individual ("**Personal Data**").

For the avoidance of doubt, if we combine Personal Data with Non-personal Data, the combined data will be treated as Personal Data as long as the data types remain combined.

We act as a **Processor** of a User's Personal Data that we process on behalf of our Business Partners. We are considered to be the **Controller** of the Personal Data we collect from our Business Partners and Visitors.

**The types of data that we collect as well as our reasons for processing such data are specified in the tables below.**

### Data We Collect from Business Partners and Visitors:

| DATA SET                                                                                                                                                                                                                                                                                                       | PURPOSE AND OPERATIONS                                                                                                                                                                                                                                 | LAWFUL BASIS                                                                                                                                  |
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| <b>Data We Collect From Business Partners And Visitors</b>                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                        |                                                                                                                                               |
| <b>Data Provided Voluntarily:</b><br><br>If you voluntarily contact us in any manner, whether via our contact form on our website, request a demo, via email, etc., you may be asked to provide us with your contact information such as your full name and email address as well as your Company name and job | We will use this data solely for the purpose of responding to your inquiries and to provide you with the support or information you requested. We will retain our correspondence with you for as long as we find necessary, subject to applicable law. | We process such Contact Information subject to our legitimate interest.<br><br>We may keep such correspondence if we are legally required to. |

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| <p><b>Business Partner's Registration:</b></p> <p>If you wish to partner with us and integrate the Technology within your Digital Assets you will be request to register and create an account. During the registration you will be requested to provide your contact details such as your name, email address, phone number and company name.</p> <p>You may also provide us with your email address through registration or other means of communications if you choose to download our Technology through third- parties' plugin or app marketplace.</p> | <p>We will use this data to provide the Services and designate your account. Your contact details will be used in order to send you needed information related to our Services and our business engagement (<i>e.g.</i>, send you a welcome message, notify you regarding any updates to our Services, send inquiries regarding your use of our Technology and Services for example where we detect you have failed to complete the download or otherwise reached the offered cap, send applicable invoices, etc.) and additional occasional communications and updates related to the Services, as well as provide you with tips related to our Services, and promotional and marketing emails. We may also use the information in order to verify your identity, including by send you a text message for password verification purposes.</p> <p>We use third-party payment processor to process the payments in consideration for our Services. We will not obtain your payment details other than as needed for validation.</p> <p>purposes (<i>e.g.</i>, 4 digits, BIN, expiry date). The processing of your payment details will be subject to the applicable third-party processor's policies</p> | <p>Processed for the purpose of fulfilling our contract obligations with you.</p>                                                                                                                                       |
| <p><b>Newsletter &amp; Marketing List Subscription:</b></p> <p>If you voluntarily subscribe to our newsletter through our Website, or otherwise agree to receive our updates and content, you may be requested to provide us with your</p>                                                                                                                                                                                                                                                                                                                  | <p>We use this data solely in order to provide you with the content that you requested to receive. The Company uses MailChimp for its email marketing services. Please review MailChimp's privacy policy here: <a href="https://mailchimp.com/legal/privacy/">https://mailchimp.com/legal/privacy/</a></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <p>We process such information based on your request and consent. You can unsubscribe at any time using the unsubscribe option within the body of the applicable email correspondence or by contacting us directly.</p> |

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| contact information such as your name, email address and company name.                                                                                                                                                                                                                                                                                            | for more information.                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                  |
| <p><b>IP and Technical Data:</b></p> <p>When you access our website or interact with our Services, we may collect certain online identifiers (e.g. your IP address) as well as technical Non-Personal Data (e.g. the type of operating system, type of browser, device type, access time and date, directing URL and your approximate geographical location).</p> | <p>We use this data for our legitimate interests of: (i) operating, providing, maintaining, protecting, managing, customizing and improving our website and the way in which we offer it; (ii) enhancing your experience; (iii) auditing and tracking usage statistics and traffic flow; and (iv) protecting the security of our website.</p> <p>We will obtain your consent, if we are required to do so in accordance with applicable law when we use third party cookies on our website.</p> | <p>process the Online Identifiers and Usage Data through third party cookies based on consent which is provided through the cookie notice and consent manager. You may withdraw consent at any time by using the cookie preference settings available on our website. First party cookies are strictly necessary and processing of Online Identifiers is subject to our legitimate interest.</p> |
| <b><u>Data We Collect From End-Users</u></b>                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                  |

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| <p><b>Online Identifiers &amp; Technical Usage Personal Data:</b></p> <p>The Company may collect information regarding a User's interaction with the Services. Such information may include Online Identifiers such as the User's IP address, Advertising ID and IDFA. We may also assign a unique ID to your browser. The Company may also collect technical Data, such as, the type of operating system used, the type of browser, device type, access time and date, certain browsing data (e.g. directing URL) and the User's approximate geographical location</p> | <p>We use this data for (i) operating, providing, maintaining, protecting, managing, customizing and improving our Services and the way in which we offer them as well as. In some cases, to provide Users with personalized Ads; (ii) enhancing your experience; and (iii) auditing and tracking usage statistics and traffic flow as well as calculating payments related to the Services, we provide to Business Partners.</p> <p>Where required under applicable law, we will require our Business Partner to obtain your consent to collect such data and share it with us.</p> <p>Note that, we use Google Ad Manager to operate our advertising campaigns. Google may use and retain certain types of data subject to its policies. Additional information can be found <a href="#">HERE</a>.</p> | <p>We process the End User Data upon consent provided through the consent string, TCF string.</p> <p>Otherwise, the aggregated data is used in our legitimate interest in providing the Service, and conducting research for improving the Service, all as detailed in the Legitimate Interest Claim below.</p> <p>In certain aspects of our Service, we act as the “data processor” or “service provider”, in which we will rely on our publishers to obtain the necessary lawful basis for processing the end user personal data</p> |
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Please note that the actual processing operation per each purpose of use and lawful basis detailed in the table above may differ. Such processing operation usually includes a set of operations made by automated means, such as collection, storage, use, disclosure by transmission, erasure, or destruction. The transfer of personal data to third-party countries, as further detailed in the Data Transfer Section, is based on the same lawful basis as stipulated in the table above.

In addition, we may use certain Personal Data to prevent potentially prohibited or illegal activities, fraud, misappropriation, infringements, identity thefts, and any other misuse of the Services and to enforce the Terms, as well as to protect the security or integrity of our databases and the Services, and to take precautions against legal liability. Such processing is based on our legitimate interests.

**OUR LEGITIMATE INTEREST CLAIM (DISCLOSURE AS REQUIRED BY TCF 2.2):**

In addition to the information provided above, we would like to further clarify the legitimate interest grounds under which we may process certain categories of End User Data, in accordance with the requirements of the Transparency and Consent Framework (TCF) v2.2. While the majority of our data processing activities—especially those related to delivering personalized, cross-contextual advertising experiences—are conducted based on your consent (as outlined in the consent table above), there are specific instances where we rely on legitimate interest as our legal basis under Article 6(1)(f) of the GDPR. Specifically, we may process limited types of Personal Data, including Online Identifiers (such as IP address, cookie ID, or device ID), for purposes such as collecting and storing your consent and privacy preferences, ensuring the secure and functional delivery of advertisements, conducting measurement and analytics to improve our services, and maintaining the technical integrity and efficiency of our platform. This processing is essential for enabling us, our publishers, and our advertising partners to meet compliance obligations under the accountability principles set forth in Articles 5(2) and 24 of the GDPR. Without this foundational processing, we would be unable to provide publishers and advertisers with the tools needed to respect user privacy choices or uphold service quality.

## **HOW WE COLLECT DATA**

Depending on the nature of your interaction with the website or the Services, the abovementioned data may be collected as follows:

- Voluntarily - In the event you choose to provide us with information, e.g., when you contact us or if you are a Business Partner and you choose to share other information with use via your use of the Services.
- Automatically - Your data may be collected automatically including via cookies (as explained below) and other similar tracking technologies.

We will ask for your consent to collect Personal Data and offer you the choice to opt-out of such collection if we are required to do so in accordance with applicable law.

## **COOKIES**

We or our third-party affiliates (including Advertisers) may use cookies and other similar tracking technologies or methods of web and mobile analysis to gather, store, and track certain information related to your access of, activity and interaction with the Technology and website, as applicable.

A "cookie" is a small piece of information that a website assigns to your device while you access such website. Cookies are very helpful and may be used for a variety of different purposes. These purposes include, among other things, allowing you to navigate between pages efficiently, enabling automatic activation of certain features, remembering your preferences and making the interaction between you and the Services quicker, easier and smoother. Cookies are also used to help customize your experience and for advertising purposes (including personalized advertising). You can find out more information about cookies at [www.allaboutcookies.org](http://www.allaboutcookies.org).

In general, there are several types of cookies that may be used on our website or in our website and Services including the following:

- **Essential, Functionality, Operation & Security Cookies.** These cookies are essential for enabling user movement around the website, for the website and Technology, as applicable, to function properly, and for security purposes (i.e., used to authenticate users, prevent fraudulent use, and protect user data from unauthorized parties). This category of cookies either cannot be disabled, or if disabled, certain features of the website or Services may not work.
- **Analytical, Measurement & Performance Cookies.** These cookies are used to collect information about how our website and Services are being used, in order to improve our Services and the way we offer them, as well assess performance of the content and the way it is displayed on our website. These cookies enable us, for example, to assess the number of users who have viewed a certain page as well as their country of origin.
- **Targeting & Advertising Cookies.** These cookies are set by our third-party service providers, business partners, or Advertisers, as applicable. They may be to build a profile of your interests and show you personalized content and advertisements. They work by uniquely identifying your browser and device.

**The third parties' cookies used in our website are as follows:**

| Cookie           | Purpose                                       | Privacy Policy and Opt-Out                                                                                                                                                                                            |
|------------------|-----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Google Analytics | Analytical, Measurement & Performance Cookies | <a href="http://www.google.com/policies/privacy/partners">www.google.com/policies/privacy/partners</a><br><a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a>             |
| HubSpot          | Functionality & Operation                     | <a href="https://legal.hubspot.com/privacy-policy? ga=2.48898406.1547561739.1580054069-1042704558.1573974857">https://legal.hubspot.com/privacy-policy? ga=2.48898406.1547561739.1580054069-1042704558.1573974857</a> |
| MailChimp        | Functionality & Operation                     | <a href="https://mailchimp.com/legal/privacy/">https://mailchimp.com/legal/privacy/</a>                                                                                                                               |

**The third parties' cookies used in our Technology are as follows:**

| Cookie           | Purpose                                       | Privacy Policy and Opt-Out                                                                                                                                                                                                             |
|------------------|-----------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Google Analytics | Analytical, Measurement & Performance Cookies | <a href="http://www.google.com/policies/privacy/partners">www.google.com/policies/privacy/partners</a><br><a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a>                              |
| Adswizz          | Targeting & Advertising Cookies               | <a href="https://www.adswizz.com/our-privacy-policy/">https://www.adswizz.com/our-privacy-policy/</a><br><a href="https://www.adswizz.com/cookie-policy/">https://www.adswizz.com/cookie-policy/</a>                                   |
| Triton           | Targeting & Advertising Cookies               | <a href="https://www.tritondigital.com/website-privacy-policy">https://www.tritondigital.com/website-privacy-policy</a><br><a href="https://www.tritondigital.com/privacy-policies">https://www.tritondigital.com/privacy-policies</a> |
| Targetspot       | Targeting & Advertising Cookies               | <a href="https://www.targetspot.com/privacy-policy/">https://www.targetspot.com/privacy-policy/</a>                                                                                                                                    |
| ID5              | Targeting & Advertising Cookies               | <a href="https://id5-sync.com/privacy/">https://id5-sync.com/privacy/</a>                                                                                                                                                              |

In addition to the above, our Technology may include cookies placed by Advertisers, and will include Company's cookies required for functionality and operation.

#### **Additional Tracking Tools**

Our website, and our partners website may enables third-party companies to serve ads, collect pseudonymous personal data and/or use tracking technologies and are hereby providing you with a privacy notice and opt-out choice as required under privacy and data protection laws. These tracking technologies are designed to help recognize your computer or device and collect information about your web surfing activity including your activities on this website. Please keep in mind that browser settings designed to block cookies may have no effect on such techniques. When you visit or enter your email address (either to log in, to sign up for a newsletter, or otherwise) on our website, we may share personal data or other information that we collect from you, such as your email (in hashed, pseudonymous form), IP address, and/or information about your browser or operating system with these companies, acting as controllers, and these companies use this information to create a pseudonymous ID for the purpose of recognizing you on your devices. This ID does not contain any of your identifiable personal data. We may place this ID in our first-party cookie or use a partner that places a third-party cookie and allows it to be used for online and cross-context advertising. This ID may be sold/shared by us or on our behalf with our advertising partners and other third-party advertising companies globally for the purpose of enabling interest-based content, profiling and/or targeted advertising throughout your online experience (e.g. web, email, connected devices, in-app, etc). One such third-party company is ID5.

Detailed information on ID5's data processing activities in connection with this ID and ID5's opt-out is available [here](#) and in ID5's platform privacy policy here: <https://id5.io/platform-privacy-policy>. You have the right to opt-out of ID5's sale or sharing of your data at any time.

#### **Cookies Opt-Out:**

You can change your cookies settings at any time to control cookies placement through limiting or forbidding the website under which we provide the Services to place cookies on your device and to disable unwanted cookies already stored on your device, by changing your browser's privacy preferences (please visit the help pages of your web browser). Please note, however, that if you disable cookies or refuse to accept them, you might not be able to use all of the features we offer or some of the features may not function properly. You may not be able to store your preferences and some of our pages might not display properly. We may, at our sole discretion, delete old cookies after a certain time which no activity had occurred from a user.

Your web browser allows you to manage the cookies and your choices. The configuration for each browser is different. You may find more information about managing cookies on different web browsers below:

| Browser           | Relevant Link                                                                                                                                                                                                 |
|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Google Chrome     | <a href="https://support.google.com/chrome/answer/95647?hl=en">https://support.google.com/chrome/answer/95647?hl=en</a> ;                                                                                     |
| Firefox           | <a href="https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences">https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences</a>                         |
| Opera             | <a href="https://help.opera.com/en/latest/security-and-privacy/">https://help.opera.com/en/latest/security-and-privacy/</a> ;                                                                                 |
| Internet Explorer | <a href="https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies">https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies</a> ; |
| Safari            | <a href="https://support.apple.com/en-il/guide/safari/sfri11471/mac">https://support.apple.com/en-il/guide/safari/sfri11471/mac</a>                                                                           |
| Edge              | <a href="https://support.microsoft.com/en-us/help/4027947/windows-delete-cookies">https://support.microsoft.com/en-us/help/4027947/windows-delete-cookies</a>                                                 |

You may also opt out of certain Advertisers' cookies and browser-enabled, interest-based advertising at the Network Advertising Initiative's ("NAI") website- [NAI consumer opt-out and](#) the Digital Advertising Alliance's ("DAA") website- DAA opt-out page. Or the European Interactive Digital Advertising Alliance ("EDAA") website [Your Online Choices page](#).

Our Business Partners may also provide ways for you to opt out from or limit their collection of information from and about you for example ID5 which allow you to opt out through this [link](#). Please refer to the Business Partner's privacy policies. **Please note, however, that we are not responsible for the privacy practices of our Business Partners, and other third parties.**

## WHO DO WE SHARE DATA WITH AND WHY?

We do **not** share your Personal Data with third parties except as specifically mentioned herein:

- **Third Party service providers** - we may disclose your Personal Data to third parties that perform services on our behalf (e.g. tracking, servers, service functionality and support, marketing, etc.). These entities may be located in a different jurisdiction than you and are prohibited from using your Personal Data for any purposes other than providing us with the requested services;
- **Third Party Rights** - we may share your Personal Data, solely to the extent needed to prevent harm to the rights (including intellectual property rights and other legal rights), property or safety of us, our Visitors, Business Partners and their Users, yourself or any other third party.
- **Policy Enforcement** - we may share your Personal Data, solely to the extent needed in order to enforce our policies including investigations of potential violations thereof, to establish or exercise our rights to defend against legal claims or to detect, prevent, or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues;
- **Legal Requirement** - we may disclose or share your Personal Data, solely to the extent needed to comply with any applicable law, regulation, legal process or governmental request (i.e., to comply with a court injunction, etc.) or for the purpose of collaborating with law enforcement agencies; or
- **Affiliated Companies and Corporate Transaction**- we may share your Personal Data with a parent company, subsidiaries, joint ventures, or other companies under common control with the Company ("**Affiliated Companies**") solely if and when applicable or necessary. In addition, we may share information, in the event of a corporate transaction (e.g. sale, merger, consolidation, etc.), provided however, that our Affiliated Companies or acquiring company will be subject to the obligations detailed herein with respect to your Personal Data.
- **Online Identifiers** - we may share Online Identifiers with our Business Partners and advertising partners for the purpose of the Services, as well as to detect fraud and calculate payments.

## THIRD-PARTY COLLECTION OF DATA

Our Privacy Policy only addresses the use and disclosure of Personal Data that we collect from you. To the extent that you disclose your Personal Data to other parties via the Services (e.g., by clicking on a link to any other website or location) or via other websites throughout the internet, different rules may apply to their use or disclosure of the Personal Data you disclose to them and your Personal Data will be subject to that third-party's privacy policy.

You acknowledge that we are not responsible for third party's privacy practice related to or integrated with our Technology, including Business Partner and Advertisers, and that this Privacy Policy does not apply to any such third-parties' privacy practices. We strongly advise you to learn

about the privacy practices of each website that you may visit before providing any Personal Data to such website.

## YOUR PRIVACY RIGHTS

We acknowledge that different people have different privacy concerns and preferences. Our goal is to be clear about what information we collect so that you can make meaningful choices about how it is used. We allow you to exercise certain choices, rights, and controls in connection with your information. Depending on your relationship with us, your jurisdiction and the applicable data protection laws that apply to you, you have the right to control and request certain limitations or rights to be executed.

Under applicable privacy protection laws, individuals have certain rights and controls regarding their Personal Data we process and maintain. Depending on your relationship with us, your jurisdiction and the privacy laws that apply to the processing of your Personal Data, the principal rights might include:

- **Right to be informed** – you have the right to be provided with information regarding our Personal Data collection and privacy practices. All is detailed under this Privacy Policy. If you have any additional questions, please contact us at: [privacy@trinityaudio.ai](mailto:privacy@trinityaudio.ai)
- **Right to access/inspect your Personal Data** - you have the right to ask us to confirm whether or not we collect and use your Personal Data, and if so, you have the right to know which Personal Data we specifically hold about you ask for a copy of your Personal Data or access it;
- **Right to correct/rectify your Personal Data** - you have the right to ask us to correct or update any of your Personal Data that is incorrect, after verifying the accuracy of the data first, taking into account the nature of the processing and the purposes (or request deletion for inaccurate Personal Data).
- **Right to erase your Personal Data (the right “to be forgotten”)** - you have the right to request the erasure of certain Personal Data, if specific conditions are satisfied, for example, if you think we no longer need to use it for the purpose we collected it from you, in case the process of your Personal Data was based on your consent, where we have used it unlawfully, or where we are subject to a legal obligation to erase your Personal Data. any request for such erasure will be subject to our rights and obligations under applicable law (e.g., legitimate interests such as record keeping with regards to our engagements, completing transactions, providing a good or service that you requested, taking actions reasonably anticipated within the context of our ongoing business relationship with you, fulfilling the terms of a written warranty, detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, or prosecuting those responsible for such activities; debugging products to identify and repair errors that impair existing intended functionality; exercising right provided for by law; engaging in public or peer-reviewed scientific, historical, or statistical research in the public interest, etc.). You are not required to create an account with us to submit a deletion request;
- **Right to restrict our processing of your Personal Data** - you have the right to ask us to restrict or limit the purpose for which we process your Personal Data in certain circumstances and where certain conditions are satisfied (such as where the accuracy of the Personal Data is contested by you, for a period enabling us to verify the accuracy of the Personal Data; where

the processing is unlawful and you oppose the erasure of the Personal Data; where we no longer need the Personal Data for the purposes of the processing).;

- **Right to object to how we use your Personal Data** - you can object to any use of your Personal Data which we have justified by our legitimate interest if you believe your fundamental rights and freedoms to data protection outweigh our legitimate interest in using the information;
- **Right to withdraw consent/opt-out** - when the lawful basis for processing your Personal Data is your consent, you may withdraw such consent at any time. You have the right to opt-out from Direct Marketing, if applicable, by unsubscribing through the email received. We do not profile you in a manner that has a significant effect on you or other individuals, therefore there isn't an opt-out option.
- **Data portability right** - you have the right to ask us to provide a copy of your Personal Data in a portable format and, to the extent technically feasible, readily usable format that allows you to transmit the Personal Data to another entity without hindrance. We will select the format in which we provide your copy;
- **Right to appeal or lodge a complaint** - If we decline to take action on your request, we will inform you without undue delay as required under applicable laws. The notification will include a justification for declining to take action and instructions on how you may appeal, if applicable. Under the GDPR you have the right to lodge a complaint with the applicable Data Protection Authority in the EU or the Information Commissioner in the UK.

For California Residents, please further review our [CCPA Notice](#), and for US residents, please further see the *"Additional Notice for US Residents"* paragraph below - to learn more about your rights under applicable US law.

Please note that, you may have different rights than those which we listed above depending on the applicable privacy protection laws in your jurisdiction.

If you wish to exercise any or all of the above rights, please fill out the Privacy Rights Request ("PRR") form available [HERE](#), and send it to our **privacy team** at: [privacy@trinityaudio.ai](mailto:privacy@trinityaudio.ai).

Please feel free to contact our privacy team if you wish to receive more information or you would like to raise a complaint with respect to how we may have handled your Personal Data.

If you are not satisfied with our response or believe we are collecting or processing your Personal Data not in accordance with the applicable data protection laws in your jurisdiction, you may also have the right to submit a complaint with the applicable data protection authority in your jurisdiction.

## **DATA RETENTION**

We retain the information we collect for as long as needed to provide the Services and to comply with our legal obligations, resolve disputes and enforce our agreements (unless you instruct us otherwise).

We may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion.

## **DIRECT MARKETING**

We may send our newsletter to our Business Partners who have registered to receive it. You can remove your Personal Data from our mailing list and stop receiving promotional communications from us by following the unsubscribe link located at the bottom of each communication or by emailing us at: [info@trinityaudio.ai](mailto:info@trinityaudio.ai).

Please note that we will still reserve the right to send you service-related communications, including service announcements and administrative messages that relate either to your account or to your transactions with the Services, even after you have chosen to unsubscribe from receiving our newsletter. You will only be able to opt out of receiving such messages by terminating and deleting your account with us. If you wish to delete your account, please contact us at the email address listed above. It is important that you are also aware, that we will still need to retain some of your Personal Data as required under applicable law or for the legitimate purpose of our business, even after you have chosen to delete your account.

## **HOW DO WE PROTECT YOUR DATA?**

We take great care in implementing and maintaining the security of the Services and your data. We employ physical, technical and administrative security measures that we believe comply with applicable laws and are in line with industry standards. We have instituted a variety of procedures and policies to ensure the safety of your data, and prevent unauthorized use of any such data. Although we take reasonable steps to safeguard information, we cannot be responsible for the acts of those who gain unauthorized access or abuse the Services, and we make no warranty, express, implied or otherwise, that we will prevent such access.

If you feel that your privacy was not treated in accordance with our Privacy Policy, or if any person attempted to abuse the Services or acted in an inappropriate manner, please contact us directly at: [privacy@trinityaudio.ai](mailto:privacy@trinityaudio.ai). Additionally, we will make a reasonable effort to notify you and the appropriate authorities (if required by applicable law) in the event that we discover a security incident related to your Personal Data.

## **DATA STORAGE**

The Company currently uses Amazon Web Services (AWS) as a cloud and storage service provider. AWS's terms of service are available here: <https://aws.amazon.com/service-terms/> and its privacy policy is available here: <https://aws.amazon.com/privacy/>.

## **INTERNATIONAL TRANSFER**

The Company provides Services worldwide and therefore, it may be necessary for us to transfer data, including Personal Data, to countries outside of your jurisdiction, including outside European Economic Area ("EEA"), where applicable. In these instances, we will take steps to ensure that a similar level of protection is given to your Personal Data, including through adequate contractual

measures, as shall be required under applicable laws.

## **CHILDREN**

The website and Services are not directed or meant to be used by children (the phrase "child" shall mean as such term is defined under applicable law or an individual that is less than 16 years old). If you are under 16 years old, you should not access the website, use the Services, or provide any Personal Data to us.

We will immediately discard any Personal Data that we discover has been shared with us by a child. Please contact us immediately at: [privacy@trinityaudio.ai](mailto:privacy@trinityaudio.ai) if you have any reason to believe that a child has shared any Personal Data with us.

## **AMENDMENTS**

We may revise this Privacy Policy from time to time, in our sole discretion. The revised Privacy Policy will go into effect immediately upon its implementation on our website. The last revision date will be reflected in the "Last modified" heading located at the top of the Privacy Policy. We will make a reasonable effort to notify you in the event of any material changes to our privacy practices. We encourage you to review this Privacy Policy regularly for any changes so that you can continue to stay up-to-date with all of our current privacy practices.

## **ADDITIONAL NOTICE FOR US RESIDENTS**

Residents of certain U.S. states (depending on the applicable state law, acting in an individual or household context and not in a commercial or employment context or as a representative of business), including Colorado, Connecticut, Virginia, and Utah, may have additional rights under applicable privacy laws and be entitled to additional disclosures.

"**Personal Data**" under applicable US privacy laws, generally means any information that is linked or reasonably linkable to an identified or identifiable individual (and usually does **not** include publicly available information that is lawfully made available from government records, or that a consumer has otherwise made available to the public; de-identified or aggregated consumer information; or information excluded from the states laws scope, such as: HIPAA, GBPA, non-profit entities, etc.)

"**Sensitive Data**" means data revealing racial or ethnic origin, religious beliefs, mental or physical health condition or diagnosis, sex life, sexual orientation, citizenship, or immigration status; The processing of genetic or biometric data for the purpose of uniquely identifying an individual; Personal Data collected from a known child; Precise geolocation data.

We are required to provide you with a clear and accessible privacy notice that includes the categories of Personal Data processed, purpose of processing, instructions for exercising consumer rights and appealing decisions, categories of Personal Data shared with third parties, categories of third parties with whom data is shared, and any sale of data or targeted advertising.

**Categories of Personal Data & Categories of third parties with whom Personal Data is shared:**

Under the paragraph “**Data We Collect and Purpose of Collection and Use**” of this Privacy Policy, we describe our collection and processing of Personal Data, the categories of Personal Data that are collecting and processing, and the purposes for which Personal Data is processed, stored or used.

Additionally, under the paragraph “**Sharing Data with Third Parties**” of this Privacy Policy, we detail and disclose the categories of third parties we share Personal Data with for business purposes. We will not collect additional categories of Personal Data or use the Personal Data we collected for a materially different, unrelated, or incompatible purpose without obtaining your consent.

#### **“Sale” of Personal Data:**

Under US privacy laws, in principal, the term “sale” is referring to disclosing or making available Personal Data to a third-party in exchange for monetary or other valuable consideration, including for targeted advertising purposes. We do not “sell” information as most people would commonly understand that term, we do not, and will not, disclose your Personal Data in direct exchange for money or some other form of payment however, subject to the definition of the term “Sale” under US privacy laws, we may “sell” the following categories of Personal Data when we use cookies or other third-party advertising services:

- Identifiers – online identifiers such as IP and Cookie ID;
- Internet and electronic network activity information – such as your engagement with our Website and ads.
- Geolocation data - derived from IP (country level).

#### **Consumer Rights:**

Residents of certain U.S. states, including Colorado, Connecticut, Virginia, and Utah, may have additional rights under applicable privacy laws, subject to certain limitations, which may include:

- **Access** - the right to confirm whether we are processing their Personal Data and to obtain a copy of their Personal Data in a portable and, to the extent technically feasible, readily usable format.
- **Delete** - the right to delete their Personal Data provided to or obtained by us.
- **Correct** - the right to correct inaccuracies in their Personal Data, taking into account the nature and purposes of the processing of the Personal Data.
- **Opt-Out** - to opt out of certain types of processing, including: (i) to opt out of the “sale” of their Personal Data; (ii) to opt out of targeted advertising by us; and (iii) to opt out of any processing of Personal Data for purposes of making decisions that produce legal or similarly significant effects.

The paragraph “**Your Rights Under Privacy Protection Laws**” provides additional information regarding your principal rights.

#### **Exercising Your Privacy Rights:**

You may submit a request to exercise most of your privacy rights under U.S. state privacy laws by contacting us at: [privacy@trinityaudio.ai](mailto:privacy@trinityaudio.ai)

When you submit a request, we will take steps to verify your identity and your request by matching the information provided by you with the information we have in our records. In some cases, we may request additional information to verify your identity, or where necessary to process your request. If we are unable to verify your identity after a good faith attempt, we may deny the request and, if so, will explain the basis for denial and how to remedy any deficiencies, where applicable.

To exercise your right to opt-out of the “sale”, you may use the cookies preference management tool on our Website to change your preferences and opt-out of cookies.

Authorized agents may initiate a request on behalf of another individual by contacting us at [privacy@trinityaudio.ai](mailto:privacy@trinityaudio.ai); authorized agents will be required to provide proof of their authorization and we may also require that the relevant consumer directly verify their identity and the authority of the authorized agent.

If we decline to take action on your request, we shall so inform you without undue delay, within the timeframe set out under applicable law. Our notification will include a justification for declining to take action and instructions on how you may appeal. Within the timeframe set out under applicable law of our receipt of your appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied, you may submit a complaint to the applicable authority or Attorney General of your jurisdiction (including - Colorado AG at <https://coag.gov/file-complaint/>; Connecticut Attorney General at: <https://www.dir.ct.gov/ag/complaint/> or (860) 808-5318; Virginia Attorney General at <https://www.oag.state.va.us/consumercomplaintform>).

## **CONTACT US**

Please contact us if you have any questions regarding this Privacy Policy. You may contact us by sending an email to our privacy team at: [privacy@trinityaudio.ai](mailto:privacy@trinityaudio.ai).