

Privacy policy

Neptune Labs, Inc. hereinafter referred to as "Neptune Labs" or the "Company", is committed to protecting the privacy of your information. In order to ensure safety of and respect for your rights, in particular the right to privacy, Neptune Labs introduces the following policy and clarifies the rules for use, collection and processing of personal data.

In personal data processing, Neptune Labs abide by the following guidelines, complying with at least one personal data processing basis.

1. Data Controller

Your personal data is controlled by Neptune Labs, Inc., 2100 Geng Road, Suite 210, Palo Alto, CA 94303, United States of America.

2. Rules and legal basis

Neptune Labs hereby informs you that your personal data will, at all times, be:

- processed lawfully, reliably and transparently;
- collected for specific, explicit and legitimate purposes, and not further processed in a manner inconsistent with those purposes;
- adequate, relevant and limited to what is required for the purposes, i.e. data minimization;
- corrected and updated as required;
- kept in a form enabling identification of the Data Subject for a period which shall not be longer than required for the purposes for which the data is processed;

- processed in a manner ensuring adequate safety of personal data: protection against unauthorized or illegal processing and accidental loss, destruction or damage with the application of adequate technical and organizational means.

Neptune Labs processes personal data in compliance with the law on following legal basis:

- the Data Subject has expressed consent to the processing of their personal data for one or multiple specific purposes;
- processing is necessary for the performance of a contract to which the Data Subject is a party or in order to take steps at the request of the Data Subject prior to entering into a contract;
- processing is necessary for compliance with a legal obligation to which the Controller is subject;
- processing is necessary for the purposes of the legitimate interests pursued by a Controller, except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data.

3. Web Sites Covered

This Privacy Statement covers the information practices of neptune.ai. It also covers any other subdomains of neptune.ai. Collectively these are referred to as Neptune Labs's "sites."

4. Information Collected

Neptune Labs offers a variety of services that are collectively referred to as the "Services." Neptune Labs collects information from individuals who visit the

Company's Web sites ("Visitors") and individuals who register to use the Services ("Customers").

When expressing an interest in obtaining additional information about the Services or registering to use the Services, Neptune Labs requires you to provide the Company with personal contact information, such as name, company name, address, phone number, and email address ("Required Contact Information"). When purchasing the Services, Neptune Labs requires you to provide the Company with financial qualification and billing information, such as billing name and address, credit card number, and the number of employees within the organization that will be using the Services ("Billing Information"). Neptune Labs may also ask you to provide additional information, such as company annual revenues, number of employees, or industry ("Optional Information"). Neptune Labs might also ask you to complete surveys from time to time ("Optional Surveys").

Required Contact Information, Billing Information, Optional Information and Optional Surveys are referred to collectively as "Users Personal Information."

As you navigate the Company's Web sites, Neptune Labs may also collect information through the use of commonly-used information-gathering tools, such as cookies and Web beacons ("Web Sites Navigational Information").

Web Sites Navigational Information includes standard information from your Web browser (such as browser type and browser language), your Internet Protocol ("IP") address, and the actions you take on the Company's Web sites (such as the Web pages viewed and the links clicked). In addition, we may use third-party services, such as Google Analytics, Heap, HotJar or Mixpanel, that collect, monitor and analyze this type of information in order to increase our

Service's functionality. These third-parties may use cookies to help us analyze how our users are using the Service and they have their own Privacy Policies addressing how they use such information.

- Google Analytics

- o Google Analytics service is provided by Google Inc.
- o You can opt-out from Google Analytics service from using your information by installing the Google Analytics Opt-out Browser tool: <https://tools.google.com/dlpage/gaoptout>.
- o For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://www.google.com/policies/privacy>.
- Heap Analytics
 - o Heap Analytics service is provided by Heap Inc.
 - o For more information on the privacy practices of Heap, please visit the Heap Analytics web page: <https://heapanalytics.com/privacy>.
 - o For more information on what type of information Heap collects, please visit the Terms of Use page of Heap: <https://heapanalytics.com/terms>.
- HotJar
 - o HotJar service is provided by Hotjar Ltd.
 - o We use Hotjar in order to better understand our users' needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behavior and their devices (in particular device's IP address (captured and stored only in anonymized form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), preferred language used to display our website). Hotjar stores this information in a pseudonymized user profile. Neither Hotjar nor

we will ever use this information to identify individual users or to match it with further data on an individual user.

- o For more information on the privacy practices of HotJar, please visit the HotJar web page: <https://www.hotjar.com/legal/policies/privacy>.
- o You can opt-out to the creation of a user profile, Hotjar's storing of data about your usage of our site and Hotjar's use of tracking cookies on other websites by following this opt-out link.
- Mixpanel
 - o Mixpanel is provided by Mixpanel Inc.
 - o You can prevent Mixpanel from using your information for analytics purposes by opting-out. To opt-out of Mixpanel service, please visit this page: <https://www.mixpanel.com/optout>.
 - o For more information on what type of information Mixpanel collects, please visit the Terms of Use page of Mixpanel: <https://www.mixpanel.com/terms>.
- Intercom
 - o Intercom is provided by Intercom, Inc
 - o By using Intercom on Neptune website you acknowledge and agree on our Terms of Services as well as on the Intercom Terms and Policies.

For more information on what type of information Intercom collects please visit Intercom Terms and Policies:

<https://www.intercom.com/terms-and-policies#terms>

5. Use of Information Collected

The Company uses Neptune's Users Personal Information to perform the services requested. For example, if you fill out a "Contact us" Web form, the Company will use the information provided to contact you about your interest in the Services.

The Company may also use Neptune's Users Personal Information for marketing purposes. For example, the Company may use information you provide to contact you to further discuss your interest in the Services and to send you information regarding the Company and its partners, such as information about promotions or events.

Neptune Labs uses credit card information solely to check the financial qualifications of prospective Customers and to collect payment for the Services.

Neptune Labs uses Web Sites Navigational Information to operate and improve the Company's Web sites. The Company may also use Web Sites Navigational Information alone or in combination with Neptune's Users Personal Information to provide personalized information about the Company.

The Company uses Neptune's Users Personal Information to reply to requests for a demo. On that basis, our experts will provide you with a personalized introduction to our platform.

6. Web Sites Navigational Information

Neptune Labs uses commonly-used information-gathering tools, such as cookies and Web beacons, to collect information as you navigate the Company's Web sites ("Web Sites Navigational Information"). This section describes the types of Web Sites Navigational Information that may be collected on the Company's Web sites and how this information may be used.

Automated decision-making

Your personal data will not be processed by automated means, in particular by profiling.

7. Personal data storage period

Your personal data storage period will depend on the purpose of their processing. Your personal data storage period is calculated based on the following criteria:

- laws which may obligate Neptune Labs to store data for a specific period of time;
- period which is required to protect the Data Controller's interests;
- period required by Neptune Labs to provide services;
- period for which the consent has been granted.

a. Cookies

Neptune Labs uses cookies to make interactions with the Company's Web sites easy and meaningful. When you visit the Company's Web sites, Neptune Lab's servers send a cookie to your computer. Standing alone, cookies do not personally identify you. They merely recognize your Web browser. Unless you choose to identify yourself to Neptune Labs, either by responding to a promotional offer, opening an account, or filling out a Web form (such as a "Contact Me"), you remain anonymous to the Company. Neptune Labs uses cookies that are session-based and persistent-based. Session cookies exist only during one session. They disappear from your computer when you close your browser software or turn off your computer. Persistent cookies remain on your computer after you close your browser or turn off your computer.

If you have chosen to identify yourself to Neptune Labs, the Company uses session cookies containing encrypted information to allow the Company to uniquely identify you. Each time you log into the Services, a session cookie containing an encrypted, unique identifier that is tied to your account is placed in your browser. These session cookies allow the Company to uniquely identify you when you are logged into the

Services and to process your online transactions and requests. Session cookies are required to use the Services.

Neptune Labs uses persistent cookies that only the Company can read and use to identify browsers that have previously visited the Company's Web sites. When you purchase the Services or provide the Company with personal information, a unique identifier is assigned to you. This unique identifier is associated with a persistent cookie that the Company places on your Web browser. The Company is especially careful about the security and confidentiality of the information stored in persistent cookies. If you disable your Web browser's ability to accept cookies, you will be able to navigate the Company's Web sites, but you will not be able to successfully use the Services.

Neptune Labs may use information from session and persistent cookies in combination with Neptune's Users Personal Information to provide you with information about the Company and the Services.

b. Web Beacons

Neptune Labs uses Web beacons alone or in conjunction with cookies to compile information about Customers and Visitors' usage of the Company's Web sites and interaction with emails from the Company. Web beacons are clear electronic images that can recognize certain types of information on your computer, such as cookies, when you viewed a particular Websites tied

to the Web beacon, and a description of a Websites tied to the Web beacon. For example, Neptune Labs may place Web beacons in marketing emails that notify the Company when you click on a link in the email that directs you to one of the Company's Web sites. Neptune Labs uses Web beacons to operate and improve the Company's Web sites and email communications. Neptune Labs may use information from Web beacons in combination with Neptune's Users Personal Information to provide you with information about the Company and the Services.

c. IP Addresses

When you visit Neptune Lab's Web sites, the Company collects your Internet Protocol ("IP") addresses to track and aggregate non-personal information. For example, Neptune Labs uses IP addresses to monitor the regions from which Customers and Visitors navigate the Company's Web sites.

d. Third Party Cookies

From time-to-time, Neptune Labs may engage third parties, like Facebook or Google, to track and analyze usage and volume statistical information from individuals who visit the Company's Web sites. Neptune Labs may also use other third-party cookies to track the performance of Company advertisements. Neptune Labs may also contract with third-party advertising networks that collect IP addresses and other Web Sites Navigational Information on the Company's Web sites and emails and on third-party Web sites. Ad networks follow your online activities over time by collecting Web Sites Navigational Information through automated means, including through the use of cookies. They use this information to provide advertisements about products and services tailored to your interests. You may see these advertisements on other Web sites. This process also helps us manage and track the effectiveness of our marketing efforts.

- Facebook remarketing service.
 - Facebook remarketing service is provided by Facebook Inc.
 - You can learn more about interest-based advertising from Facebook by visiting this page: <https://www.facebook.com/help/164968693837950>.
 - To opt-out from Facebook's interest-based ads follow these instructions from Facebook: <https://www.facebook.com/help/568137493302217>.

- o Facebook adheres to the Self-Regulatory Principles for Online Behavioral Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the Digital Advertising Alliance in the USA <http://www.aboutads.info/choices/>, the Digital Advertising Alliance of Canada in Canada <http://youradchoices.ca/> or the European Interactive Digital Advertising Alliance in Europe <http://www.youronlinechoices.eu/>, or opt-out using your mobile device settings.
- o For more information on the privacy practices of Facebook, please visit Facebook's Data Policy: <https://www.facebook.com/privacy/explanation>
- Google remarketing.
 - o Google AdWords remarketing service is provided by Google Inc.
 - o You can opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the Google Ads Settings page: <http://www.google.com/settings/ads>
 - o Google also recommends installing the Google Analytics Opt-out Browser Add-on: <https://tools.google.com/dlpage/gaoptout>, for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.
 - o For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <http://www.google.com/intl/en/policies/privacy/>.

8. Public Forums, Refer a Friend, and Customer Testimonials, Community Forum

Neptune Labs may provide bulletin boards, blogs, or chat rooms on the Company's Web sites. Any personal information you choose to submit in such a forum may be read, collected, or used by others who visit these forums, and may be used to send you

unsolicited messages. Neptune Labs is not responsible for the personal information you choose to submit in these forums.

Customers and Visitors may elect to use the Company's referral program to inform friends about the Company's Web sites. When using the referral program, the Company requests the friend's name and email address. Neptune Labs will automatically send the friend a one-time email inviting him or her to visit the Company's Web sites.

Neptune Labs may post a list of Customers and testimonials on the Company's Web sites that contain information such as Customer names and titles. Neptune Labs obtains the consent of each Customer prior to posting any information on such a list or posting testimonials.

9. Feedback

We're always trying to improve our product and services, and your feedback as a User or any other 3rd party will help us do that. If you choose to give us any ideas, know-how, algorithms, code contributions, suggestions, enhancement requests, recommendations or any other feedback for our products or services (collectively, "Feedback"), you acknowledge and agree that Neptune Labs will have a royalty-free, fully paid-up, worldwide, transferable, sub-licensable, irrevocable and perpetual license to implement, use, modify, commercially exploit and/or incorporate the Feedback into our products, services, and documentation. You may give us your feedback via: mails, calls, video calls, Spectrum, Discourse, Intercom, Slack or any other communication channel.

10. Sharing of Information Collected

Neptune Labs may share Neptune's Users Personal Information with the Company's service providers so that these service providers can contact Customers and Visitors

who have provided contact information on our behalf. This concerns particularly entities providing IT services, couriers, delivery companies, security companies.

Neptune Labs may also share Neptune's Users Personal Information with the Company's service providers to ensure the quality of information provided. Unless described in this privacy statement, Neptune Labs does not share, sell, rent, or trade any information provided with third parties for their promotional purposes.

Neptune Labs uses a third-party service provider to manage credit card processing. This service provider is not permitted to store, retain, or use Billing Information except for the sole purpose of credit card processing on the Company's behalf.

Neptune Labs reserves the right to use or disclose information provided if required by law or if the Company reasonably believes that use or disclosure is necessary to protect the Company's rights and/or to comply with a judicial proceeding, court order, or legal process.

Neptune Labs may also share Neptune's Users Personal Information with other companies on the basis of joint control.

11. International Transfer of Information Collected

Neptune Labs uses mostly infrastructure located within the territory of the European Union. To facilitate Neptune Labs's global operations, the Company may transfer and access Neptune's Users Personal Information from around the world, including the United States. This Privacy Statement shall apply even if Neptune Labs transfers Neptune's Users Personal Information to other countries.

Neptune Labs declares that the Company is compliant with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

12. Communications Preferences

Neptune Labs offers Customers and Visitors who provide contact information a means to choose how the Company uses the information provided. You may send a request specifying your communications preferences to contact@neptune.ai. Customers cannot opt out of receiving transactional emails related to their account with Neptune Labs or the Services.

13. Security

The security of your personal information is important to us. We follow generally accepted standards to protect the personal information submitted to us, both during transmission and once it is received. Neptune Labs ensures that all source code, files and data remain private and confidential. Due to the sensitive nature of source code we take this very seriously and make it our primary concern for all customers. We restrict access to personal information to Neptune Labs employees, contractors and agents who need to know that information in order to operate, develop or improve our service. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

If you have any questions about the security of your personal information, you can contact us at contact@neptune.ai. We may retain your information for as long as your account is active or as needed to provide you services, comply with our legal obligations, resolve disputes and enforce our agreements.

14. Your rights related to data processing

You have the right to:

- access your personal data;
- rectify (correct, supplement) your personal data;
- limit the processing of or delete your data;
- transfer the personal data you have provided us with, i.e. receive the personal data in a structured, commonly used, machine-readable form and transfer the same to another Controller; if technically possible, you have the right to demand that we send the personal data directly to another Controller;
- object to further processing of your personal data.
- withdraw your consent at any time, withdrawal of consent will not affect legal compliance of your personal data processing carried out pursuant to the consent granted prior to its withdrawal.

In the case of any doubts as to the correctness of your personal data processing by Neptune Labs, you have the right to file a complaint with the President of the Office for Personal Data Protection.

Upon request Neptune Labs will provide you with information about whether we hold any of your personal information. You may access, correct, or request deletion of your personal information by logging into your account or by contacting us at contact@neptune.ai. We will respond to your request within 30 days. In certain circumstances we may be required by law to retain your personal information, or may need to retain your personal information in order to continue providing a service.

Neptune Labs has no direct relationship with the individuals whose personal data it processes. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data should direct their query to the Neptune Labs. If requested to remove data we will respond within 30 days. In certain circumstances we may be required by

law to retain your personal information, or may need to retain your personal information in order to continue providing a service.

15. Changes to this Privacy Statement

Neptune Labs reserves the right to change this Privacy Statement. Neptune Labs will provide notification of the material changes to this Privacy Statement through email and/or the Company's Web sites at least one business day prior to the change taking effect.

16. Contacting Us

Questions regarding this Privacy Statement or the information practices of the Company's Web sites should be directed to contact@neptune.ai.

Neptune Labs, Inc

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United States of America