

## 1. General.

We understand that you are aware of and care about your own personal privacy interests, and we take that seriously. This Privacy Statement describes Nuclei's policies and practices regarding the collection and use of your personal data

- when visiting the Nuclei Website, or
- when using Nuclei's Services,

and sets forth your privacy rights. We recognize that information privacy is an ongoing responsibility, and so we will from time to time update this Privacy Statement as we undertake new personal data practices or adopt new privacy policies.

By visiting our Website or by using our Services, you agree to the processing of information in accordance with this Privacy Statement.

## 2. Interpretation and Definitions.

### 2.1. Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

### 2.2. Definitions

For the purposes of this Privacy Statement,

"Account" means a unique account created for you to access our Service or parts of our Service;

"Affiliate" means an entity that controls, is controlled by or is under common control with a party, where "control" means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for election of directors or other managing authority;

"Application" means the Service / software program provided by us and used / downloaded by you on any electronic device, named "Nuclei Capture", "Nuclei AI", "Nuclei Recording", "Nuclei Data Migration", and generally "Nuclei Firehose";

"Business", for the purpose of the California Consumer Privacy Act (hereinafter in short "CCPA"), refers to us as the legal entity that collects Consumers' personal information and determines the purposes and means of the processing of Consumers' personal information, or on behalf of which such information is collected and that alone, or jointly with others, determines the purposes and means of the processing of consumers' personal information, that does business in the State of California;

"Consumer", for the purpose of the CCPA, means a natural person who is a California resident. A resident, as defined in the law, includes (i) every individual who is in the USA for other than a temporary or transitory purpose, and (ii) every individual who is domiciled in the USA who is outside the USA for a temporary or transitory purpose;

"Cookies" are small files that are placed on your computer, mobile device or any other device by a website, containing the details of your browsing history on that website among its many uses;

"Country" refers to the State of New Jersey, United States of America;

"Data Controller", for the purposes of the GDPR, refers to us as the legal person which alone or jointly with others determines the purposes and means of the processing of Personal Data;

"Device" means any device that can access the Service such as a computer, a cellular phone or a digital tablet;

“Do Not Track” (DNT) is a concept that has been promoted by US regulatory authorities, in particular the U.S. Federal Trade Commission (FTC), for the Internet industry to develop and implement a mechanism for allowing internet users to control the tracking of their online activities across websites;

“GDPR” is the abbreviation for Regulation (EU) 2016/679 of the European Parliament and Council of April 27th, 2016 on the protection of natural persons with regard to the processing of personal data, on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation);

“Personal Data” is any information that relates to an identified or identifiable individual:

For the purposes for GDPR, Personal Data means any information relating to you such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity.

For the purposes of the CCPA, Personal Data means any information that identifies, relates to, describes or is capable of being associated with, or could reasonably be linked, directly or indirectly, with you;

“Sale”, for the purpose of the CCPA, means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a Consumer’s Personal information to another business or a third party for monetary or other valuable consideration;

“Service” refers to the SaaS application provided by us;

“Service Provider” means any natural or legal person who processes the data on behalf of us. It refers to third-party companies or individuals employed by us to facilitate the Service, to provide the Service on behalf of us, to perform services related to the Service or to assist us in analyzing how the Service is used. For the purpose of the GDPR, Service Providers are considered Data (Sub-)Processors;

Third-party “Social Media Service” refers to any website or any social network website through which a User can log in or create an account to use the Service;

“Usage Data” refers to data collected automatically, either generated by visiting our Website, by the use of the Service or from the Service infrastructure itself;

“User” or “Customer” or “you” mean the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

Under the GDPR, you can be referred to as the “Data Subject” or as the User as you are the individual using the Service; and

“Website” refers to our Website – the entirety of this Internet presence including all sub-pages – accessible from <http://nuclei.ai>.

### 3. About Nuclei / DPO.

Nuclei Inc. (hereinafter in short “Nuclei”, “we” or “us”) is a company incorporated under the laws of the State of Delaware, with its principal office at 101 Crawfords Corner Road, Suite 4116, Holmdel, NJ 07733, United States of America.

We have appointed a certified Data Protection Officer (“DPO”) for you to contact if you have any questions or concerns about our personal data policies or practices. If you would like to exercise your privacy rights, or have any questions or concerns about our personal data policies or practices, please direct your query to our DPO at [compliance@nuclei.ai](mailto:compliance@nuclei.ai).

## 4. Visiting Nuclei's Website.

### 4.1. Use our Website / Server Log Files

As is true of most websites, our Website collects certain information automatically and stores it in server log files. The information may include internet protocol (IP) addresses, the region or general location where your computer or device is accessing the internet, browser type, operating system and other usage information about the use of our Website, including a history of the pages you view.

We use this information to help us design our Website to better suit its users' needs. We may also use your IP address to help diagnose problems with our server and to administer our Website, analyze trends, track visitor movements, and gather broad demographic information that assists us in identifying visitor preferences.

This Website is hosted by an external service provider, personal data collected on this Website is therefore stored on the servers of this service provider.

We have a legitimate interest in understanding how visitors use our Website, and in the secure and efficient provision of our online offer, cf. art. 6 (1) lit. f GDPR. This assists us with providing more relevant Services, with communicating value to our prospect, clients, employees and other relevant stakeholders.

### 4.2. SSL Encryption

Our Website uses SSL encryption (Secure Socket Layer) for the secure transmission of data from your browser to our server and to servers that provide files that we are embedding on our Website. You can recognize the presence of SSL encryption by the preceding text "https" in front of the address of our Website or, depending on your browser, for example by a key symbol in the header.

### 4.3. Cookies and Tracking Technologies

Our Website does not use Cookies.

### 4.4. Using "Simple Analytics"

To get critical information about the behavior of our visitors, we use [Simple Analytics](#). This analytics software gives us insight about our visitors only in general, but not about individuals by itself, as it does not track visitors and does not store any personal identifiable information. [Go to their documentation](#) to find out what Simple Analytics collects (and most importantly what they don't).

### 4.5. External Content

Our Website does not load external content from other domains.

### 4.6. Links to Third-Party Websites / Social Networks

This Website includes links to third party websites. If you follow such a link, we would like to point out that these websites have their own privacy policies and that we accept no responsibility or liability for this. Not before you click on such a link, will data be transmitted to the link destination; this is a technical necessity. The transmitted data are in particular your IP address, the time at which you clicked on the link, the page on which you clicked on the link and information about your browser. If you do not want data to be transmitted to the link destination, do not click on such a link.

You will also find links to Twitter and LinkedIn on this Website displayed by means of their corresponding logos. When you click on such a link, your browser establishes a direct connection with the servers of the respective social network. Since the transmission is direct, we do not have any knowledge of the transmitted data.

If you are logged in to the social networks at the same time or if active Cookies have already been set on your computer by these social networks, the social networks can associate your visit to our Website with your user account there. You can prevent this by logging out of the social networks before or by deactivating or removing Cookies that have been set.

For information about the purpose and scope of data collection by the social networks, the further processing and use of the data by the social networks, and your rights in this regard as well as setting options for protecting your privacy, please refer to the privacy policy of the respective social network.

#### 4.7. Sharing Information with Third Parties

The personal information we collect from you is stored in one or more databases hosted by third parties, located in the United States. These third parties do not use or have access to your personal information for any purpose other than cloud storage and retrieval. On occasion, we engage third parties to send information to you, including information about our Services.

We do not otherwise reveal your personal data to non-Nuclei related individuals or businesses for their independent use unless (i) you request or authorize it; (ii) it's in connection with Nuclei-hosted and Nuclei co-sponsored conferences; (iii) the information is provided to comply with the law (for example, compelled by law enforcement to comply with a search warrant, subpoena, or court order), enforce an agreement we have with you, or to protect our rights, property or safety, or the rights, property or safety of our employees or others; (iv) the information is provided to our agents, vendors or service providers who perform functions on our behalf; (v) to address emergencies or acts of God; or (vi) to address disputes, claims, or to persons demonstrating legal authority to act on your behalf. We may also gather aggregated data about our Services and Website visitors, and disclose the results of such aggregated (but not personally identifiable) information to our partners, service providers, advertisers, and/or other third parties for marketing or promotional purposes.

#### 4.8. Children's Data

We do not knowingly attempt to solicit or receive information from children or minors.

#### 4.9. Objecting to Advertising

The use of our contact data published on our Website for the purpose of sending unsolicited advertising and information material is hereby prohibited. We expressly reserve the right to take legal action in the event of the unsolicited sending of advertising information, for example by e-mail.

#### 4.10. Disclaimer

We regularly check and update the information on this Website but cannot assume any liability or guarantee for the topicality, correctness and completeness of the information provided. The same applies to other websites to which we refer by means of links.

#### 4.11. GDPR and/or CCPA

The aforescribed general language concerning our Website may be restricted, amended or altered by applicable terms of the GDPR and/or the CCPA, please refer to the respective clauses within this Privacy Statement.

### 5. Use of Nuclei's Services.

#### 5.1. Collecting and Using your Personal Data

Nuclei's Services are used to enable data portability between collaboration, social media, and enterprise information archiving platforms. By their nature, Nuclei's Services will have access to and process the following types of information:

#### 5.2. Personal Data

Personally identifiable information may include, but is not limited to:

- E-mail address
- First name and last name
- Phone number

## 5.3. Usage Data

Usage Data is collected automatically when using the Service. It may include information such as your device's IP address, browser type, browser version, platform-specific metadata, time and date of your activity on the source communication platform, unique device identifiers and other diagnostic data.

## 5.4. Tracking Technologies and Cookies

Our Services use Cookies and similar tracking technologies. Tracking technologies used are beacons, tags, and scripts to track and collect the activity on the Service, to store certain information, and to improve and analyze the Service. You can instruct your browser to refuse all Cookies or to indicate when a cookie is being set. However, if you do not accept Cookies, you may not be able to use some parts of the Service.

A Cookie is a small text file that is created when you access our Service via a web browser, and that is temporarily stored on your computer. It does not cause any damage and does not contain any viruses, but generally serves to make our Service more user-friendly, effective and secure. Cookies may also be technically necessary to enable and ensure the proper functioning of our Service. The legal basis in these cases is art. 6 (1) lit. f GDPR, i. e. the protection of our legitimate interest as the operator of our Service. We only use such cookies in accordance with art. 5 (1) lit. a GDPR, i. e. in accordance with the principles of lawfulness, processing in good faith, and transparency.

Generally, Cookies can be "persistent" or "session" Cookies. Persistent Cookies remain on your personal computer or mobile device for a preset period of time even after you go offline, while session Cookies are deleted as soon as you close your web browser.

We use both session and persistent Cookies for the purposes set out below:

### 5.4.1. Necessary / Essential Cookies

- Type: Session Cookies
- Administered by: Us
- Purpose: These Cookies are essential to provide you with services available through the Website and to enable you to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that you have asked for cannot be provided, and We only use these Cookies to provide you with those services.

### 5.4.2. Cookies Policy / Notice Acceptance Cookies

- Type: Persistent Cookies
- Administered by: Us
- Purpose: These Cookies identify if users have accepted the use of Cookies on the Website.

## 5.5. Use of your Personal Data

We may use Personal Data for the following purposes:

- To provide and maintain our Service, including to monitor the usage of our Service.
- To manage your Account: To manage your registration as a user of the Service. The Personal Data 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 e-mail, telephone, text message, 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 enquired about unless you have opted not to receive such information.
- To manage your requests: To attend and manage your requests to us.

We may share your personal information in the following situations:

- With Service Providers: We may share your personal information with Service Providers to monitor and analyze the use of our Service, for payment processing, to contact you.
- For Business transfers: We may share or transfer your personal 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.
- With Affiliates: We may share your information with our affiliates, in which case we will require those affiliates to honor this Privacy Statement. 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.

### 5.6. Retention of your Personal Data

We will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Statement. We will retain and use your Personal Data to the extent necessary to comply with applicable legal obligations, resolve disputes, and enforce our legal agreements and policies.

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.

### 5.7. Transfer of your Personal Data

Your information, including Personal Data, is processed using Amazon Web Services, Microsoft Azure, and in any other places where the parties involved in the processing are located. It means that this 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 than those from your jurisdiction.

Your consent to this Privacy Statement followed by your submission of such information represents your agreement to that transfer unless otherwise agreed in writing.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Statement and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

### 5.8. Disclosure of your Personal Data

#### 5.8.1. Business Transactions

If we were involved in a merger, acquisition or asset sale, your Personal Data may be transferred. We will provide notice before your Personal Data is transferred and becomes subject to a different Privacy Statement.



### 5.8.2. Law enforcement

Under certain circumstances, we may be required to disclose your Personal Data by law or in response to valid requests by public authorities (e.g. a court or a government agency).

### 5.8.3. Other legal requirements

We may disclose your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend our rights or property
- 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

### 5.8.4. Detailed Information on the Processing of your Personal Data

Nuclei's Cloud Service Providers do not have direct or unencrypted access to your Personal Data.

## 5.9. Analytics

We may use third-party Service providers to monitor and analyze the use of our Service.

## 5.10. 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 respective privacy policies. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

## 5.11. GDPR and/or CCPA

The aforementioned general language concerning our Services may be restricted, amended or altered by applicable terms of the GDPR and/or the CCPA, please refer to the respective clauses within this Privacy Statement.

## 6. Privacy under the GDPR.

### 6.1. Legal Basis of Processing

Art. 6 (1) lit. a GDPR serves as the legal basis for processing operations for which we obtain the Data Subject's consent for using the data for a specific processing purpose.

If the processing of personal data is necessary for the performance of a contract to which the Data Subject ("you") is a party, the processing is based on art. 6 (1) lit. b GDPR; this is the case, for example, for the delivery of goods or for the provision of services or return services. The same applies to processing operations that are necessary to carry out pre-contractual measures on the basis of inquiries about our Services.

If we are subject to a legal obligation which makes processing personal data necessary, such as the fulfillment of tax obligations, the processing is based on art. 6 (1) lit. c GDPR.

In rare cases, the processing of personal data may become necessary to protect vital interests of the Data Subject or of another natural person; the legal basis in these cases is art. 6 (1) lit. d GDPR.

Ultimately, processing operations may also be based on art. 6 (1) lit. f GDPR if they are not covered by any of the above legal bases. This may be the case if the processing is necessary to protect our legitimate interest or that of a third party, provided that the interests, fundamental rights, and freedoms of the Data Subject do not prevail; in those cases, we warrant to carefully consider the legal interests of all parties involved.

### 6.2. Data Collection

We obtain your personal data when you provide it to us. This can be, for example, the information you provide in a contact form or in an inquiry sent to us.

### 6.3. Disclosure and Transmission of Data

Your personal data will not be transferred to third parties for purposes other than those listed below. We only pass your data on

- if you have given your express consent to this in accordance with art. 6 (1) lit. a GDPR;
- if this is legally permissible and required in accordance with art. 6 (1) lit. b GDPR for the processing of
  - contractual relationships with you;
  - in the event that a legal obligation exists for the disclosure in accordance with art. 6 (1) lit. c GDPR;
  - if the disclosure is necessary to assert, exercise or defend legal claims in accordance with art. 6 (1) lit. f GDPR and if there is no reason to assume that you have a prevailing legitimate interest in the non- disclosure of your data;
- if we or our partners have a legitimate interest in accordance with art. 6 (1) lit. f GDPR to improve products and services and to be able to address customers in a more targeted manner in advertising campaigns thanks to detailed knowledge of target groups. In this case, data will only be passed on to our partners in anonymized form or, if this is not possible, in pseudonymized form; or
- within the framework of data processing in accordance with art. 28 GDPR. Our service providers process your data only insofar as this is necessary for the fulfillment of their service obligations and are obliged to fully comply with our instructions under applicable data protection law. To ensure this, we have concluded agreements on data processing, each of which is linked to corresponding technical and organizational measures in accordance with art. 32 GDPR, to ensure an appropriate level of protection.

### 6.4. Transferring your Personal Data to the United States of America

Nuclei is headquartered in the United States, therefore, all information we collect about you will be also processed in the United States. **By using our Website or Services, you explicitly acknowledge that your personal information will be processed in the United States.**

The United States have not sought nor received a finding of “adequacy” from the European Union under art. 45 GDPR. Pursuant to art. 46 GDPR, we are providing appropriate safeguards by entering binding, standard / model data protection clauses, enforceable by Data Subjects in the European Economic Area (EEA) and the United Kingdom (UK).

Depending on the circumstance, Nuclei also collects and transfers to the United States personal data with consent; to perform a contract with you; or to fulfill our compelling legitimate interest in a manner that does not outweigh your rights and freedoms. We endeavor to apply suitable safeguards to protect the privacy and security of your personal data and to use it only consistent with your relationship with us and the practices described in this Privacy Statement.

We also enter into data processing agreements and model clauses with our vendors whenever feasible and appropriate. Since Nuclei was founded, we have received zero government or supervisory requests for information.



## 6.5. Data Subject Rights

You have the right

- in accordance with art. 15 GDPR to **request information** about your personal data processed by us. In particular, you can request information about the processing purposes, the category of personal data, the categories of recipients to whom your data has been or will be disclosed, the planned storage period, the existence of a right to rectification, erasure, restriction of processing or objection, the existence of a right of complaint, the origin of your data if it has not been collected by us, as well as the existence of automated decision-making including profiling and, if applicable, meaningful information about its details;
- in accordance with art. 16 GDPR to **request the immediate correction** of incorrect or completion of incomplete personal data stored by us;
- in accordance with art. 17 GDPR to **request the erasure** of your personal data stored by us, unless the processing is necessary to exercise the right to freedom of expression and information, to comply with a legal obligation, for reasons of public interest, or to establish, exercise, or defend legal claims;
- in accordance with art. 18 GDPR to **request the processing of your personal data to be restricted**, insofar as the accuracy of the data is disputed by you, the processing is unlawful while you object to its erasure and we no longer require the data but you need it to assert, exercise or defend legal claims or you have objected to the processing in accordance with art. 21 GDPR;
- in accordance with art. 20 GDPR to **receive your personal data** that you have provided to us in a structured, common and machine-readable format or to request the transfer to another Data Controller;
- in accordance with art. 22 GDPR to **not be subject to a decision based solely on automated processing**, including profiling, which has legal effects on you or significantly affects you in a similar manner;
- in accordance with art. 7 (3) GDPR to **revoke your consent** given to us at any time. This has the consequence that we may no longer continue to process your data based on this consent for the future, but the lawfulness of the processing carried out up to this point is not affected; as well as
- in accordance with art. 77 GDPR, to **file complaint with the supervisory authority** responsible, without prejudice to any other administrative or judicial remedy, if you believe that the processing of your personal data by us does not comply with the articles of the GDPR.

## 6.6. Exercising of your Rights under the GDPR

You may exercise your rights according to section 6.4 by sending an e-mail to [compliance@nuclei.ai](mailto:compliance@nuclei.ai). Please note that we may ask you to verify your identity before responding to such requests. If you make a request, we will try our best to respond to you as soon as possible.

You also have the right to complain directly to a Data Protection Authority about our collection and use of your Personal Data. For more information, if you are in the European Economic Area, please contact your local Data Protection Authority.

## 7. Privacy under the CCPA.

### 7.1. Your Rights under the CCPA

Under this Privacy Statement, and by law if you are a resident of California, you have the following rights:

- **The right to notice.** You must be properly notified which categories of Personal Data are being collected and the purposes for which the Personal Data is being used.
- **The right to access / the right to request.** The CCPA permits you to request and obtain from us the information regarding the disclosure of your Personal Data that has been collected in the past twelve (12) months by us or our subsidiaries to a third party for the third party's direct marketing purposes.
- **The right to say no to the sale of Personal Data.** You also have the right to ask us not to sell your Personal Data to third parties. You can submit such a request by sending an e-mail to [compliance@nuclei.ai](mailto:compliance@nuclei.ai).
- **The right to know about your Personal Data.** You have the right to request and obtain from us information regarding the disclosure of the following:
  - The categories of Personal Data collected
  - The sources from which the Personal Data was collected
  - The business or commercial purpose for collecting or selling the Personal Data
  - Categories of third parties with whom we share Personal Data
  - The specific pieces of Personal Data we collected about you
- **The right to delete Personal Data.** You also have the right to request from us the deletion of your Personal Data that have been collected in the past twelve (12) months.
- **The right not to be discriminated against.** You have the right not to be discriminated against for exercising any of your Consumer's rights, including by:
  - Denying goods or services to you
  - Charging different prices or rates for goods or services, including the use of discounts or other benefits or imposing penalties
  - Providing a different level or quality of goods or services to you
  - Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services

### 7.2. Exercising your CCPA Data Protection Rights

In order to exercise any of your rights under the CCPA, and if you are a California resident, you can e-mail us at [compliance@nuclei.ai](mailto:compliance@nuclei.ai).

We will disclose and deliver the required information free of charge within forty-five (45) days of receiving your verifiable request. The time period to provide the required information may be extended once by an additional forty-five (45) days when reasonably necessary and with prior notice.

### 7.3. Do Not Sell My Personal Information

We do not sell personal information. However, the service providers we partner with may use technology on the service that "sells" personal information as defined by the CCPA.

If you wish to opt out of the use of your personal information for interest-based advertising purposes and these potential sales as defined under the CCPA, you may do so by following the instructions below.

Please note that any opt out is specific to the browser you use. You may need to opt out on every browser that you use.

## 7.4. Mobile Devices

Your mobile device may give you the ability to opt out of the use of information about the apps you use in order to serve you ads that are targeted to your interests:

- "Opt out of Interest-Based Ads" or "Opt out of Ads Personalization" on Android devices
- "Limit Ad Tracking" on iOS devices

You can also stop the collection of location information from your mobile device by changing the preferences on your mobile device.

## 7.5. "Do Not Track" Policy as Required by California Online Privacy Protection Act (CalOPPA)

Our Service does not respond to Do Not Track signals. However, some third-party websites do keep track of your browsing activities. If you are visiting such websites, you can set your preferences in your web browser to inform websites that you do not want to be tracked. You can enable or disable DNT by visiting the preferences or settings page of your web browser.

## 7.6. Your California Privacy Rights (California's Shine the Light law)

Under California Civil Code Section 1798 (California's Shine the Light law), California residents with an established business relationship with us can request information once a year about sharing their Personal Data with third parties for the third parties' direct marketing purposes.

If you'd like to request more information under the California Shine the Light law, and if you are a California resident, you can contact us using the contact information provided in this Privacy Statement.

## 7.7. California Privacy Rights for Minor Users (California Business and Professions Code Section 22581)

California Business and Professions Code section 22581 allow California residents under the age of 18 who are registered users of online sites, services or applications to request and obtain removal of content or information they have publicly posted.

To request removal of such data, and if you are a California resident, you can contact us using the contact information provided below and include the e-mail 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.

## 8. Personal Information, Contact and Newsletter.

Information we collect about Nuclei Website visitors and Nuclei customers is limited to the following:

- Name
- Job title
- Customer / employer name
- Business address
- Business e-mail and phone number
- Business payment information

Generally, we use this information to provide prospects and customers with Services and to fulfill our contractual obligations. We do not sell personal information to anyone and only share it with third parties who are facilitating the delivery of our Services.

From time to time, we receive personal information about individuals from third parties. Typically, information collected from third parties will include further details on your employer or industry. We may also collect your personal data from a third-party website (e.g. LinkedIn).

If you contact us (i) via forms on this Website or (ii) by e-mail or telephone; (iii) register for a newsletter via contact form or e-mail or (iv) via contact form for access to our partner portal, your contact or inquiry, including the personal data you provide, will be processed by us for the purpose of processing the inquiry and in the event of follow-up questions.

If you subscribe to our newsletter by e-mail or by using the contact form on our Website, your personal data transmitted in this way will be processed for this purpose. The legal basis is your consent given by the inquiry or input, cf. art. 6 (1) lit. a GDPR.

You can object to receiving the newsletter at any time by clicking on the unsubscribe link in the newsletter or by sending us a message and thus object to the processing of your personal data (see section "Data Subject Rights").

To verify the authenticity of your e-mail address entered in contact forms on our Website, you will receive an automatically generated e-mail after submission with a request to reconfirm the subscription (so-called double opt-in). Only then will your personal data be permanently captured in our newsletter database or the database of interested parties; otherwise it will be deleted.

If you have asked us for information material such as whitepapers or marketing information or registered for one of our webinars/events, we will send you the requested material or contact you as requested. We will then store your data in our database of interested parties until you revoke your consent.

We commission data processors for some of the activities described above, in particular for sending newsletters or other promotional material, sometimes also in connection with the associated authentication procedures via contact forms (see section "Disclosure and Transfer of Data").

We do not share your data without your consent. Your data is processed on basis of art. 6 (1) lit. b GDPR, if your inquiry is related to the performance of a contract or if it is necessary for the implementation of pre- contractual measures. In all other cases, processing is based on our legitimate interest in the effective processing of inquiries sent to us (art. 6 (1) lit. f GDPR) or on your consent (art. 6 (1) lit. a GDPR), if this has been obtained or if you have contacted by means of a form.

## 9. Data Storage and Retention.

All transmitted data is stored on our servers, and on servers of the cloud-based services we engage, located in the United States.

We retain Service data for the duration of your relationship with us and for a reasonable period thereafter, to analyze the data for our own operations, and for historical and archiving purposes associated with our Services.

All data will remain with us until (i) you request us to delete it; (ii) revoke your consent to store it; or (iii) the purpose for storing such data no longer applies (for example, after we have completed processing your inquiry or the business relationship between you and us has come to its end).

Mandatory legal provisions – in particular retention periods provided by law – remain unaffected.

## 10. Handling Applicant Data.

If you apply for working with Nuclei, we assure you that your data will be processed in accordance with applicable data protection laws and that your data will be treated in strict confidence.

information posted online and that the law may not permit or require removal in certain circumstances.

## 11. Further Information on Information Security.

We protect our Website and Services appropriately against loss, destruction, unauthorized access, unauthorized modification, or unauthorized disclosure of your data by means of suitable technical and organizational measures.

As we cannot guarantee data security, particularly not in case of unencrypted communication by e-mail, we recommend sending confidential information by letter mail.

## 12. Changes to this Privacy Statement.

We reserve the right to change this Privacy Statement if the legal situation or this online offer or the type of data processing changes. However, this only applies with regard to declarations on data processing. If the User's consent is required or components of this Privacy Statement contain a regulation of the contractual relationship with Users, this Privacy Statement will only be changed following the User's consent.