

PRIVACY POLICY

Your privacy is important to us. This privacy policy (the “**Policy**”) describes how Gnovelty (the “**Company**”, “**Us**” or “**We**” or “**Our**”) collects and uses information from the website www.gnovelty.com (the “**Site**” or “**Platform**”). This Policy does not apply to any of our other services unless stated otherwise.

By accessing and using the Platform and its services, you agree to be bound by this Privacy Policy. If you do not agree to any of the provisions as set hereunder in this Privacy Policy, please do not use the Platform or any of its services.

This Policy should be read together with the Terms of Use (“**TOU**”), which also apply to the Platform.

This Policy does not apply to other websites that post different statements, regardless of whether or not the Platform links to them.

1. **NO USERS UNDER 13.**

You must be 13 years old or older (the “**Permitted Age**”) to use the Platform. If you are under the Permitted Age, please refrain from using the Platform and/or from providing us with any information. We do not knowingly collect information from Users under the Permitted Age. If we become aware that we have collected personal information from someone under the Permitted Age, we will use reasonable efforts to delete it.

If you are older than 13 but under 18, or under the legal age of maturity in your jurisdiction (normally 18 years), then you must obtain permission from your parent or legal guardian to accept this Policy and use Our Platform. By using the Service, you declare to us that you have obtained it.

We may terminate your account if we find that you are younger than the Permitted Age and/or if we did not receive Parental Consent. We may at any time request additional information to confirm your age.

2. **WHAT INFORMATION DO WE COLLECT**

We collect the following information so that we can provide you with our service:

2.1. **Information You Give Us.** We collect your full name, postal address, email address, phone number, username, location, age, as well as other information you directly give us on our Platform (for example, in your profile or dashboard), or that you send us (including, but not limited to, information sent to us when you connect and/or interact with the Platform through other third party services or platforms, such as Facebook and Google if your account settings on those platforms allow this).

2.2. We also collect **information generated from interactions** conducted through our Platform between Users and Patent Attorneys, and any other service providers. This information includes message content, timestamps of communications, and any attachments or documents shared during these interactions.

2.3. **Information We Get from Others.** We may get information about you from other sources, for example social platforms (such as Facebook), with which you connect to the Platform (if your account settings on those platforms allow this).

We may collect content and documents created by Patent Attorneys, and any other service provider generated for Users part of the Service, including but not limited to, legal or IP-related documents, reports, and any other related materials.

2.4. **Anonymous Information Automatically Collected.** We automatically log anonymous information about you and the device (computer, mobile phone etc.) you use when using the Platform in order to improve our services and your experience. For example, when visiting our Platform, we log your device's operating system, browser type, browser language, IP address, session duration and other general statistical information.

3. COOKIES

3.1. We use cookies and similar technologies on our Platform to provide a seamless and personalized User experience, analyze Platform and Service performance. Cookies are small data files stored on your device that allow us to **recognize** your preferences and customize your interaction with the Platform. Below, we outline how we use cookies and how you can manage them:

3.2. Types of Cookies We Use:

- **Essential Cookies:** These cookies are necessary for the operation of the platform and enable core functionalities, such as secure access and navigation.
- **Analytics and Performance Cookies:** These cookies help us understand how Users interact with the platform, allowing us to improve functionality and performance.
- **Functionality Cookies:** These enable us to remember your preferences and provide a more personalized experience.
- **Marketing and Advertising Cookies:** These cookies are used to deliver relevant advertisements and measure the effectiveness of our marketing efforts.

3.2.1. **Consent to Use Cookies:** We seek your explicit consent before using non-essential cookies. When you first access our platform, you will see a cookie banner providing the option to accept or customize your cookie preferences.

3.2.2. **Managing Cookies:** You can manage or withdraw your consent at any time by accessing the “Cookie Settings” in your account or platform settings. Additionally, most web browsers allow you to block or delete cookies through their settings. Please note that disabling certain cookies may impact your experience on the platform.

3.2.3. **Data Collected Through Cookies:** Cookies may collect non-personalized or anonymized data, such as platform usage statistics, as well as certain personal data depending on your preferences and interactions. Data collected through cookies is used solely for the purposes specified and will not be used to identify you without your consent.

3.2.4. **Third-Party Cookies:** We work with trusted third-party service providers (e.g., Google Analytics) to enhance our platform **and** deliver personalized content. These providers may use cookies according to their privacy policies. We recommend reviewing their policies for further details.

3.2.5. **Retention Period:** Cookies are stored for varying durations based on their type and purpose. Some are session-based and deleted when you close your browser, while others are persistent and remain until their expiration date or manual deletion.

3.3. **Updates to This Policy:** We may update this cookies section to reflect changes in technology, regulations, or our practices. You will be notified of significant changes where required.

4. **USE OF PERSONAL INFORMATION.**

We use your personal information to provide you with the services on our Platform and to improve your experience on our Platform. Additionally, we may use your information to:

- Operate, maintain and improve our Platform;
- Send you information including confirmations, invoices, updates, security alerts, and support and administrative messages;
- Respond to comments and/or questions and to assist you with any technical support (establish and set up your account, verify or re-issue a password), log your activity and contact you;
- Protect, investigate and deter against fraudulent, unauthorized or illegal activity;
- Provide and deliver products and services that you may request;
- To protect you and/or other Users and prevent any use of the Platform which is unlawful or against our TOU;
- To resolve disputes and troubleshoot problems, and:
- Send you marketing emails if you agreed to these when signing up. You may ask to be unsubscribed at any time;

5. **SHARING OF PERSONAL INFORMATION**

We may share personal information as follows:

- When you provide your consent. For example, you may let us share personal information with third parties or other Users. Third parties are subject to their own privacy policies.
- When we do a business deal, or negotiate a business deal, involving the sale or transfer of all or a part of our business or assets. These deals can include any merger, financing, acquisition, or bankruptcy transaction or proceeding.
- For legal, protection, and safety purposes, for example:
 - To comply with laws.
 - To lawful requests and legal processes.
 - To protect the rights and property of the Company, its agents, customers, and others. This includes enforcing our agreements, policies, and TOU.
 - In an emergency. This includes protecting the safety of our employees and agents, our customers, or any person.
- With third party service providers, such as Patent Attorneys, in order to provide you with specific services and/or features; or service providers that provide the Platform's digital infrastructure.
- We may also share general aggregated and/or anonymized data with others for their own uses. This information does not personally identify you.

6. **INTERNATIONAL INFORMATION**

Due to the fact that some of the Services are provided by third parties located in various locations worldwide, your information may be transferred to, and stored on, computers or servers located at these other countries - outside of your country or legal jurisdiction (the "**Transfer**"). Additionally, the privacy laws of these countries may differ from those in your jurisdiction. By using our services and/or providing us with your personal information, you are giving us your consent to this Transfer.

Also, the personal information we collect may be transferred to and stored in countries outside your jurisdiction, where we and our third-party service providers operate. These international transfers are conducted in compliance with appropriate safeguards, such as standard contractual clauses approved by the European Commission. For further information regarding these safeguards, please feel free to contact us using the details provided at the end of this privacy policy. If you are located in the European Union (EU), note that your information might be transferred and processed outside the EU.

7. PROTECTION OF INFORMATION

Your personal information is protected in several ways. For example, access to your account and personal information is available only through a password and unique username/User ID selected by you. Additionally, your personal information is stored on secured servers of approved third party service providers, and only selected personnel have access to.

By creating an account, you agree to keep your password and username in strict confidence and not disclose such information to any third party. Should you feel that your password or account has been compromised, please let us know immediately.

Although we use industry standard security measures to protect your personal information so that it is not made available to unauthorized parties, we cannot guarantee that the information submitted to, maintained on, or transmitted from our systems will be completely secure and any information you provide is your sole responsibility and subject to this Policy and our TOU.

8. VIEWING AND UPDATING YOUR INFORMATION.

Editing Your Information: You may review, edit or delete your personal information by sending us a request by email. Once you delete or cancel your account, we may delete your personal information, except for information needed for ongoing issues such as outstanding payments or legal proceedings. When necessary, we may keep specific identifiable information for up to 7 years, in order to comply with the law, prevent fraud, assist with any investigation and enforce our Platform TOU.

9. EU CITIZENS DATA PROTECTION RIGHT

This section applies to individuals located in the EU or the European Economic Area (EEA).

In accordance with the General Data Protection Regulation (GDPR), Gnovelty acts as both the Controller and Processor of personal data as outlined in this Privacy Policy. This means that we determine how and why your personal data is processed while also ensuring that it is handled securely and in compliance with GDPR regulations.

You have specific rights regarding your personal data, including the right to access, rectify, erase, restrict processing, object to processing, and data portability as follows:

- Access right: you have the right to request copies of your personal data.
- Rectification right: you have the right to request us to change and correct any information you think is inaccurate.
- You have the right to ask us to complete the incomplete information.
- Erasing information right: you have the right to request from us to erase your personal data in the following conditions:
 - a) If you believe that holding your data is no longer necessary for us.

- b) If we're processing it based on legitimate interests and you object, with no overriding reason for us to continue.
- c) If you provided it with consent, withdraw that consent, and no other legal basis exists.
- d) If you believe we are processing it unlawfully.
- You can request restriction of your personal information processing if:
 - a) You dispute its accuracy.
 - b) Processing is unlawful, but you prefer restriction over deletion.
 - c) We no longer need it, but it is required to establish, exercise, or defend a legal claim.
 - d) You object to processing based on legitimate interests, and we are reviewing your objection.
- You have the right to object to decisions made solely through automated processing or profiling.
- You have the right to request the transfer of your collected data to another organization or directly to you, under certain conditions.

If you wish to exercise these rights or have any questions regarding the processing of your personal data, please contact us using the details provided in this Privacy Policy.

10. **COMMUNICATIONS AND PROMOTIONS.**

By signing up to our Platform, you agree to receive emails with promotional content related directly or indirectly to our services, including, for example, service suggestions and other news about products and services offered by us and our selected partners. You can opt-out of these communications at any time using the 'unsubscribe' link provided in them, or by contacting us by email, after which we will no longer send you promotional emails. We may still send you non-commercial emails which are necessary in order to provide you with the services.

11. **CHANGES TO THIS PRIVACY POLICY.**

This Policy may be changed occasionally. If we make any substantial changes, we may notify you by sending you an e-mail to the last e-mail address you provided, and/or by posting notice of the changes on our Platform. Any changes will be effective upon the earlier of ten (10) calendar days following our email or ten (10) calendar days following our posting of the notice on our Platform. These changes will be effective immediately for new Users of our Platform. Continued use of our Platform following notice of such changes shall indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.

12. **ABUSE OF PRIVACY AND CONTACT INFORMATION.**

We take your privacy seriously. If you have any concerns, please let us know.

We welcome your comments and questions. You may contact us at: info@gnovelty.com

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