PRIVACY POLICY

Welcome to Jada Ai (hereinafter referred to as "Jada Ai") Global Privacy Policy ("Privacy Policy"). Please take a few moments to read this Privacy Policy carefully before providing us with any personal information about you or anybody else.

• INTRODUCTION.

Jada Ai is the controller and responsible for your personal data (collectively referred to as "Jada Ai", "we", "us"). We value your privacy and are committed to safeguarding your personal information. Jada Ai (doing business under the trade name "Jada Ai") and its affiliates (collectively, "Jada Ai") appreciate you trusting us with your personal information by visiting our website <u>jada-ai.com</u> (the "Website") and, more broadly, by using any of our services (the "Services,") which include the Website.

We take the protection of your personal information very seriously, and we hope that this privacy policy will help you understand what information we collect, how we use it, and what rights you have in connection to it. This Privacy Policy applies to Jada Ai and all Jada Ai services and its website.

By using the Jada Ai website and services, you consent to the collection, storage, processing, and transfer of your personal information as outlined in this Privacy Policy.

Please, take some time to read the following carefully to gain a better understanding of how we collect, view, and utilize your personal information because it is essential. If you do not agree with any of the terms and conditions in this privacy policy, please desist from using our services and the website immediately.

You equally confirm that you are of legal age to access and use our website and services in accordance with its terms and conditions. If a minor supplies Jada Ai with personal information without his or her parent's or guardian's consent (as defined by applicable law), the parent or guardian may contact Jada Ai to request for the removal or deletion of the information.

• THE AIM OF THIS PRIVACY POLICY

The main aim of this Privacy Notice is to explain how Jada Ai, and any of its subsidiaries, and international branches (hereinafter referred to as "Jada Ai" "us," "we," or "our") collect, use, and share information about you through our online interfaces (collectively referred to herein as the "Site").

This Privacy Policy explains your privacy rights and how the EU General Data Protection Regulation ("GDPR") the UK GDPR, the UK-Brexit privacy law, any other privacy law, protects you.

Please contact us at <u>hello@jada-ai.com</u> if you have any questions or concerns about our Privacy Notice. Our Terms and Conditions also apply to your usage of our services and website with regards to certain terms used but not defined in this Privacy Notice.

Jada Ai is a Delaware-based company with headquarters in the United States of America. Jada Ai is the data controller of all Personal Data (as defined below) collected via this website and of certain Personal Data collected from third parties.

THE DATA WE COLLECT ABOUT YOU

This Privacy Policy applies to information we obtain from you via our services and the site. Some of our Site's functionality can be accessed without revealing any Personal Data, however Personal Data is necessary for Services. You may be required to provide, or we may collect, "Personal Data" (which may also be referred to as "personally identifiable information" or "personal information") from you to be able to use certain features on our Site.

"Personal data", often known as personal information, refers to any information on a living person who can be identified. This is a wide term that encompasses the kind of personal data we've discussed below. It excludes information that cannot be used to identify a specific individual, such as the registration number of a company.

A "Data Subject" is a person who may be identified by personal data, either directly or indirectly. This is commonly accomplished using an identifier like a name, identification number, location data, an online identifier, or one or more elements particular to that natural person's physical, physiological, genetic, mental, economic, cultural, or social identity.

We will collect, use, store, and transfer different types of personal data about you depending on whether and how you use our Services, Site, (if any), which we have divided into categories as follows:

Personal Data Classification

Specific examples of personal information:

Personal Information

• first name,

- maiden name,
- last name,
- username or similar identifier,
- title,
- date of birth and gender,
- biometric information, including a visual image of your face,
- national identity cards,
- passports, driving licenses or other forms of identification documents.

Data on Social Identity

- your group/company data,
- information on referrals related to you,
- political background,
- close connections,
- behavioural data,
- risk assessment,
- compliance assessment.

Contact Data

- residence details,
- billing address,
- delivery address,
- home address,
- work address,
- email address and telephone numbers,
- proof of address documentation.

Data from Transactions

- details about payments to and from you,
- other details of any transactions you enter into using our Services, the Site.

Profile Data

- your username and password,
- your identification number as our user,
- information on whether you have an account with us, and the email associated with your account,

- requests by you for products or services,
- your interests, preferences, and feedback
- other information generated by you when you communicate with us, for example when you address a request to our customer support.

Usage Data

- information about how you use the Site, our Services, other applications made available by us to you, including:
- device download time,
- install time,
- interaction type and time,
- event time, name, and source.

Data on Marketing and Communications

Our preferences in receiving marketing from us or third parties,

- your communication preferences,
- your survey responses.

Technical Data

- internet connectivity data,
- internet protocol (IP) address,
- operator and carrier data,
- login data,
- browser type and version,
- device type, category, and model,
- time zone setting and location data,
- language data,
- application version and SDK version,
- browser plug-in types and versions,
- operating system and platform,
- diagnostics data such as crash logs and any other data we collect for the purposes of measuring technical diagnostics, and
- other information stored on or available regarding the devices you allow us access to when you visit the Site or our Services.

Financial Data

bank account,

- payment card details,
- virtual currency accounts,
- external account details,
- source of funds and related documentation

Personal data in special categories.

The legislation that applies to you provides additional protection for some types of sensitive personal data. "Special categories" of personal data are what they're termed. The following are the special categories:

- Personal information that reveals a person's racial or ethnic origin.
- Opinions on politics
- Beliefs in religion or philosophy.
- Membership in a labor union.
- Processed genetic and biometric data with the goal of uniquely identifying a natural individual.
- Health-related information.
- Information about a person's sexual life or sexual orientation.

We will only use special categories of personal data for a specific purpose only when necessary and if we can meet both the lawful basis requirements listed below, as well as at least one of the extra conditions:

- You have given your explicit permission.
- Processing refers to personal information that you have knowingly made public.
- Processing is required to create, exercise, and defend legal claims.
- ٠

You must provide us with true, complete, and accurate personal information, and you must inform us of any changes thereof.

• What You Agree to By Using Our Site

It is important that you know the legal basis for using your personal information. They include:

• To fulfil our obligations under any contract we may have with you (for example, to comply with the Terms of Use of our Site, which you accept by browsing our website, and/or to comply with our contract to provide you with services as agreed upon via direct communication with the staff of

the Jada Ai Group, or any other organization that may be providing you with access to our Services); or

- To comply with legal requirements; or
- Our legitimate interests or the legitimate interests of others require the use of your personal information. It is in our legitimate interests to:
- carry out research and statistical analysis;
- carry out marketing and business development;
- for internal administrative and auditing purposes;
- operate our Site and provide our Services;
- select appropriately skilled and qualified suppliers;
- build relationships with partners and educational institutions; and,
- run, grow and develop our business;
- To send you some communications or collect certain information from you, if your local law requires us to rely on consent.

• How We Collect Your Data

We acquire information from and about you through a variety of means, including:

• Direct Interactions: By directly interacting with us, such as by filling out forms, by email, or otherwise, you may provide us with your Identity Data, Contact Data, Financial Data, Profile Data, and Marketing and Communications Data.

This includes any personal information you give us when you:

- visit our Site or other platforms;
- apply for our Services;
- create an account;
- make use of any of our Services;
- request marketing to be sent to you, for example by subscribing to our newsletters;
- enter a competition, promotion, or survey, including through social media channels;
- give us feedback/reviews or contact us.
- Automated technologies or Interactions: We will automatically collect Technical Data about your equipment, browsing actions, and habits as you engage with us via our Site or platforms. Cookies, server logs, and other similar technologies are used to collect this personal data. Transactional Data will also be collected. If you visit other websites that use our cookies, we may get Technical Data and Marketing and

Communications Data about you. More information about how we use cookies can be found in our Cookies Policy.

- Third parties or publicly available sources: We also get information about you from other parties or publicly available sources. Among these sources are:
- fraud and crime prevention agencies,
- a customer referring you,
- public blockchain,
- publicly available information on the Internet (websites, articles, social media etc.)
- How We Use Your Data

Providing the Site and our Services: We use the Personal Data you give us to allow you to access and use the Site, as well as to provide you with any information, products, or services you request.

Security and technical support: Personal Data may be used to provide you with technical help and to protect the security of our Services and the Site.

Identity Verification: We may use the Personal Data we collect to validate your identity and authenticate the submissions made on the Site were made by you, that require identity verification. A third-party identity verification firm could be hired to provide this service.

Communications with or from Jada Ai: We may use the information you give when you send us an email message or otherwise contact us to reply to your communication and/or as specified in this Privacy Policy. Where we are legally permitted to do so, we may also archive this information and/or utilize it for future communications with you. When we send you emails, we may keep track of how you interact with them (such as when you open an email or click on a link inside an email). We use this information to improve and customize our communications to you.

Communications with our Buisness Partners: We may share your Personal Data with our business partners so that they can share information about their products and services that may be of interest to you when they are legally permitted to do so. Job applications;

The legal basis we rely on:

 Consent ; where you have given us clear consent for us to process your personal information for a specific purpose
Contract : where our use of your personal information is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract
Legal obligation: where our use of your personal information is necessary

for our legitimate interests or the legitimate interests of a third party

(unless there is a good reason to protect your personal information which overrides our legitimate interests).

• Disclosure of Your Data

To execute tasks and deliver the Services to you on our behalf, we might transfer your personal data to our third-party service providers, agents, subcontractors, and other related organizations and affiliates.

When using third-party service providers, they are required to respect the security of your personal data and treat it in a legal manner. Based on the following legal grounds, we may process or share your data:

- If you have granted us express consent to use your personal information for a specific purpose, we may handle your data. (Consent)
- When processing your data is reasonably necessary to achieve our legitimate business interests. (Legitimate Business Interests)
- If we have a contract with you, we may use your personal information to carry out the terms of that contract. (Contractual Performance)
- To comply with applicable legislation, governmental demands, a judicial procedure, court order, or legal process, such as in response to a court order or a subpoena, we may release personal information (including in response to public authorities to meet national security or law enforcement requirements). (Legal Obligations)
- If we believe it is necessary to investigate, prevent, or act in connection with potential policy violations, suspected fraud, situations involving potential threats to the safety of any person, or illegal activities, or as evidence in litigation in which we are involved. (Vital Interests)

In the following circumstances, we may need to process your data or share your personal information with third parties:

- Transferring a business: We may share or transfer your information in connection with or during any merger, sale of company assets, financing, or acquisition of all or a portion of our business by another company, or during any merger, sale of company assets, financing, or acquisition of all or a portion of our business by another company.
- Advertisers: When you access or use the Website, we may utilize thirdparty advertising businesses to show ads. These companies may use information from web cookies and other tracking technologies about your visits to our Site and other platforms to serve you advertising for services that you might be interested in.

- Affiliates: We may share your information with our affiliates, in which case we will require them to adhere to the terms of this Privacy Policy. Any subsidiaries (if there are any), joint venture partners, or other firms that we control or share shared control with, are considered affiliates.
- Third-Party Service Providers : We may share your information with thirdparty service providers, contractors, or agents who perform services for us or on our behalf and need access to certain information to do so. Payment processing, data analysis, email delivery, hosting services, customer support, and marketing activities are just a few examples. We may allow certain third parties to use tracking technology on the Website to collect data on our behalf about how you interact with it over time. This information can be used to evaluate and track data, determine the popularity of specific content, pages, or features, and gain a better understanding of online activity. We do not disclose, sell, rent, or lease your personal information unless otherwise stated in this Privacy Policy.
- International Privacy Practices Because some of our external third parties and affiliates might be located outside of the EEA or the UK, their processing of your personal data will need a data transfer outside of the EEA or the UK. This will necessitate the transfer of your personal information outside of the European Economic Area (EEA) or the United Kingdom as the case may be.

We provide a similar level of protection for your personal data if we send it outside of the EEA or the UK by implementing at least one of the following safeguards:

- The European Commission has determined that the country to which we transfer your personal data provides an adequate level of protection for personal data;
- A specific contract approved by the European Commission that provides safeguards for the processing of personal data, known as Standard Contractual Clauses.

Be informed that we manage and run our site and Services from the US. Your Personal Data may be sent outside of the country in which you reside or are located, to provide our Services to you. If you would like more information on the exact method, we use to transfer your personal data outside of the EEA or the UK, please get in touch with us at hello@jada-ai.com.

We are dedicated to maintaining the privacy and secrecy of Personal Data throughout transit. To the extent permitted by applicable law, we take the necessary measures to offer the same level of protection for the processing carried out in any such countries as you would have within the EEA or other regions if you reside in the EEA, the United Kingdom, Switzerland, or another region that offers comparable protections.

• International Privacy Practices

Jada Ai headquarters are located in Dubai and the Platform is run from the US. We follow the standard set by European Union ("EU") data protection rules and, therefore, when we share personal information of EU and UK users with service providers located outside the EU and UK, we put in place appropriate contractual guarantees to ensure the use of your personal information takes place under a similar standard only.

Please contact us through <u>hello@jada-ai.com</u> if you would like more information on the location of our third-party service providers and the guarantees in place to transfer your personal data to service providers outside of the EU and UK.

• What are your rights?

Depending on your location, your legal rights in relation to your personal information are different.

As commented, we follow the standard set by EU data protection rules to have a uniform set of guidelines and rules to use information about our users, regardless of where they are located.

This way we ensure we follow one of the most developed and user-friendly regimes in the world.

When necessary, we will adapt to your local legislation to provide you with the rights it recognizes to you.

You have the following rights in respect to the use of your personal information:

- Right to access: you can request access to and a copy of your personal information. This permits you to request confirmation that we are processing your personal information and information about how we are using it.
- Right to rectification: you can request that we correct information that you believe is incorrect and complete information that you believe is missing, albeit we may need to verify the veracity of the new data provided by you.
- Right to erasure: you can request to erase or destroy any personal data we hold about you; however, we may not always be able to comply with your request if there is an ongoing service with you and we need your information to manage any pending obligations or if there are legal reasons preventing us from doing so.
- Right to object: you have the right to object to us using your information to inform you about content that we think might be relevant

for you as well as for the activities to operate the Platform by directly contacting us through <u>hello@jada-ai.com</u>. In the latter case, we may demonstrate that we have compelling legitimate grounds to process your information.

- Right to restriction of processing: you have the right to limit our use of your information if you dispute its accuracy or you think we should not be using your information, for the time necessary to verify your claim.
- Right to data portability: you have the right to request the transfer of your profile information to you or to a third party. We will provide the information in a structured, commonly used, machine-readable format.
- Right to withdraw you consent: where you have freely provided your information and it not necessary for the provision of a service or functionality or a legal obligation, you can ask us to at any time to stop using this information. Please refer to section 2 for further information on when you can exercise this right.
- Right to Complaint: you have the right to complain for any alleged breach that should be reported to the appropriate authority. All requests shall be considered and responded to in compliance with applicable data protection legislation.
- Withdrawing Consent You have the right to withdraw your consent at any time, free of charge, such as where you wish to opt out from marketing messages that you receive from us.

However, if you withdraw your consent, we may not be able to provide certain Services to you, but we will notify you if this is the case at the time you withdraw your consent; nevertheless, this will not affect the lawfulness of any processing carried out before you withdraw your consent. How to exercise your rights

You can make a request to exercise any of those rights in relation to your personal data by sending the request to this email address hello@jada-ai.com.

For your own privacy and security, we may require you to prove your identity before providing the required information.

• Confidentiality and Security of Personal Data

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorized way.We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality.

We have also procedures in place to deal with any suspected data security breach.We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so, The security of your data is important to us, but remember that no method of transmission over the internet, or method of electronic storage is 100% secure.

There is a chance that an unauthorized third party will find a way to circumvent our security mechanisms or that the transmission of your information over the Internet will be intercepted. We will protect your Personal Data with industry-standard physical, technical, and administrative security measures, and we will not share it with third parties unless otherwise stated in this Privacy Notice, or unless disclosure is required by law in special circumstances, such as a physical threat to you or others. It is your duty to keep your log-in information secure.

Please keep in mind that most e-mail communications are not encrypted and should not be considered safe.

While any data shared over the internet carries a risk of being accidentally lost, misused, damaged, accessed in an unauthorized or unlawful manner, altered, or disclosed, we have put in place appropriate security measures to prevent your personal data from being accidentally lost, misused, damaged, accessed in an unauthorized or unlawful manner, altered, or disclosed. Furthermore, we restrict access to your personal data to employees, agents, contractors, and other third parties with a valid business need to know. They will only process your personal data in accordance with our instructions and are bound by strict confidentiality obligations.

We shall implement the following suitable security measures, depending on the extent of the risks caused by the proposed processing of your personal data:

- Availability, integrity, and accessibility of data on a long-term basis: include but not limited to ensuring appropriate back-ups of personal data are held).
- Company Endeavours: include, but not limited to, policy development and staff trainings; and
- Technical safeguards: include, but not limited to, physical security of Data, pseudonymization, and encryption). We have protocols in place to deal with any suspected personal data breach, and where we are legally required to do so, we will notify you and any applicable authority.
- Data retention We keep your Personal information for no longer than necessary, and for the purposes for which the information is collected and processed. We consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting, or other requirements when determining the appropriate retention period for personal data.

Here are some examples of the criteria we consider when considering how long we need to keep your personal information:

- in accordance with relevant industry standards or guidelines;
- because of our legitimate business necessity to prevent abuse of the promotions we run. To avoid the appearance of abusive behaviour, we shall save a customer's personal data for the duration of the offer and for a specific period after it has ended;
- if we have a reasonable expectation of litigation or any Alternative Dispute Resolution in connection with our relationship with you, or if we believe we need to keep information to defend possible future legal claims (e.g., email addresses and content, chats, and letters will be kept for up to 10 years following the end of our relationship, depending on the limitation period applicable in your country);
- in the event of a complaint;
- to comply with any applicable legal and/or regulatory requirements with respect to certain types of personal data:
- We are required to retain your personal data for a period of 5 years after the end of the relationship between us as a company and you as a customer, under EU anti-money laundering legislation (Anti-Money Laundering Directives); this period may be extended in certain circumstances if so, provided by and in accordance with the applicable legislation; the same is true under UK anti-money laundering legislation.
- if information is required for auditing and/or other purposes.
- Children's Privacy Our Site and Services are intended for a broad audience and are not meant for children under eighteen (18) years of age. As a result, in accordance with applicable legal and regulatory duties, we do not intentionally collect, use, solicit, or disclose personal information from children without first obtaining parental consent. We ask that you do not use our Site and Our Services if you are under the age of 18. We may request age-related information from you to comply with applicable legislation.

Upon learning of the existence of any Personal Data of persons under the age of 18 that has been collected on our Site without verified parental consent, we will take reasonable actions to remove such Personal Data with immediate effect upon the information coming into Jada Ai's notice.

• Links to Other Websites

We may include links to sites maintained by third parties other than Jada Ai ("Third Party Sites"), that we believe may be of interest to you. We only share your Personal Data with these Third-Party Sites if we have a legal basis for doing so.

As a result, we cannot guarantee the security or privacy of any information you supply when you visit such sites, and such sites are not subject to this privacy Policy. We do not endorse the Privacy Policies of these Third-Party Sites, and we are not responsible for them. If you choose to visit one of these Third-Party Sites, you should therefore read the privacy Policies on these third-party sites to see how they collect and use your Personal Data.

• Cookies and Other Tracking Technologies

Cookies and other tracking technologies (e.g., web beacons, device identifiers, and pixels) are used by Jada Ai and our third-party partners, such as our advertising and analytics partners, to offer functionality and to recognize users across multiple Services and devices.

We use cookies to track visitor activity on our Site to improve user experience, such as tracking pages viewed, how long someone stays on a webpage, whether error messages were received, remembering information you've provided to provide a more personalized experience, and storing username or related login credentials so you don't have to provide this information every time you visit the Site.

The only reason for collecting this data is to understand how our customers and the general public consume our services.

Updates to this Privacy Policy

Please keep in mind that we review our privacy practices on a regular basis and that they are subject to change. Return to this page on a regular basis to verify that you are familiar with the most recent version of this Privacy Policy. Any change, update, or modification will go into effect as soon as it is posted on our Site.

Any major modification to this Privacy Policy will be communicated to you by posting a notice on the homepage of our Site for a reasonable period following the amendment or by sending an email to the email address connected with your user account, if necessary.

We will equally amend the effective date to reflect the latest date of the amendment.

• Questions and Complaints

Please contact us at <u>hello@jada-ai.com</u> or mail us using the address below if you have any questions, requests, or complaints regarding how we process your personal information.

3411 Silverside Road Tatnall Building #104, Wilmington, New Castle, Delaware, 19810, USA

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union state where your work, normally live or where any alleged infringement of data protection laws occurred.