

PRIVACY POLICY

Zia.ai Inc (“**Zia**”) offers a powerful AI to your existing chat platform through its extension HumanFirst. Zia is committed to protecting the privacy and security of your personal information in accordance with applicable law. To that end, this privacy policy describes how we collect, use and disclose your personal information and how this personal information can be consulted and corrected if necessary.

By visiting the website <<https://www.humanfirst.ai/>>, by using our extension HumanFirst (the “**Website**”) or any related services (collectively the “**Services**”), by contacting us or agreeing to receive emails from Zia, you accept the terms and conditions of this policy.

This policy does not extend to websites operated by third parties. Zia has no control over, and is therefore not liable for, their privacy policies, procedures and practices regarding the protection of personal information.

1. Collection of Personal Information

We collect different types of information from or through the Services. The legal bases for our processing of personal information are primarily that the processing is necessary for providing/improving the Services and that the processing is carried out in our legitimate interests, which are further explained in the “Use and Communication of Personal Information” section. We may also process personal information upon your consent, asking for it as appropriate.

a) Information You Provide

We may collect personal information that you provide to our Services when you register for an account or that you provide to us in some other manner, including your name, email address, phone number, billing information, user name and password, when you register for our Services, request a demo or contact us for information about our Services.

b) Data Related to Use of the Services

In order to perform the Services, we may collect your “**Data**”, i.e. any data and content you transmit to our Services or that is otherwise made available via the Services, including messages you send, communications, documents, links and anything else you enter or upload into the Services. For greater certainty, Data includes telemetry data, i.e. information we collect that tells us how our Services are performing and being used (e.g. information about when and how long Services are used, which features are accessed, information about hardware, software, and other details gathered related to usage, authentication, diagnostics, errors encountered, or the condition of the device and the Services when an error occurred, etc.). Data may contain personal information about you or from or about your end users. In all of these cases, because our Services have been integrated into your product or application, you acknowledge and agree that

you are solely responsible for the Data, including for obtaining all required valid consents from end users in connection with any use of our Services.

c) Information We Receive From Social Networking Sites

When you interact with our site through various social media, such as when you login through or interact with us on Facebook, or other social media, we may receive information from the social network including your profile information, profile picture, gender, user name, user ID associated with your social media account, age, language, country, friends/followers list, and any other information you permit the social network to share with third parties. The information we receive is dependent upon your privacy settings with the social network. You should always review, and if necessary, adjust your privacy settings on third-party websites and services before linking or connecting them to our Website or Services.

d) Information Automatically Collected

We automatically collect certain types of usage information when you visit our Website or use our Services. When you visit the Website, we may send one or more cookies — a small text file containing a string of alphanumeric characters — to your computer that uniquely identifies your browser and lets us help you log in faster and enhance your navigation through the site. A cookie may also convey information to us about how you use the Services (e.g. the pages you view, the links you click, how frequently you access the Services, and other actions you take on the Services), and allow us to track your usage of the Services over time. We may collect log file information from your browser or mobile device each time you access the Services. Log file information may include anonymous information such as your web request, Internet Protocol (“IP”) address, browser type, information about your mobile device, referring/exit pages and URLs, number of clicks and how you interact with links on the Services, domain names, landing pages, pages viewed, and other such information. We may employ clear gifs (also known as web beacons) which are used to anonymously track the online usage patterns of our users. In addition, we may also use clear gifs in HTML-based emails sent to our users to track which emails are opened and which links are clicked by recipients. The information allows for more accurate reporting and improvement of the Services. We may also collect analytics data, or use third-party analytics tools, to help us measure traffic and usage trends for the Services. These tools collect information sent by your browser or mobile device, including the pages you visit, your use of third party applications, and other information that assists us in analyzing and improving the Services.

2. Use and Communication of Personal Information

We take steps designed to ensure that only the employees who need access to your personal information to fulfil their employment duties will have access to it.

We use and disclose your personal information and Data mainly: (i) to identify you as a member of Zia; (ii) to provide the relevant Services; (iii) to improve on an ongoing basis the quality of Zia Website and Services; (iv) to investigate and settle issues you may have; (v) to follow up on any questions or requests for assistance or information; (vi) to communicate with you; and (vii) to comply with legal and regulatory requirements, where applicable.

Zia may share your personal information and Data with: (a) its affiliates; (b) its third party service providers, such as payment processors and IT consultants, who need such information to provide the relevant services to Zia and who agree not to use such information for any other purposes; (c) law enforcement and governmental entities when required by law; and (d) to third parties in connection with the change of ownership, sale, merger, liquidation, reorganization or acquisition of Zia, in whole or in part, in which case Zia will require any such third party to agree to treat personal information in accordance with this Privacy Policy.

When we disclose your personal information to third parties, we take reasonable measures to ensure that the rules set forth in this Privacy Policy are complied with and these third parties provide sufficient guarantees to implement appropriate technical and organisational measures.

We may also share information with others in an aggregated and anonymous form that does not reasonably identify you directly as an individual.

3. Retention of Personal Information

Your personal information will be stored or processed in any country where we have facilities or in which we engage service providers. By using our Website and Services, you consent to the transfer of information to countries outside your country of residence, including the United States, which may have different data protection rules than in your country. While such information is outside of Canada, it is subject to the laws of the country in which it is held, and may be subject to disclosure to the governments, courts or law enforcement or regulatory agencies of such other country, pursuant to the laws of such country. However, our practices regarding your personal information will at all times continue to be governed by this Privacy Policy and, if applicable, we will comply with the *General Data Protection Regulation* (“GDPR”) requirements providing adequate protection for the transfer of Personal Information from the EU/EEA to third country.

Zia has implemented various physical, administrative, and technical safeguards designed to protect the confidentiality and security of personal information under our control. However, no security measures are absolute or wholly guaranteed and you must be aware that there is always a certain level of risk that the personal information you provide to us will be disclosed without your consent and without fault on the part of Zia. If you believe your personal information has been compromised, please contact us as set forth in the “Contact Person” section. If we learn of a security systems breach, we will inform you and the authorities of the occurrence of the breach in accordance with applicable law.

We will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Policy and in order to comply with our legal and regulatory obligations. If you would like further information regarding the periods for which your personal information will be kept, please contact us as set forth in the “Contact Person” section.

4. Rights Regarding Personal Information

On written request and subject to proof of identity, you may access the personal information that we held, used or communicated and ask that any necessary corrections be made, where applicable, to the extent authorized or required by law. However, to make sure that the personal information we maintain about you is accurate and up to date, please inform us immediately of any change in your information by mail or e-mail.

Under the GDPR, you may be entitled to specific rights, including: (i) the right to withdraw consent to processing where consent is the basis of processing; (ii) the right to access your personal information and certain other supplementary information, under certain conditions; (iii) the right to object to unlawful data processing, under certain conditions; (iv) the right to erasure of personal information about you, under certain conditions; (v) the right to demand that we restrict processing of your personal information, under certain conditions, if you believe we have exceeded the legitimate basis for processing, processing is no longer necessary, or believe your personal information is inaccurate; (vi) the right to data portability of personal information that you provided us in a structured, commonly used, and machine-readable format, under certain conditions; (vii) the right object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you, under certain conditions; (viii) the right to lodge a complaint with data protection authorities. If you want to learn more about your rights under the GDPR, you can visit the European Commission's page on Data Protection at: http://ec.europa.eu/justice/data-protection/index_en.htm.

1. Children's Privacy

The Services are not directed to children under the age of 16, and we do not knowingly collect personal information from children under the age of 16 without obtaining parental consent. If you are under 16 years of age, then please do not use or access the Services at any time or in any manner. If we learn that Personal Information has been collected on the Services from persons under 16 years of age and without verifiable parental consent, then we will take the appropriate steps to delete this information. If you are a parent or guardian and discover that your child under 16 years of age has provided personal information, then you may alert us as set forth in the "Contact Person" section and request that we delete that child's personal information from our systems.

5. Update

We will update this Privacy Policy from time to time to reflect changes to our practices, technologies, legal requirements and other factors. Please check the "Last Updated" legend at the bottom of this page to see when this Privacy Policy was last updated. When changes are made to this Privacy Policy, they will become immediately effective when published in an updated Privacy Policy posted on this page unless otherwise noted. Your use of the Website and Services following these changes indicates your consent to the practices described in the updated Privacy Policy.

6. Contact Person

If you have any concerns about our practices or policies, to make an access or correction request, to exercise any applicable rights, to make a complaint, or to obtain information about our policies and practices with respect to any service providers outside Canada, our Privacy Officer can be reached by mail or email using the following contact information:

Zia.ai Inc
7345, rue Maynard
Montréal (Québec) H3R3B3
Canada
privacy@zia.ai

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