PRIVACY POLICY

Last updated September 24, 2026

This Privacy Notice for Paleon BV ("**we**," "**us**," or "**our**"), describes how and why we might access, collect, store, use, and/or share ("**process**") your personal information when you use our services ("**Services**"), including when you:

- Download and use our mobile application (Paleon), or any other application of ours that links to this Privacy Notice
- Use Paleon. Paleon is a mobile learning and nature identification app that helps users learn about the natural world through short interactive lessons, AI-powered identification, educational articles, and personalized learning features. Users can identify plants, animals, fossils, fungi, rocks, shells, and other natural objects from photos, ask follow-up questions using an AI Tutor, track their learning progress, save content, and access premium features through a subscription. Paleon also provides educational nature and science news and other interactive learning tools.
- Engage with us in other related ways, including any marketing or events

Questions or concerns? Reading this Privacy Notice will help you understand your privacy rights and choices. We are responsible for decisions about how your personal information is processed. This notice explains our practices; using our Services does not, by itself, constitute consent to processing that requires consent or a waiver of your legal rights. For questions or concerns, contact support@paleonofficial.com.

SUMMARY OF KEY POINTS

This summary provides key points from our Privacy Notice, but you can find out more details about any of these topics by clicking the link following each key point or by using our table of contents below to find the section you are looking for.

What personal information do we process? When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us and the Services, the

choices you make, and the products and features you use. Learn more about personal information you disclose to us.

Do we process any sensitive personal information? We do not ask you to provide sensitive information, such as health information or religious beliefs, for ordinary use of Paleon. Text and images submitted by users can nevertheless contain such information. Please avoid including unnecessary sensitive information. See section 1.

Do we collect any information from third parties? Yes. We receive information from Google and Apple when you use their sign-in services and purchase or subscription information from Apple, Google and RevenueCat.

How do we process your information? We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so. Learn more about how we process your information.

In what situations and with which parties do we share personal information? We may share information in specific situations and with specific third parties. Learn more about when and with whom we share your personal information.

How do we keep your information safe? We have adequate organizational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Learn more about how we keep your information safe.

What are your rights? Your rights depend on the data protection laws applicable to the processing, not only on where you live. This includes the GDPR where it applies to processing in the context of Paleon BV's establishment in the Netherlands. Learn more in section 11.

How do you exercise your rights? The easiest way to exercise your rights is by visiting https://paleon.store/pages/contact, or by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

Want to learn more about what we do with any information we collect? Review the Privacy Notice in full.

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1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

In Short: *We collect personal information that you provide to us.*

We collect personal information that you voluntarily provide to us when you register on the Services, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

Personal Information Provided by You. The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- names
- email addresses
- usernames
- contact preferences
- contact or authentication data
- profile pictures
- photos uploaded for identification
- AI Tutor messages / questions
- feedback or support messages
- learning preferences / onboarding answers

Sensitive Information. We do not request sensitive information for ordinary use of Paleon. Please avoid unnecessary sensitive data in uploads or messages.

Payment Data. In-app payments are processed by Apple or Google. RevenueCat manages purchase records, subscription status and access to paid features; it is not the app-store card-payment processor. Paleon does not receive your complete payment card number or card security code through these in-app purchases. Provider privacy notices: https://www.apple.com/legal/privacy/, https://policies.google.com/privacy and https://www.revenuecat.com/privacy.

Payments and subscriptions are processed by third-party app store providers. Paleon does not directly collect or store users' complete payment card information. We may receive purchase, subscription, transaction, entitlement, and related account information from Apple, Google, and RevenueCat in order to manage subscriptions and provide access to paid features.

Social Media Login Data. You can register or log in using Google Sign-In or Sign in with Apple. If you choose either option, we receive the account identifier and the profile or authentication information made available for that sign-in, as explained in section 7, "HOW DO WE HANDLE YOUR SOCIAL LOGINS?"

Application Data. The information below is processed when the corresponding app features are used. Access to device features requiring permission depends on the permission you grant.

- *Mobile Device Access.* We may request access or permission to certain features from your mobile device, including your mobile device's camera, and other features. If you wish to change our access or permissions, you may do so in your device's settings.
- **Mobile Device Data.** We and our integrated providers process technical information such as app and operating-system versions, device model, app or device identifiers and IP addresses, as described below.

This technical information supports delivery, security, diagnostics and the integrated services. It may be associated with account or device identifiers. It is not the same as inspecting the content of your unrelated internet traffic. App-use events and advertising interactions are described under "Log and Usage Data" and "Advertising and Advertising Identifiers" below.

- **Push Notifications.** We use OneSignal to deliver notifications. This involves push tokens, app or device information and notification-related data. You can turn off push notifications in your device's settings. Turning off notifications does not necessarily delete existing provider records.

This information is primarily needed to maintain the security and operation of our application(s), for troubleshooting, and for our internal analytics and reporting purposes.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

Information automatically collected

In Short: *Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Services.*

We and the providers integrated into our Services automatically process technical information, including IP addresses, app or browser characteristics, device identifiers, operating-system information and information about use of the Services. These data can be personal information even without a name and may be linked to an account or device. The processing supports service delivery, security, diagnostics, analytics and advertising, as explained in this notice. Location-related processing is described separately below.

The information we collect includes:

- **Log and Usage Data.** Our Services and integrated providers process service-related, diagnostic, usage and performance information. This includes technical request logs and, depending on the service and configuration, app launches, event timestamps, feature interactions, ad views or taps, and error information. PostHog and AdMob are used for the analytics and advertising functions described in this notice. In privacy-law categories, app and ad interactions can be "internet or other similar network activity." This does not mean that Paleon inspects the contents of your unrelated internet traffic.

- **Device Data.** We and our integrated service providers process technical information about the device used to access the Services. Depending on the service and its configuration, this includes IP addresses, app and device identifiers, hardware model, app or browser version, operating system and configuration information. These data support the purposes described in section 2.

- **Location-related Information.** Paleon does not request device-location permission or use GPS to track your location. This does not exclude approximate location processing by integrated providers: IP addresses may be used to estimate a country or region, including in connection with AdMob. This is different from GPS tracking. Location details you choose to include in text or images may also be processed as part of that submission. Disabling device-location permission does not prevent IP-based processing.

- *Advertising and Advertising Identifiers*. Advertising identifiers, ad impressions, ad interactions, attribution information, and related data used to display, measure, and improve advertising.
- *Purchase and Subscription Data*. Subscription status, purchase history, product identifiers, transaction identifiers, entitlements, and related information used to manage purchases and subscriptions.

Google API

Our use of information received from Google APIs will adhere to Google API Services User Data Policy, including the Limited Use requirements.

2. HOW DO WE PROCESS YOUR INFORMATION?

In Short: *We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We process the personal information for the following purposes listed below. We may also process your information for other purposes only with your prior explicit consent.*

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- **To facilitate account creation and authentication and otherwise manage user accounts.** We may process your information so you can create and log in to your

account, as well as keep your account in working order. (Retention period: For as long as the user maintains an account with us, and for up to 90 days after account deletion where necessary for backups, security, or account administration.)

- **To deliver and facilitate delivery of services to the user.** We may process your information to provide you with the requested service. (Retention period: For as long as the user maintains an account with us, or until the information is no longer necessary to provide the requested service.)
- **To respond to user inquiries/offer support to users.** We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service. (Retention period: For up to 24 months after the inquiry has been resolved, unless a longer period is necessary for legal or dispute-resolution purposes.)
- **To send administrative information to you.** We may process your information to send you details about our products and services, changes to our terms and policies, and other similar information. (Retention period: For as long as the user maintains an account with us and as necessary to document important service, account, subscription, or legal communications.)
- **To fulfill and manage your orders.** We may process your information to manage purchases, subscriptions, payments and related support. (Retention period: For as long as needed to manage the purchase or subscription. Only records required for tax or accounting are retained for the applicable statutory period; other purchase-related personal information is not automatically kept for that entire period.)

- **To request feedback.** We may process your information when necessary to request feedback and to contact you about your use of our Services. (Retention period: For as long as necessary to collect and evaluate the feedback, and generally no longer than 24 months.)
- **To protect our Services.** We may process your information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention. (Retention period: For up to 12 months, or longer where necessary to investigate fraud, abuse, security incidents, or comply with legal obligations.)
- **To identify usage trends.** We may process information about how you use our Services to understand and improve them. (Retention period: Up to 24 months, followed by deletion or irreversible anonymization. Aggregation does not end this retention limit if individuals can still be identified.)

- **To save or protect an individual's vital interest.** We may process your information when necessary to save or protect an individual’s vital interest, such as to prevent harm.

- **Account and subscription management.** To create and manage user accounts, authenticate users, maintain learning progress and saved content, and provide access to subscription features and entitlements.
- **Service improvement and analytics.** To analyze interactions with Paleon, understand usage patterns, diagnose technical issues, improve features and maintain reliability and performance.
- **Advertising and communications.** To display and measure ads and send service or promotional messages, subject to the applicable legal basis and consent requirements.

3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

In Short: *We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e., legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfill our contractual obligations, to protect your rights, or to fulfill our legitimate business interests.*

This section applies where the EU GDPR or UK GDPR governs the processing, including processing in the context of Paleon BV's EU establishment.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- **Consent.** Where required, processing takes place with your consent, including relevant advertising or analytics tracking. You may withdraw consent as easily as you gave it. Service use alone is not consent. See section 11.
- **Performance of a Contract.** We may process your personal information when we believe it is necessary to fulfill our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.
- **Legitimate Interests.** Processing on this basis must be necessary for a legitimate purpose and not overridden by your interests or fundamental rights and freedoms. This basis does not replace consent where device-storage or tracking rules require it. Subject to that assessment, purposes include:

    - Analyze how our Services are used so we can improve them to engage and retain users
    - Diagnose problems and/or prevent fraudulent activities

    - Understand how our users use our products and services so we can improve user experience
    - Improve, maintain, secure, and optimize Paleon and understand how our services are used.
- **Legal Obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
- **Vital Interests.** We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

If you are located in Canada, this section applies to you.

We may process your information if you have given us specific permission (i.e., express consent) to use your personal information for a specific purpose, or in situations where your permission can be inferred (i.e., implied consent). You can withdraw your consent at any time.

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, for example:

- If collection is clearly in the interests of an individual and consent cannot be obtained in a timely way
- For investigations and fraud detection and prevention
- For business transactions provided certain conditions are met
- If it is contained in a witness statement and the collection is necessary to assess, process, or settle an insurance claim
- For identifying injured, ill, or deceased persons and communicating with next of kin
- If we have reasonable grounds to believe an individual has been, is, or may be victim of financial abuse
- If it is reasonable to expect collection and use with consent would compromise the availability or the accuracy of the information and the collection is reasonable

for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province

- If disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records
- If it was produced by an individual in the course of their employment, business, or profession and the collection is consistent with the purposes for which the information was produced
- If the collection is solely for journalistic, artistic, or literary purposes
- If the information is publicly available and is specified by the regulations
- We may disclose de-identified information for approved research or statistics projects, subject to ethics oversight and confidentiality commitments

4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

In Short: *We may share information in specific situations described in this section and/or with the following third parties.*

Vendors, Consultants, and Other Third-Party Service Providers. We may share your data with third-party vendors, service providers, contractors, or agents ("**third parties**") who perform services for us or on our behalf and require access to such information to do that work.

The third parties we may share personal information with are as follows:

- **Advertising, Direct Marketing, and Lead Generation**

  AdMob

- **AI Service Providers**

  OpenAI, DeepSeek and Google Cloud AI

- **Allow Users to Connect to Their Third-Party Accounts**

  Google account and Apple account

- **Push Notifications and User Communications**

  OneSignal

- **Purchases and Subscription Management**

RevenueCat; Apple App Store and Google Play

- **User Communications and Marketing**

Customer.io

- **User Account Registration and Authentication**

Google Sign-In and Sign in with Apple

- **Web and Mobile Analytics**

PostHog

- **Cloud Hosting, Backend and Database Services**

Railway, Supabase, Vercel and Google Cloud

- **Website Hosting and Performance Monitoring**

Framer

We also may need to share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your 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.

5. WHAT IS OUR STANCE ON THIRD-PARTY WEBSITES?

In Short: External websites and services you choose to visit have their own privacy practices. This section does not exclude Paleon's legal responsibilities for its own processing or for providers processing information on its behalf.

The Services may link to third-party websites, online services or mobile applications, including through advertisements. These external services may have their own terms and privacy notices. A link does not imply our endorsement, and we do not guarantee the accuracy, security or availability of independently operated websites. Please review the relevant third party's privacy information before providing it with personal information.

This explanation concerns independently operated services you visit, not a transfer of all responsibility for the providers integrated into Paleon. Information processed on our behalf remains subject to our applicable legal obligations. Nothing in this Privacy Notice excludes liability that cannot lawfully be excluded, limits your mandatory privacy or consumer rights, or prevents a complaint to a regulator or a court.

6. DO WE OFFER ARTIFICIAL INTELLIGENCE-BASED PRODUCTS?

In Short: *We offer products, features, or tools powered by artificial intelligence, machine learning, or similar technologies.*

As part of our Services, we offer products, features, or tools powered by artificial intelligence, machine learning, or similar technologies (collectively, "AI Products"). These tools are designed to enhance your experience and provide you with innovative solutions. The terms in this Privacy Notice govern your use of the AI Products within our Services.

Use of AI Technologies

We provide AI Products through third-party services, including DeepSeek, OpenAI and Google Cloud AI. Depending on the feature and provider used for a request, submitted text, images, relevant conversation context and related technical information are processed to generate the requested response or identification. Listing several providers does not mean every request is sent to all of them. Processing is subject to the applicable legal basis described in section 3. You must not use these features in a way that violates applicable service terms or law.

Our AI Products

Our AI Products are designed for the following functions:

- Image analysis
- Text analysis
- Natural language processing

How We Process Your Data Using AI

AI requests are processed for the purposes explained in this notice. Provider-side logging, retention and any use for model training depend on the service and applicable configuration and terms. This notice is not a blanket authorization for unrelated provider use or a guarantee that every provider offers zero retention or no training.

Your choices when using AI features

AI-powered features are optional, but a request cannot be answered without processing its necessary input. There is no setting that allows you to use the AI Tutor or image identification while preventing that necessary processing. To avoid submitting information for an AI request, do not use these features.

This does not remove rights of access, deletion, objection or withdrawal of consent where applicable. Necessary AI processing is distinct from optional advertising, analytics or any separate use for model training.

7. HOW DO WE HANDLE YOUR SOCIAL LOGINS?

In Short: When you register or log in using Google Sign-In or Sign in with Apple, we receive information needed to authenticate you and manage your account.

Paleon supports Google Sign-In and Sign in with Apple. Depending on the provider and information made available for your sign-in, we receive an account identifier, email address and, where provided, your name and Google profile picture. Apple may supply a private relay email address when you choose Hide My Email. We do not receive your Google or Apple password through these sign-in services, and they do not provide us with your friends list.

We use this information for the purposes described in this notice, including authentication and account management. Google and Apple also process information for their own services under their respective privacy notices. Please review those notices for their independent practices and account controls. This does not limit our responsibilities for information we receive and process.

8. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?

In Short: *We may transfer, store, and process your information in countries other than your own.*

Paleon uses managed infrastructure and other services, including Railway, Supabase, Vercel and RevenueCat, rather than operating all of the relevant data centers itself. Personal information is processed in the United States and may also be processed in other countries used by the relevant provider, selected project region or authorized subprocessors. Storage, support access and onward processing locations may differ. These arrangements do not remove Paleon's data-protection responsibilities.

Countries outside the EEA, UK or Switzerland may provide different legal protections. Transfers governed by the applicable data protection law require a valid transfer mechanism where one is required. Using a cloud provider or informing you about an overseas transfer does not, by itself, satisfy that requirement.

Applicable International Transfer Safeguards

Depending on the recipient and applicable law, a transfer mechanism may be an adequacy decision, including an applicable Data Privacy Framework certification, or contractual safeguards such as the European Commission's Standard Contractual Clauses. UK transfers may require the UK Addendum or another permitted UK mechanism. The required safeguards and any supplementary measures must cover the actual transfer.

You may contact us at support@paleonofficial.com for information about relevant recipients, processing countries and the safeguards applicable to your information, including a copy of applicable contractual safeguards subject to lawful redactions.

9. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: *We keep your information for as long as necessary to fulfill the purposes outlined in this Privacy Notice unless otherwise required by law.*

We retain personal information only for as long as necessary for the purposes described in this notice, subject to applicable legal requirements. Retention periods by purpose are set out in section 2. An exception for legal records applies only to the records needed for that obligation, not automatically to an entire account or all uploaded content.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

10. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: *We aim to protect your personal information through a system of organizational and technical security measures.*

We use technical and organizational measures designed to protect personal information, taking account of the nature of the processing and the risks involved. No electronic transmission or storage system can be guaranteed to be completely secure. Safeguards reduce risk but cannot guarantee that unauthorized access, loss or misuse will never occur.

Please protect your account credentials and use secure devices. This does not shift our legal security obligations to you. Nothing in this notice excludes responsibility or remedies that applicable law does not permit us to exclude.

11. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: You have the rights provided by the data protection laws applicable to our processing. These may include access, correction, deletion, restriction, portability, objection and withdrawal of consent. The GDPR can apply to processing in the context of Paleon BV's establishment in the Netherlands regardless of your nationality or residence. Additional regional rights are explained below.

In some regions (like the EEA, UK, Switzerland, and Canada), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; (iv) if applicable, to data portability; and (v) not to be subject to automated decision-making. If a decision that produces legal or similarly significant effects is made solely by automated means, we will inform you, explain the main factors, and offer a simple way to request human review. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us by using the contact details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below.

We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in the UK and are unhappy with how we have handled your personal information, you can make a complaint directly to us. This is in addition to the rights you have under the UK General Data Protection Regulation and the Data Protection Act 2018.

How to contact us:

- **Online:** https://paleon.store/pages/contact
- **Email:** support@paleonofficial.com
- **Post:** See "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?"

What happens after you complain

- We will acknowledge your complaint within 30 days of receiving it.
- We will investigate without unjustifiable or excessive delay.
- We will keep you informed of progress and explain the outcome.

If you are not happy with our final response, you can refer your complaint to the Information Commissioner's Office, the UK supervisory authority.

- **Website:** ico.org.uk/make-a-complaint
- **Helpline:** 0303 123 1113
- **Post:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your Member State data protection authority or UK data protection authority.

If you are located in Switzerland, you may contact the Federal Data Protection and Information Commissioner.

Withdrawing your consent: If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Opting out of marketing and promotional communications: You can unsubscribe from our marketing and promotional communications at any time by clicking on the unsubscribe link in the emails that we send, or by contacting us using the details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below. You will then be removed from the marketing lists. However, we may still communicate with you — for example, to send you service-related messages that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes.

Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Use your account settings, or submit a request through our contact form.

On a valid deletion request, we delete personal information from active systems unless a specific legal exception applies. Deactivation alone is not a substitute for deletion. Any retained information is limited to the relevant purpose; backup copies are isolated from ordinary use and removed through the applicable deletion cycle. See sections 2 and 9.

If you have questions or comments about your privacy rights, you may email us at support@paleonofficial.com.

12. CONTROLS FOR DO-NOT-TRACK FEATURES

Some browsers and devices offer a legacy Do-Not-Track (DNT) setting. Paleon does not currently respond to that legacy DNT signal.

DNT is different from legally recognized opt-out preference signals, such as Global Privacy Control (GPC). Where applicable law requires honoring such a signal, that requirement is not excluded by our treatment of DNT. You can also contact us about applicable privacy choices using the details in this notice. A contact route does not replace a signal or automated control that the law requires us to honor.

Where disclosure of our response to legacy browser DNT is required, our response is as described above. This does not exclude any separate obligation to honor legally recognized opt-out preference signals.

13. DO UNITED STATES RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

In Short: *If you are a resident of California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, or Virginia, you may have the right to request access to and receive details about the personal information we maintain about you and how we have processed it, correct inaccuracies, get a copy of, or delete your personal information. You may also have the right to withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law. More information is provided below.*

Categories of Personal Information We Collect

The table below shows the categories of personal information we have collected in the past twelve (12) months. The table includes illustrative examples of each category and does not reflect the personal information we collect from you. For a comprehensive inventory of all personal information we process, please refer to the section "WHAT INFORMATION DO WE COLLECT?"

Category	Examples	Collected
A. Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name	YES
B. Personal information as defined in the California Customer Records statute	Name, contact information, education, employment, employment history, and financial information	YES

C. Protected classification characteristics under state or federal law	Gender, age, date of birth, race and ethnicity, national origin, marital status, and other demographic data	NO
D. Commercial information	Transaction information, purchase history, financial details, and payment information	YES
E. Biometric information	Fingerprints and voiceprints	NO
F. Internet or other similar network activity	App-use events, diagnostic information and advertising interactions. This is not inspection by Paleon of unrelated internet traffic.	YES
G. Geolocation data	Approximate location inferred from IP addresses by integrated providers; no GPS tracking by Paleon. See section 1.	See note*
H. Audio, electronic, sensory, or similar information	Profile pictures and photos submitted for identification. This does not mean that audio or call recordings are collected.	YES
I. Professional or employment-related information	Business contact details in order to provide you our Services at a business level or job title, work history, and professional qualifications if you apply for a job with us	NO
J. Education Information	Student records and directory information	NO
K. Inferences drawn from collected personal information	Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual’s preferences and characteristics	NO

L. Sensitive personal Information		See sec. 1

** No GPS tracking by Paleon; see section 1 for possible provider-side approximate location.*

We may also collect other personal information outside of these categories through instances where you interact with us in person, online, or by phone or mail in the context of:

- Receiving help through our customer support channels;
- Participation in customer surveys or contests; and
- Facilitation in the delivery of our Services and to respond to your inquiries.

We use and retain information for the relevant purposes in sections 2 and 9:

- **Categories A and B:** Account-related information while the account is maintained, plus up to 90 days after deletion only where needed for protected backups or other justified purposes. Identifiers in analytics or legal records follow that specific purpose, not automatically the lifetime of the account.
- **Category D:** For purchase or subscription administration and the applicable legal, tax, accounting or dispute-related period for the relevant records.
- **Categories F and G:** For the relevant analytics, advertising or security purpose. Our analytics limit is up to 24 months; retained technical logs follow the security purpose. Provider processing is addressed in sections 4 and 8.
- **Category H:** For the requested identification or saved-content feature, until no longer needed or a valid deletion request applies, subject to specific lawful retention exceptions.

Sources of Personal Information

Learn more about the sources of personal information we collect in "WHAT INFORMATION DO WE COLLECT?"

How We Use and Share Personal Information

Learn more about how we use your personal information in the section, "HOW DO WE PROCESS YOUR INFORMATION?"

Will your information be shared with anyone else?

We disclose information to the providers listed in section 4 for the purposes described there. Their legal roles depend on the actual service and processing. Where binding data-processing terms are required, they must govern the disclosure; such terms may form part of an accepted online agreement rather than a separately signed document.

We may use personal information for internal product research and development on the applicable legal basis. Whether a disclosure is a sale or sharing depends on the law and actual processing, not simply its description as a business purpose.

We do not sell personal information for money. Advertising-related disclosure of identifiers or app/ad interactions may nevertheless constitute "sharing" under California law or targeted advertising under other state laws. The actual service, configuration and legal conditions determine this; using a vendor does not automatically provide an exemption.

Information disclosed for the services described in this notice includes:

- Categories A and B: identifiers and customer-record information.
- Category D: purchase and subscription information.
- Categories F and G: app/ad interactions and provider-side approximate location (section 1).
- Category H: images processed for profile and identification features.

See section 4 for providers and below for applicable opt-out rights.

Your Rights

You have rights under certain US state data protection laws. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law. These rights include:

- **Right to know** whether or not we are processing your personal data
- **Right to access** your personal data
- **Right to correct** inaccuracies in your personal data
- **Right to request** the deletion of your personal data
- **Right to obtain a copy** of the personal data you previously shared with us
- **Right to non-discrimination** for exercising your rights
- **Right to opt out** of the processing of your personal data if it is used for targeted advertising (or sharing as defined under California's privacy law), the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects ("profiling")

Depending upon the state where you live, you may also have the following rights:

- Right to access the categories of personal data being processed (as permitted by applicable law, including the privacy law in Minnesota)

- Right to obtain a list of the categories of third parties to which we have disclosed personal data (as permitted by applicable law, including the privacy law in California, Delaware, and Maryland)
- Right to obtain a list of specific third parties to which we have disclosed personal data (as permitted by applicable law, including the privacy law in Minnesota and Oregon)
- Right to obtain a list of third parties to which we have sold personal data (as permitted by applicable law, including the privacy law in Connecticut)
- Right to review, understand, question, and depending on where you live, correct how personal data has been profiled (as permitted by applicable law, including the privacy law in Connecticut and Minnesota)
- Right to limit use and disclosure of sensitive personal data (as permitted by applicable law, including the privacy law in California)
- Right to opt out of the collection of sensitive data and personal data collected through the operation of a voice or facial recognition feature (as permitted by applicable law, including the privacy law in Florida)

How to Exercise Your Rights

To exercise these rights, visit https://paleon.store/pages/contact, email support@paleonofficial.com, or use the postal details in section 17.

Under certain US state data protection laws, you can designate an authorized agent to make a request on your behalf. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with applicable laws.

Request Verification

For requests requiring identity verification, we use information reasonably necessary to verify your identity or authority and protect against unauthorized disclosure. Additional information is requested only where proportionate and permitted by law, and is used for verification and related security purposes. We do not require identity verification for an opt-out request where applicable law prohibits doing so.

If you submit the request through an authorized agent, we may need to collect additional information to verify your identity before processing your request and the agent will need to provide a written and signed permission from you to submit such request on your behalf.

Appeals

Under certain US state data protection laws, if we decline to take action regarding your request, you may appeal our decision by emailing us at support@paleonofficial.com. We will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If your appeal is denied, you may submit a complaint to your state attorney general.

California "Shine The Light" Law

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us by using the contact details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?"

14. DO OTHER REGIONS HAVE SPECIFIC PRIVACY RIGHTS?

In Short: *You may have additional rights based on the country you reside in.*

Australia and New Zealand

Where Australia's Privacy Act 1988 or New Zealand's Privacy Act 2020 applies to our processing, your information is subject to the rights and obligations of that law. This notice describes the information collected, its sources, purposes and recipients. It does not replace those statutory requirements.

If you do not wish to provide the personal information necessary to fulfill their applicable purpose, it may affect our ability to provide our services, in particular:

- offer you the products or services that you want
- respond to or help with your requests
- manage your account with us
- confirm your identity and protect your account

At any time, you have the right to request access to or correction of your personal information. You can make such a request by contacting us by using the contact details provided in the section "HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?"

If you believe we are unlawfully processing your personal information, you have the right to submit a complaint about a breach of the Australian Privacy Principles to the Office of the Australian Information Commissioner and a breach of New Zealand's Privacy Principles to the Office of New Zealand Privacy Commissioner.

Republic of South Africa

At any time, you have the right to request access to or correction of your personal information. You can make such a request by contacting us by using the contact details provided in the section "HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?"

If you are unsatisfied with the manner in which we address any complaint with regard to our processing of personal information, you can contact the office of the regulator, the details of which are:

The Information Regulator (South Africa)
General enquiries: enquiries@inforegulator.org.za
Complaints (complete POPIA/PAIA form 5): PAIAComplaints@inforegulator.org.za & POPIAComplaints@inforegulator.org.za

15. AI-POWERED FEATURES AND IMAGE IDENTIFICATION

Paleon offers AI-powered features, including an AI Tutor and image identification. We submit relevant text, images and prompts to the AI services used for the requested feature. Section 6 explains this processing and your choices. AI-generated responses and identifications may be inaccurate, incomplete or incorrect and should not be relied upon as professional, medical,

veterinary, toxicological, safety, or other expert advice. Do not rely solely on an AI identification for decisions about edibility, toxicity or safe handling. To avoid submitting information for AI processing, do not use these features. Your mandatory legal rights remain unaffected.

16. DO WE MAKE UPDATES TO THIS NOTICE?

In Short: *Yes, we will update this notice as necessary to stay compliant with relevant laws.*

We may update this Privacy Notice from time to time. The updated version will be indicated by an updated "Last updated" date at the top. If we make material changes, we will provide notice and obtain any additional consent where required by applicable law. We encourage you to review this notice to stay informed about how we process and protect personal information.

17. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at support@paleonofficial.com or contact us by post at:

Paleon BV
van Beuningenstraat 13
2676 CX Maasdijk, Zuid-Holland
Netherlands

18. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Under the data protection laws applicable to our processing, you may have the right to request access, information about processing, correction, deletion, restriction or portability, and to object or withdraw consent where applicable. These rights are subject to the relevant legal conditions and exceptions, not only your country of residence. To submit a request, visit https://paleon.store/pages/contact or email support@paleonofficial.com. See section 11 for more information.

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