



Dragonfly AI Privacy Policy

Last updated October 13, 2019.

If you are a visitor to a Dragonfly AI Website, a recipient of Dragonfly AI communications or a customer of a Dragonfly AI Service then except as expressly set forth below, this Privacy Policy applies to your use of such Website or Service.

If you are a customer of Dragonfly AI, the terms of use of the services provided to you are set out in a separate agreement with us for the provisioning of the Services (“**Terms of Service**”).

At Dragonfly AI, we respect the privacy rights and data protection rights of our users and recognize the importance of protecting the personal information we collect about you. Our Privacy Policy is designed to help you understand what information we collect and how we use and share that information. This Privacy Policy applies to our Websites and Services.

As used in this Privacy Policy, “**Dragonfly AI**,” “**us**” and “**we**” refers to Dragonfly Technology Solutions Ltd. and its affiliates. The “**Websites**” means Dragonfly AI’s websites (including without limitation dragonflyai.co and any successor URLs, mobile or localized versions and related domains and subdomains), and the “**Services**” means Dragonfly AI APIs, Dragonfly AI Apps, Dragonfly AI Code and services, in each case in whatever format they may be offered now or in the future. The Websites and Services are collectively referred to herein as the “**Offerings**.”

This Privacy Policy describes how we collect, store, use and disclose such personal data, our roles as “**Data Controller**” and “**Data Processor**” of such data (as well as any other personal data we might process on our Customers’ behalf).

Topics

- What data do we collect?
- What is your legal basis for processing?
- Are we a data controller or data processor?
- How do we collect your data?
- How will we use your data?
- How do we store your data?
- What are your data protection rights?
- What are cookies?



- How do we use cookies?
- Privacy policies of other websites
- Changes to our privacy policy
- How to contact us
- How to contact the appropriate authorities

What data do we collect?

We use Personal Data as necessary for the performance of our Offerings; to comply with applicable law; and to support our legitimate interests in maintaining and improving our Services and sales offerings, understanding how our Offerings are used, optimizing our marketing and advertising services, customer service and support operations, and protecting and securing our Visitors, our Customers, ourselves and our Services.

Dragonfly AI collects the following data:

Personal identification information

- First name
- Last name
- Email address
- Phone number
- Job title
- IP address

Other information

- Uploaded images and other media
- Company information
- Payment information
- Technical and device information
- Product and website usage information
- Interactions on third-party sites or platforms, such as social networking sites. This may include information such as “Likes”, profile information gathered from social networking sites or the fact that you viewed or interacted with our content.

Are we a data controller or processor?

Certain data protection laws and regulations, such as the GDPR, typically distinguish between two main roles for parties processing Personal Data: the “Data Controller”, who determines the purposes and means of processing; and the “Data Processor”, who



processes the data on behalf of the Data Controller. Below we explain how these roles apply to our Services, to the extent that such laws and regulations apply.

Dragonfly AI is the “Data Controller” of its Visitors’, Customers’ and prospective Customers’ personal data, and with respect to which, assumes the responsibilities of Data Controller (solely to the extent applicable under law), as set forth in this Privacy Policy. Dragonfly AI furthermore acts as Data Controller with regard to account data as submitted within the creation of a Customer profile or account on the Platform.

Any images or content uploaded by the Customer shall be processed by Dragonfly AI on behalf of the Customer and may be shared with such Customer in accordance with this Privacy Policy and in accordance with their reasonable instructions, subject to our Terms of Service and other commercial agreements. Such Customer shall be deemed the “Data Controller” with respect to this content and Dragonfly AI will process such data on this Customer’s behalf, as its “Data Processor”. The Customer will be responsible for meeting any legal requirements applicable to Data Controllers (such as establishing a legal basis for processing and responding to Data Subject Rights requests concerning the data they control).

How do we collect your data?

You directly provide Dragonfly AI with most of the data we collect. We collect data and process data when you:

- Place an order for any of our products or services
- Register as a user of our products or services
- Subscribe to our marketing communications
- Voluntarily complete a survey or provide us with feedback
- Use or view our website via your browser’s cookies
- Interact with our advertisements and other content on third-party sites or platforms, such as social networking sites.

How will we use your data?

Dragonfly AI collects your data so that we can:

- Process your order and payments
- Manage your account
- Provide, maintain and improve our Services
- Provide support relating to the Services
- Send you service-related communications



- Communicate directly with you, including by sending you newsletters, promotions and special offers or information about new products and services.
- To deliver you advertising on the Services or third-party sites based on your interests and usage.
- Monitor and control unauthorized use or abuse of the Services
- In the manner described to you at the time of collection or as otherwise described in this Privacy Policy.

Dragonfly AI will only share your information in the following circumstances.

- We may share your personal information with our parent companies, subsidiaries and affiliates;
- We may share your image content and personal information with third-party service providers to permit such parties to provide services that help us with our business activities, which may include assisting us with marketing, advertising our product/service offerings, or providing, maintaining and improving the features and functionality of the Services, among other things. For example, we may provide image content to our research partners to help improve our analysis algorithms and may provide personal information to our service providers for direct emailing of our newsletters or notifications of our product/service offerings. All third parties are engaged under contract and obliged to meet appropriate security requirements and comply with all applicable legislation;
- We may share your personal information when we have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process or enforceable governmental request, (b) enforce a Subscription Terms of Service, including investigation of potential violations thereof, or (c) protect against imminent harm to our rights, property or safety, or that of our users or the public as required or permitted by law;
- We may share your personal information with third parties (including our service providers and government entities) to detect, prevent, or otherwise address fraud or security or technical issues;
- We may share your personal information with our business partners who offer a service to you jointly with us, for example if we work with a business partner to provide professional services to you or when running a cross-promotion;
- We may share your Payment Information to process your payments



- We may share and/or transfer your personal information if we become involved in a merger, acquisition, bankruptcy, or any form of sale of some or all of our assets; and
- We may share your personal information with a third party if we have your consent to do so.
- We may also share aggregated or anonymized information with third parties for other purposes. Such information does not identify you individually, but may include usage, viewing and technical information such as the types of Services our customers and users generally use, the configuration of their computers, and performance metrics related to the use of Services which we collected through our technology. If we are required under applicable law to treat such information as personal information, then we will only disclose it as described above. Otherwise we may disclose such information for any reason.
- When Dragonfly AI processes your order, it may send your data to, and also use the resulting information from, credit reference agencies to prevent fraudulent purchases.

How do we store your data?

Data Location

Your personal data may be maintained, processed and stored by our authorized affiliates and Service Providers in the United States of America (U.S.), UK and other jurisdictions, including the European Union, as necessary for the proper delivery of our Services, or as may be required by law.

Dragonfly AI may be required to transfer Personal Data to countries other than the country in which the data originated. Any such transfers shall be done in compliance with all applicable laws. While privacy laws may vary between jurisdictions, Dragonfly AI and its affiliates and Service Providers are each committed to protect Personal Data in accordance with this Privacy Policy and customary industry standards, regardless of any lesser legal requirements that may apply in their jurisdiction.

Data Retention

We retain visitors' and customers' Personal Data for as long as reasonably necessary in order to maintain and expand our relationship with them and to provide them with our Services.



We retain our Customer personnel's Account Data in accordance with the instructions of their organization (our Customer), or for as long as their account is active, and we have not been notified otherwise, or as long as we consider necessary for the purposes described herein.

We will also retain your Personal Data for as long as is required in order to comply with our legal and contractual obligations, or to protect ourselves from any potential disputes (i.e. as required by laws applicable to log-keeping, records and bookkeeping, and to have proof and evidence concerning our relationship, should any legal issues arise following your discontinuance of use), in accordance with our data retention policy.

Please note that except as required by applicable law, we will not be obligated to retain your Personal Data for any particular period, and we are free to securely delete it for any reason and at any time, with or without notice to you. If you have any questions about our data retention policy, please contact us by email at privacy@dragonflyai.co.

Security

The security of your personal information is important to us. We maintain a variety of appropriate technical and organizational safeguards to protect your personal information. We limit access to personal information about you to employees who we believe reasonably need to come into contact with that information to provide products or services to you or in order to do their jobs. Further, we have implemented reasonable physical, electronic, and procedural safeguards designed to protect personal information about you. When you enter sensitive information (such as your password), we encrypt that information in transit using industry-standard Transport Layer Security (TLS) encryption technology. No method of transmission over the Internet, method of electronic storage or other security methods are one hundred percent secure. Therefore, while we strive to use reasonable efforts to protect your personal information, we cannot guarantee its absolute security. You can find out more about our technical and organizational safeguards in our Security policy.

What are your data protection rights?

Dragonfly AI would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

The right to access – You have the right to request Dragonfly AI for copies of your personal data. We may charge you a small fee for this service.



The right to rectification – You have the right to request that Dragonfly AI correct any information you believe is inaccurate. You also have the right to request Dragonfly AI to complete the information you believe is incomplete.

The right to erasure – You have the right to request that Dragonfly AI erase your personal data, under certain conditions.

The right to restrict processing – You have the right to request that Dragonfly AI restrict the processing of your personal data, under certain conditions.

The right to object to processing – You have the right to object to Dragonfly AI's processing of your personal data, under certain conditions.

The right to data portability – You have the right to request that Dragonfly AI transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email: privacy@dragonflyai.co

Cookies

Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. When you visit our websites, we may collect information from you automatically through cookies or similar technology

For further information, visit allaboutcookies.org.

How do we use cookies?

Dragonfly AI uses cookies in a range of ways to improve your experience on our Services. For more information, read our Cookie Policy available at <https://cdn.dragonflyai.co/legal/cookie-policy.pdf> or any successor URL.

Privacy policies of other websites

The Dragonfly AI website contains links to other websites. Our privacy policy applies only to our Offerings, so if you click on a link to another website, you should read their privacy policy.



Changes to our privacy policy

Dragonfly AI keeps its privacy policy under regular review and makes the latest version available via the Dragonfly AI website.

How to contact us

If you have any questions about Dragonfly AI's privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us via privacy@dragonflyai.co