

## **The Privacy and Cookie Policy**

This Privacy and Cookie Policy is an integral part of the Terms and regulates our use of, in particular, Your Personal Data, and also provides information about how and when we use cookies – all in the context of Your usage of the Services.

If You have any questions about this Privacy and Cookie Policy, please contact us at

### **The Laws and Regulations**

The laws that govern personal data in EU are:

- Law providing for the Protection of Natural Persons with regard to the Processing of Personal Data and for the Free Movement of such Data of 2018 (Law 125(I)/2018)
- REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing General Data Protection Regulation (“GDPR”).

“Personal Data” has a meaning outlined in the General Data Protection Regulation (GDPR).

### **Basic Principles**

Your privacy is critically important to us. We have a few fundamental principles:

- We are thoughtful about the Personal Data we ask You to provide and the Personal Data that we collect about You through the operation of our Services.
- We store Personal Data for no longer we really have a need to keep it or when it is required by law.
- We aim for full transparency on how we gather, use, and share Your Personal Data.

### **What Our Privacy Policy Covers**

We are the company Nuovo Step s.r.o., registered in the Czech Republic.

This Privacy Policy applies to information that we collect about You when You use our website: Textero.ai

We are committed to protect and respect Your privacy. This Privacy Policy sets out how we may use, process and store Your Personal Data. If such Personal Data can directly or indirectly refer to You as a natural person, such information consists of Your “**Personal Data**” and shall be strictly protected by us. Below we explain how we collect, use, and share information about You, along with the choices that You have with respect to that information.

### **How We Can Receive Your Information**

We may get that information from You or our partners, through contracts or other legal arrangements You have with us or our partners on behalf of us, in order to deliver contractual/legal obligations. Your permission and consent can be collected by us directly, or we may receive your Personal Data from third parties whom You have given consent to pass this data on to us.

### **Information we collect about you**

When using our Services and paying for them, and/or visiting our website, or member communities, we may automatically collect information about You, for example:

- Public information from Your Facebook account;
- Information from the payment provider (as of the moment – Checkout);
- Information about what type of device You use;
- Cookies;

*The following part is related to the latter type of information, cookies. Please familiarize yourself with it, and proceed further to find out about other types of information we collect.*

#### **What is a cookie?**

Cookies are small text files we send to Your computer or mobile device. They are unique to Your account or Your browser. Session-based cookies last only while Your browser is open and are automatically deleted when You close Your browser. Persistent cookies last until You or Your browser delete them or until they expire.

You can read more about cookies at [this site](#).

#### **Do we use cookies?**

Yes. We use cookies and similar technologies like single-pixel GIFs and web beacons. We use both session-based and persistent cookies to provide You Services. We set and access our own cookies, and we also use third-party cookies, like Google Analytics.

#### **How do we use cookies?**

Some cookies are associated with Your account and Personal Data in order to remember that You are logged in and which Services You order. Other cookies are not tied to Your account but are unique and allow us to carry out analytics and customization, among other similar things.

Cookies can be used to recognize You when You use our services, remember your preferences, and give You a personalized experience that's consistent with Your settings. Cookies also make Your interactions faster and more secure.

#### **How we use cookies for advertising?**

Cookies and other ad technology such as beacons, pixels, and tags help us market more effectively to users that we and our partners believe may be interested in our services. They also help provide us with aggregated auditing, research, statistics, and reporting and know when content has been shown to You.

#### **What to do if You don't want cookies to be set?**

You may prefer not to allow cookies, which is why most browsers give You the ability to manage cookies to suit Your interest. In some browsers, You may also manage cookies preferences for each particular website, or service/application (if provided in a form of website).

You can find the instructions how to manage Your cookies for different browsers below:

- [Google Chrome](#)
- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Safari](#)
- [Android Browser](#)
- [Opera](#)

For other browsers, please consult the documentation that Your browser manufacturer provides.

You may opt-out of third-party cookies from Google Analytics on its website.

You can opt out of interest-based targeting provided by participating ad servers through the Digital Advertising Alliance (<http://youradchoices.com>). In addition, on Your iPhone, iPad or Android, you can change your device settings to control whether you see online interest-based ads.

**Note!** If you limit the ability of websites and applications to set cookies, You may worsen Your overall user experience and/or lose the ability to access the Services, since it will no longer be personalized to You. It may also stop You from saving customized settings, like login information.

#### **Cookies We Use**

<b>Categories of Use</b>	<b>Description</b>
Authentication	If You're signed in to our website, cookies help us show You the right information and personalize Your experience.
Security	We use cookies to enable and support our security features, and to help us detect malicious activity.
Preferences, features, and services	Cookies can tell us which language You prefer and what Your communications preferences are. They can help You fill out forms on our website more easily. They also provide You with features, insights, and customized content.
Marketing	We may use cookies to help us deliver marketing campaigns and track their performance (e.g., a user visited our support page and then made a purchase). Similarly, our partners may use cookies to provide us with information about Your interactions with their services, but use of those third-party cookies would be subject to the service provider's policies.
Performance, Analytics, and Research	Cookies help us learn how convenient our website is for users. We also use cookies to understand, improve, and research products, features, and services, including to create logs and record when You access our website from different devices, such as Your work computer or Your mobile device.

Type	Cookie	Description	Duration
Other	_hjSessionUser_3392335	Hotjar cookie that is set when a user first lands on a page with the Hotjar script. It is used to persist the Hotjar User ID, unique to that site on the browser. This ensures that behavior in subsequent visits to the same site will be attributed to the same user ID.	1 year
Other	_hjIncludedInSessionSample_3392335	Hotjar uses it to determine if a user is included in the data sampling defined by site's daily session limit.	2 minutes
Other	_hjSession_3392335	A cookie that holds the current session data. This ensures that subsequent requests within the session window will be attributed to the same Hotjar session.	30 minutes
Necessary	m	Stripe sets this cookie to process payments.	1 year 1 month 4 days
Necessary	__stripe_mid	Stripe sets this cookie to process payments.	1 year
Necessary	__stripe_sid	Stripe sets this cookie to process payments.	
Functional	_hjAbsoluteSessionInProgress	Hotjar sets this cookie to detect a user's first pageview session, which is a True/False flag set by the cookie.	30 minutes
Analytics	_ga_*	Google Analytics sets this cookie to store and count page views.	1 year 1 month 4 days
Analytics	_ga	Google Analytics sets this cookie to calculate visitor, session and campaign data and track site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognise unique visitors.	1 year 1 month 4 days
Analytics	_hjFirstSeen	Hotjar sets this cookie to identify a new user's first session. It stores the true/false value, indicating whether it was the first time Hotjar saw this user.	30 minutes
Analytics	_fbp	Facebook sets this cookie to display advertisements when either on Facebook or on a digital platform powered by Facebook advertising after visiting the website.	3 months
Advertisement	_ttp	TikTok set this cookie to track and improve the performance of advertising campaigns, as well as to personalise the user experience.	1 year 24 days
Advertisement	_rdt_uuid	Reddit sets this cookie to build a profile of your interests and show you relevant ads.	3 months
Advertisement	_tt_enable_cookie	TikTok set this cookie to collect data about behaviour and activities on the website and to measure the effectiveness of the advertising.	1 year 24 days
Advertisement	_ttp	TikTok set this cookie to track and improve the performance of advertising campaigns, as well as to personalise the user experience.	1 year 24 days

*The next part of this document is related to all other types of information we collect, except cookies. For information on them, please go back and read the latter section of this policy.*

### **Why do we collect Personal Data?**

We collect information for some or all of the following reasons:

- To provide services to You under the Terms;
- To provide information about related or other our, or our partners', products or services You might be interested in within a reasonable time afterward, if You are already an existing User;
- To provide information to You about Services You have purchased from us, or related products or Services;
- For legal reasons, for example, if You have entered into a contract with us;
- To provide information to You about our Services if You have consented to receive it.

### **Social Networking Services**

You may register to join the website by logging into Your accounts with a third-party social networking service (e.g., Facebook, Google account, and other third-party services that may be added to the website). If You choose to register using a social network profile, or to later link Your account to a social network, we will use the Personal Data You have provided to the social network (such as Your name, email address, gender and other information You make publicly available via the social network) to create the account. Note that the information we collect from and through the social network may depend on the privacy settings You have set with the social network and the permissions You grant to us in connection with linking your account on our website to Your account with the social network.

If You decide to “like” or “share” content, or to otherwise share information from or via the website with a third-party site or service, that information may be publicly displayed, and the third party may have access to information about You and Your use of the website.

Your interactions with third parties through social networks or similar features are governed by the respective privacy policies of those third parties. Please note that Your relationship with any social network is governed solely by Your agreement(s) with such social network.

### **Grounds for collecting information from You**

We may collect information from You when we have a legal reason (allowed by law or under contract) to collect the information, or when You have consented for us to do so for a specific purpose (e.g. services provision or newsletters).

### **Legal basis we have for processing Your personal data**

We may process Your personal data because:

- We have a contract with You;
- You have given us permission to do so;
- We must provide services to You because You have ordered them;
- You have asked us to do so;
- To comply with the law.

All of these reasons are reasons we may legally process the data we have about You.

### **Ways of providing data**

You may give us information about You with Your consent, for example:

- By using the Services, when such usage is done with Your Google account;
- By asking/posting question via means of the Services;
- Contacting with us through our online chat, phone numbers, emails, or other means of communication available to You.

This information may be personal, financial, educational, or related to services provided to You.

You may give us information for legal reasons, such as to enter into a contract with us, when You are buying Services from us.

### **Information we receive from other sources**

We may receive information about You if You use any of the websites we operate, any other services we provide, or from our business partners entitled to collect information on our behalf.

We also work with third parties (including, for example, business partners, subcontractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies, background checking agencies) and may receive information about You from them as part of the service we provide You, or for other legal reasons.

**Files.** We may collect and store the files You upload via the Services. Please do not share with us the files You are not permitted to use. Please do not upload or share with us the files that contain Your Personal Data or Personal Data of third parties without permission. We may not guarantee that such Personal Data will be secured.

### **Who might we share Your data with?**

Within Nuovo Step s.r.o. your personal data is only accessible to the employees who need this data for successful performance of their official duties and assignments. Outside Nuovo Step s.r.o. the access to your personal data is very restricted for only below described specific cases and in cases when processing of such personal data is necessary.

We may share Your Personal Data with third parties, either because You have consented to allow us to do so or for other legal reasons. For example, we may share your Personal Data with:

- Our marketing staff to provide You with promotional materials after You have been provided with our Services;
- Our group companies, which means our subsidiaries, or our ultimate holding company and its subsidiaries;
- Subcontractors and third parties for the purpose of the performance of a contract that we hold with them or that we hold with You;
- With third parties, because You have given consent;
- With third parties who provide us services because You have purchased goods or services.

If Nuovo Step s.r.o. uses outsourced service providers who process your data, we sign a data processing and protection agreement with such entities obliging the service provider:

- a) to implement relevant measures for protecting data confidentiality and security, and
- b) to process personal data in compliance with applicable legislation.

Nuovo Step s.r.o. does not transfer your personal data to third parties outside the European Economic Area or countries where the decision on data protection compliance is not adopted according to Article 25.6 of Directive 95/46/EC or its authorities according to Article 45.1 of the General Data Protection Regulation (EU) 2016/679.

### **Other reasons we may share Your Personal Data with a third party**

If Nuovo Step s.r.o. or substantially all its assets are acquired by a third party, Personal Data held by it about its Users will be one of the transferred assets of the company.

In addition, we will share Your Personal Data with third parties for the following reasons:

- If we must comply with a legal obligation; in certain situations, we may be required to disclose Personal Data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.
- If it is legally requested by a government agency;
- To enforce or apply our Terms or other agreements;
- To protect the rights, property, or safety of Nuovo Step s.r.o., our Users, or others;
- If exchange information with third parties aimed to prevent fraud or to reduce our credit or other risks.

### **Subprocessors**

To facilitate the provision of our Services, Nuovo Step s.r.o. may engage and use data processors who may have access to certain Personal Data (“Subprocessors”). Subprocessors may assist us in delivering infrastructure services, providing customer support, and sending email notifications. Before engaging any Subprocessor, Nuovo Step s.r.o. diligently evaluates their privacy, security, and confidentiality practices, and ensures that an agreement is in place that implements their applicable obligations.

We may use the following Subprocessors to host Customer Data or provide other infrastructure that helps with delivery of our Services (the list may be amended from time to time, please check the current version of this Privacy Policy):

Entity Name	Location of Subprocessors	Purpose of Processing
WEWEB SAS	France	Third-party hosting provider
Supabase, Inc	Singapore, USA	Third-party service provider of User authentication tools
Pipedream, Inc.	Delaware, USA	Third-party service provider of User support tools

By providing your explicit consent, you agree that Nuovo Step s.r.o. may engage Subprocessors that comply with applicable Regulations and security standards set forth in this Policy.

If Subprocessors perform tasks on our behalf, they are contractually bound to keep all collected information confidential and not to use it for any other purposes than those specified in this Policy. They may provide storage and assistance in the facilitation of technical aspects of the Services or perform functions related to the administration of the Services, such as collection and analysis, or other tasks specified in the contractual agreements.

Subprocessors remain fully liable for their actions and omissions and all their obligations under relevant agreements. Nuovo Step s.r.o. is not responsible in the event that Personal Data is disclosed due to a breach or security lapse by any such Subprocessor or their non-compliance with the requirements outlined in this Policy.

### **Aggregated data**

We may, from time to time, provide third parties with data that has been aggregated.

This means that Your Personal Data that could be used to identify You have been anonymized. Data provided to third parties in this way is not Personal Data and is only statistics or similar data; however, You still retain Your right to object.

### **Where we store and process Your Personal Data**

We primarily store and process Your personal data in the EU/European Economic Area or USA. If You are from EU, by accepting this Privacy Policy, You give us the right to store Your Personal Data in EEA and USA. We assure You that all Your data is encrypted securely, and no unauthorized persons may access them.

### **For the EU Citizens:**

Some examples of reasons Your data may be processed outside the EEA include:

- Order fulfillment;
- Payment processing;
- Technical support services.

If Your Personal Data cannot be processed within the EEA, we will:

- Comply with all data protection principles;
- Where possible, choose a country that is on the list of the EU Commissions' countries that provide adequate protection for the rights and freedoms of data subjects;
- Make sure we have assessed the adequacy of protections in all other cases.

### Transmission and storage of Your Personal Data

Unfortunately, the transmission of information via the internet is not completely secure. We cannot guarantee the security of Your data as it is transmitted and stored, however, we shall use best practice to ensure Your data is encrypted to the standard required in the GDPR to protect Your Personal Data.

### How long will we keep your Personal Data?

We will not retain Your Personal Data for longer than required.

We will keep Your Personal Data:

- For as long as required by law
- Until we no longer have a valid reason for keeping it
- Until You request us to stop using it or delete it.

We may keep just enough of Your Personal Data to ensure that we comply with Your requests not to use Your Personal Data or comply with Your right to erasure. For example, we must keep Your request to be erased even if it includes your Personal Data until such time as You are no longer our User, or for tax purposes etc.

If You have questions about our Data Retention Policy, we can provide You a copy. Please contact: **dpo@nuovostep.com**.

### If You chose not to give your Personal Data to us

If the Personal Data is necessary in order to provide services to You under a contract between You and **Nuovo Step s.r.o.**, we will have to refuse entering into that contract or providing the services before You give us Your Personal Data.

### Your Rights

We will respect Your legal rights to Your Personal Data.

Below are the rights that You have under law, and what we do to protect those rights:

Legal right	What we do to protect Your rights
The right to be informed	We are publishing this Privacy Policy to keep You informed as to what we do with Your Personal Data. We strive to be transparent about how we use Your data. We will also answer all Your questions regarding this Policy, send to the <b>dpo@nuovostep.com</b>
The right to access	You have the right to access Your information. Please contact our Data Protection Officer at <b>dpo@nuovostep.com</b> if You wish to access the Personal Data we hold about You.



The right to rectification	If the information we hold about You is inaccurate or not complete, You have the right to ask us to rectify it. If that data has been passed to a third party with Your consent or for legal reasons, then we must also ask them to rectify the data. Please contact our Data Protection Officer if You need us to rectify Your information: <b>dpo@nuovostep.com</b>
The right to erasure	This is sometimes called 'the right to be forgotten'. If You want us to erase all Your personal data, and we do not have any legal reason to continue to process and hold it, please contact our Data Protection Officer: <b>dpo@nuovostep.com</b>
The right to restrict processing	You have the right to ask us to restrict how we process Your data. This means we are permitted to store the data but not further process it. We keep just enough data to make sure we respect Your request in the future. If You want us to restrict processing of Your data, please contact our Data Protection Office: <b>dpo@nuovostep.com</b>
The right to data portability	We must allow You to obtain and reuse Your personal data for Your own purposes across services in a safe and secure way, without this effecting the usability of Your data. Please contact our Data Protection Officer if You want information how to port Your data elsewhere: <b>dpo@nuovostep.com</b> . This right only applies to personal data that You have provided to us as the Data Controller. The data must be held by us by consent or for the performance of a contract.
The right to object	You have the right to object to us processing Your data even if it is based on our legitimate interests, the exercise of official authority, direct marketing (including data aggregation), and processing for the purposeless statistics. If You wish to object, please contact our Data Protection Officer: <b>dpo@nuovostep.com</b>
The right to withdraw consent	If You have given us Your consent to process your data but have changed your mind later, You have the right to withdraw Your consent at any time, and we must stop processing Your data. If You want to withdraw Your consent, please contact our Data Protection Officer: <b>dpo@nuovostep.com</b>
The right to complain to a Supervisory Authority	You have the right to complain to the Office of the Commissioner for Personal Data Protection if You feel that we have not responded to Your requests to solve a problem. You can find their contact details here: <b>Personal Data Protection Office</b> <b>The Office for Personal Data Protection</b> <b>Pplk. Sochora 27 CZ-170 00 PRAGUE 7</b> <b>Tel: +420 234 665 111 / Fax: +420 234 665 444</b> <b>Email: <a href="mailto:info@uouu.cz">info@uouu.cz</a></b> <b>Website: <a href="http://www.uouu.cz">http://www.uouu.cz</a></b>

**Age Limitations**

To the extent prohibited by applicable law, we do not allow use of our Services and Websites by anyone younger than 16 years old. If You learn that anyone younger than 16 has unlawfully provided us with Personal Data, please contact us and we will take steps to delete such information.

**Changes to this Privacy Policy**

We may change this Privacy Policy from time to time. Laws, regulations and industry standards evolve, which may make those changes necessary, or we may make changes to our business. We will post the changes to this page and encourage You to review them to stay informed. If we make changes that materially alter Your privacy rights, we will provide additional notice, such as via email or through the Services. If You disagree with the changes to this Privacy Policy, You should deactivate your account.

**How can You reach us?**

This is our registered address, company number and contact information:

**Nuovo Step s.r.o.**

Company Registration Number: **6673888**

Email: **dpo@nuovostep.com**

**Policy Versions**

Version 1.0. Last modified: March 2023.