

Privacy Policy

Last Updated: September 3rd, 2021

Lampa.ai (“Lampa”, “our”, “us” or “we”) provides this Privacy Policy to inform you of our policies and procedures regarding the collection, use and disclosure of personal information we receive from users of lampa.ai (this “Website”) and our corresponding software applications and interactive services for devices (each an “App”). This Privacy Policy may be updated from time to time. We will notify you of any material changes by posting the new Privacy Policy on the Website. You are advised to consult this policy regularly for any changes. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms of Service, accessible [<https://lampa.ai/docs/terms.pdf>].

Information Collected

Lampa may collect information from you in several ways. When you use our Website, you may choose to provide certain information directly to us to request more information or services, including personally identifiable information (“Personal Information”), for example, your name, email address, company name, phone number and other information. When you visit our Website or use an App, some information will be automatically collected. For example, when you visit our Website your device’s operating system, Internet Protocol (IP) address, access times, browser type and language, and the Website you visited before our Website are logged automatically (“Usage Information”). In addition, when you use an App, the following types of Usage Information may all be logged automatically in ‘Log files’ or otherwise:

- Type of mobile device you use
- Operating system of your mobile device
- Wireless carrier
- Browser type
- Geographic location (with precision up to city)
- Technical information about your device (system, App software, and peripherals)

We may place “cookies” on your device’s storage drive. A cookie is a small data file that we transfer to your computer or mobile device’s hard disk for record-keeping purposes. We use cookies for two purposes. First, we utilize persistent cookies to save your login information for future logins to the Website and App. Second, we utilize session ID cookies to enable certain features of the Website and App, to better understand how you interact with the Website and App and to monitor aggregate usage by users and web traffic routing on the Website and App. Unlike persistent cookies, session cookies are deleted from your device when you log off from the Website, App and Service and then close your browser. Third-party advertisers (if any) on the Website and App may also place or read cookies on your browser. You can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. If you do not accept cookies, however, you may not be able to use all portions of the Website and App or all functionality of the applicable Service. While most browsers are set up to automatically accept cookies, you may change your settings to prevent this from happening. Please note that not accepting cookies may prohibit our Website and other Web pages from operating properly in providing you with a personalized experience.

We may receive additional information about you from third parties, partners and service providers.

Our Website does not respond to ‘do-not-track’ signals. You may, however, disable certain tracking as discussed in this policy or as per standard features available in web browsers or other relevant software.

Use of Information

We use Personal Information and Usage Information for the following purposes:

- operate and improve our Website, Apps, products, and services;
- understand you and your preferences to enhance your experience and enjoyment using our Website, Apps, products, and services;
- track, collate, and analyze your use of the Website and/or App
- respond to your comments and questions and provide customer service;
- provide and deliver products and Services you request;
- to send you related information, including confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages;
- link or combine it with other personal information we get from third parties, to help understand your needs and provide you with better service.

Sharing of Information

We do not share your personal information with third parties other than as follows:

- with your consent, for example, when you agree to our sharing your information with other third parties for their own marketing purposes subject to their separate privacy policies;
- our distributors, and other service providers who work with us and need access to your information to do that work;
- to (i) comply with laws or to respond to lawful requests and legal process, (ii) to protect the rights and property of Lampa, our agents, customers, members, and others including to enforce our agreements, policies and terms of use or (iii) in an emergency to protect the personal safety of Lampa, its customers, or any person;
- in connection with or during negotiation of any merger, financing, acquisition, or dissolution, transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets to another company. We may also share aggregated anonymous or de-identified information.
- We share your payment information with payment services providers to process payments; prevent, detect, and investigate fraud or other prohibited activities; facilitate dispute resolution such as chargebacks or refunds; and for other purposes associated with the acceptance of credit and debit cards.

Direct Marketing

We may send you promotional emails from time to time, but we will obtain your consent where required by law to do so. If you wish, you may opt-out of such communications by following the opt-out instructions contained in the respective email.

Your Preferences

Access, Amend and Correct. If you wish to access personal information that you have submitted to us, to request the correction of any inaccurate information you have submitted to us, or to request deletion of your information, you may send your request to support@lampa.ai. We will review your request and make reasonable efforts to respond to it as soon as practically possible. We may ask you for additional information so that we can confirm your identity.

Direct Marketing. You can let us know if you do not want us to send you information by clicking the unsubscribe link at the bottom of the email.

Complaints. We will take steps to try to resolve any complaint you raise regarding our treatment of your personal information. You also have the right to raise a complaint with the privacy regulator in your jurisdiction.

Individuals in the European Economic Area (the “EEA”) have the below rights with respect to their personal information:

- **Access.** You can ask us to: confirm whether we are processing your personal data; give you a copy of that data; provide you with other information about your personal data such as what data we have, what we use it for, who we disclose it to, whether we transfer it abroad and how we protect it, how long we keep it for, what rights you have, how you can make a complaint, where we got your data from and whether we have carried out any profiling, to the extent that such information has not already been provided to you in this Policy.
- **Correction.** You can ask us to rectify inaccurate Information. We may seek to verify the accuracy of the data before rectifying it.
- **Erasure.** You can ask us to erase your personal data. We are not required to comply with your request to erase your personal data if the processing of your personal data is necessary: for compliance with a legal obligation; or for the establishment, exercise or defense of legal claims. There are certain other circumstances in which we are not required to comply with your erasure request, although these are the most likely circumstances in which we would have to deny that request.
- **Restriction.** You can ask us to restrict (i.e. keep but not use) your personal data, but only where: its accuracy is contested, to allow us to verify its accuracy; the processing is unlawful, but you do not want it erased; it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; you have exercised the right to object, and verification of overriding grounds is pending. We can continue to use your personal data following a request for restriction, where: we have your consent; to establish, exercise or defend legal claims; or to protect the rights of another natural or legal person.
- **Right to object.** You can ask us to stop processing your personal information, and we will do so (i) to the extent that we are relying on our legitimate interests to use your personal information, you have the right to object to such use, unless we can either demonstrate compelling legitimate grounds for the use that override your interests, rights and freedoms or where we need to process the data for the establishment, exercise or defense of legal claims, and (ii) where we are processing your personal information for direct marketing purposes.
- **Portability.** You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it ‘ported’ directly to another Data Controller, but only where our processing is based on your consent and the processing is carried out by automated means.
- **Withdrawal of Consent.** You can withdraw your consent in respect of any processing of personal data that is based upon a consent, which you have previously provided.

Please contact us as set out in the “Contact Us” section below to exercise one of these rights.

Security

The security of your Personal Information is very important, and we employ security measures to protect your information both online and offline from access by unauthorized persons and against unlawful processing, accidental loss, destruction and damage. However, you acknowledge that our measures are on a best effort basis and we cannot guarantee the complete security of the information you provide us.

Retention

We will retain your Personal Information for at least 5 (five) years or as long as necessary for purposes for which the personal data was collected by us, as explained in this Policy or as required to comply with legal obligations or resolve claims and disputes. Our clients instruct us on how long to retain Client Data, which we handle as a data processor. We may retain personal data for longer where required by our regulatory obligations, professional indemnity obligations, or where we believe necessary to establish, defend, or protect our legal rights and interests or those of others.

Children

The Lampa Website, apps and products are not directed to children under the age of 13. If we become aware that we have collected Personal Information from a child under the relevant age without parental consent, we will take steps to delete that information.

Opt-Out

Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Website.

Contact Us

All feedback, comments, requests about privacy or how to exercise your rights should be directed to support@lampa.ai.