

Privacy Policy Collective Minds LLC

Version 23AI01

1. Definitions

Personal Data:

All information about an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular, by an identifier such as a name, an identification number, location data, an online identifier or by one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

Personal data means any operation or set of operations which is performed upon personal data or sets of personal data, whether or not by automatic means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.

Collective Minds

is an LLC company based in the United States of America;

2479 State Route 44 S
Shinglehouse, PA 16748

E-mail: support@authorfi.ai

Collective Minds is providing "Authorfi" as a SaaS (Software as a Service).

2. Subject

This Privacy Policy contains the terms and conditions applicable to the processing of Personal Data that you disclose to Collective Minds and its services.

3. Which Personal Data does Collective Minds track/process?

This Privacy Policy contains the terms and conditions applicable to the processing of Personal Data that you disclose to Collective Minds.

4. For what purposes are your Personal Data used?

Your Personal Data will be kept for the following purposes:

- Execution or conclusion of (an) agreement(s);
- Relationship management (customers (CRM) and/or suppliers);
- Direct Marketing.

5. What does Collective Minds do with your Personal Data?

Collective Minds is concerned about the protection of your privacy and personal data.

It has therefore already taken all the initiatives it deems necessary to comply with the current privacy legislation;

The General Data Protection Regulation (Regulation (EU) 2016/679, abbreviated GDPR) is a European Union regulation on information privacy in the European Union (EU) and the European Economic Area (EEA).

Collective Minds undertakes to comply with this legal framework and, where necessary, to take additional measures and implement adjustments as a result of the update.

The Personal Data requested by Collective Minds are therefore always limited to the data that we consider necessary and sufficient for the correct performance of our services.

We strive to ensure that the Personal Data processed by us are correct and are updated in the event of any change.

Your Personal Data is always kept for a specific period of time, in function of our services and/or the legal requirements with which Collective Minds must comply (e.g. accounting obligations).

Finally, we guarantee adequate protection (including encryption) against unauthorized or unlawful processing and against accidental loss, destruction or damage of your Personal Data, depending on the state of the art and the sensitivity of the Personal Data concerned.

6. Processing legitimacy (Opt-in)

6.1. Collective Minds will only process your Personal Data if (i) you give your permission to do so in relation to one or more of the specific purposes mentioned above, (ii) the processing of your Personal Data is necessary for the performance of the services you request from Collective Minds (processing in the context of the performance of a contract), or (iii) Collective Minds can invoke a legitimate interest to this end, provided that your interests or fundamental rights and freedoms do not weigh more heavily.

For direct marketing purposes, Collective Minds will always request your explicit consent for the use of your Personal Data. Notwithstanding your consent, you have the right at any time to object to the processing of your Personal Data for direct marketing purposes.

6.2. If you change your mind after your opt-in, you can withdraw your consent to the further processing of your Personal Data at any time by contacting us at support@authorfi.ai or by sending your request to the following address:

COLLECTIVE MINDS LLC
2479 State Route 44 S
Shinglehouse, PA 16748
United States of America

7. Your rights

7.1. General

COLLECTIVE MINDS strives for transparency with regard to the processing of your Personal Data. When COLLECTIVE MINDS processes your Personal Data, you may request us to be informed thereof in a concise and comprehensible manner.

Where applicable, you have the right to request COLLECTIVE MINDS to inspect, rectify or delete your Personal Data, or to restrict the processing you are involved in. You can also object to the processing of your Personal Data, and you have a right to a data transfer.

7.2. Right of access

When we process your Personal Data, you have the right to inspect this data and you can also request the following information from us:

- the categories of Personal Data concerned;
- the recipients or categories of recipients to whom the Personal Data have been or will be disclosed, in particular recipients in third countries or international organisations;

- if possible, the period for which it is expected that the Personal Data will be stored or, if that is not possible, the criteria for determining that period;
- where we do not obtain your Personal Data directly from you, the information available on the source of your Personal Data;

If you request more than one copy, we reserve the right to charge an administrative fee for this.

7.3. Right of amendments

If you find that the Personal Data processed by us is incorrect or incomplete, you can ask us to make the necessary amendments or additions.

7.4. Right to be forgotten

You have the right to require COLLECTIVE MINDS to delete the Personal Data that we process from you, but only in one of the following cases:

- Your Personal Data is no longer necessary for the purposes for which it has been collected or otherwise processed by COLLECTIVE MINDS;
- You withdraw your consent to the processing of your Personal Data and there is no other legal basis for COLLECTIVE MINDS to further process your Personal Data;
- You may object to the processing of your Personal Data on account of a specific situation relating to you, unless COLLECTIVE MINDS provides compelling, legitimate grounds for the processing that outweigh your interests, rights and freedoms or that are connected with the institution, exercise, or substantiation of a legal claim;
- Your Personal Data has been unlawfully processed;

- Your personal data must be deleted in order to comply with a legal obligation that rests on COLLECTIVE MINDS.

7.5. Right to limitation of Processing

In certain cases, you may request COLLECTIVE MINDS to limit the processing of your Personal Data, in particular:

- If you dispute the correctness of your Personal Data, for a period that allows COLLECTIVE MINDS to verify the correctness of your Personal Data;
- The processing would be unlawful, but you do not want your Personal Data to be deleted;
- COLLECTIVE MINDS no longer needs your Personal Data for processing purposes, but you need it yourself to set up, exercise or substantiate a legal claim;
- You may object to the processing of your Personal Data on account of a specific situation relating to you, awaiting an answer to the question whether the justifiable grounds of COLLECTIVE MINDS outweigh your interests, rights and freedoms or relating to the institution, exercise, or substantiation of a claim.

Any limitation of your Personal Data will result in it being marked by COLLECTIVE MINDS for the purpose of limiting its processing in the future.

8. Security of your Personal Data

Taking into account the state of the art, the implementation costs, as well as the nature, scope, context, processing purposes and the various risks to your rights and freedoms, which vary in terms of probability and seriousness, COLLECTIVE MINDS shall ensure that it has taken - and shall

update from time to time - the necessary security measures to ensure a level of security appropriate to the risk.

Where relevant, the measures taken by COLLECTIVE MINDS may include the following:

- the pseudonymisation and encryption of your personal data;
- the ability to ensure the confidentiality, integrity and availability of its processing systems and services on an ongoing basis;
- the possibility, in the event of an incident, of restoring the availability of, and access to, the Personal Data in a timely manner;
- the establishment of a procedure for periodical testing, assessing, and evaluating the effectiveness of technical and organisational measures to safeguard processing.

9. Notification of infringements

9.1. COLLECTIVE MINDS is required by law to report any breach of your Personal Data to the supervisory authority without unreasonable delay and, if possible, no later than 72 hours after it becomes aware of it.

9.2. Where appropriate, and where the breach is likely to pose a substantial risk to your rights and freedoms, COLLECTIVE MINDS undertakes to report the breach of your Personal Data to you as well, unless one of the following conditions is met:

- COLLECTIVE MINDS has taken appropriate technical and organizational protection measures to make your Personal Data incomprehensible to unauthorized persons (encryption, pseudonymization, etc.) and these measures have been applied to your Personal Data to which the breach relates;

- the communication would require a disproportionate effort. In that case, COLLECTIVE MINDS will instead make a public announcement or take a similar measure on the basis of which you will be informed equally effective.

10. Third-party Processing

10.1. For certain processing activities COLLECTIVE MINDS depends on the services of third parties for the correct performance of its services. In this respect, COLLECTIVE MINDS guarantees that it has concluded an agreement with its direct subcontractors for the processing of Personal Data (hereinafter referred to as the "Processor Agreement"), and has obtained at least a written guarantee from this third party that they will at all times act in accordance with the applicable privacy legislation, in particular the Data Protection Act and the GDPR.

By means of a Processing Agreement, these third parties undertake, when processing your Personal Data in the context of an assignment outsourced to them by COLLECTIVE MINDS, to act in full compliance with the applicable privacy legislation, in particular the Data Protection Act and the GDPR.

10.2. COLLECTIVE MINDS may rely on certain third-party service providers who have their own privacy policies regarding the information it needs to provide to them for your purchase related transactions, such as payment gateways and other payment transaction processors.

Where appropriate, we encourage you to review the privacy policies of these service providers so that you understand how your Personal Data is handled by these providers.

Please note in particular that certain providers may be located in a jurisdiction other than the European Union or may have facilities there. When you choose to proceed with a transaction involving the services of an

external service provider, your information may be subject to the laws of the jurisdiction or jurisdictions in which that service provider or its facilities are located.

10.3. Your Personal Data may be transferred outside the European Economic Area (the “EEA”). It may also be processed by staff operating outside the EEA who work for COLLECTIVE MINDS.

Some of the transfers will be to countries or organisations that sign up to protection frameworks which the European Commission has approved and will have data protection measures in place which are the same as or broadly equivalent to those in the EEA. For other transfers, they will be performed through the implementation of appropriate or suitable safeguards in accordance with applicable data protection laws. For the avoidance of doubt, safeguards may include EU Commission approved standard contractual clauses.

11. Amendments

COLLECTIVE MINDS reserves the right to change this Privacy Policy without prior individual notice. Therefore, please check this policy regularly.

12. Complaints and remarks

If you have a complaint or remark about this Privacy Policy or the processing of your Personal Data by COLLECTIVE MINDS, or if you notice a breach of the processing of your Personal Data, please contact COLLECTIVE MINDS in first instance.

This can be done by sending an e-mail to support@authorfi.ai or by sending your complaint to the following address:

COLLECTIVE MINDS LLC
2479 State Route 44 S

Shinglehouse, PA 16748
United States of America

COLLECTIVE MINDS undertakes to deal with your complaint as a matter of urgency but reserves the sovereign right to decide whether it is well-founded.

13. Applicable law

This Privacy Policy is subject to American law in the state of Pennsylvania, without regard to conflict of law principles.