

PRIVACY POLICY

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INTRODUCTION

We at NEW GENERATION TECHNOLOGY (NGT) PTE. LTD. (hereinafter referred to as “NGT”, “we” or “us”) attach great importance to the protection of your privacy and personal data. This privacy policy (“**Privacy Policy**”) applies to TuriX (hereinafter referred to as “**Services**”), including websites, applications (which may include different versions), software development kits (SDKs) for use by third-party websites and applications, application programming interfaces (APIs), and other innovative forms that emerge with technological advancements. This Privacy Policy explains to you how we collect, use, save, share, transfer or otherwise process your personal data, and your rights regarding the personal data.

We may from time-to-time update this Privacy Policy to reflect changes in legal, regulatory, operational requirements, our practices, and other factors.

If you are a California resident, please refer to “California Specific Terms” section.

If you live in the European Economic Area (“EEA”), please refer to the “EEA Specific Terms” section.

Please check these policies periodically for the latest updates.

If you have any question about this Privacy Policy, please contact: support@turix.ai.

1. WHAT DATA WE COLLECT FROM YOU

We collect the following types of personal data from you when you use the Services.

A. Personal Data You Provide

Registration and Log-in Information. When you use our Services, you need to create an account with us and login to your account. We may ask you to provide certain personal data, including your phone number, email address, username and password when creating an account and logging in the account to set up your profile.

We may provide services through various forms such as websites, applications. To enhance your user experience across all platforms, data associated with your account will be synchronized among the different versions of the platform.

Beta Testing. To help you become one of our invited beta testers, we may ask you to provide certain personal data, including your name, phone number, email address, for the purpose of identity verification and to grant you access to a test account.

Smart Assistant. The “Smart Assistant” feature in the Services is an artificial intelligence online service we provide based on large model technology, designed to help you complete various tasks more efficiently. When you use the “Smart Assistant” feature, we may ask you to provide certain personal data, including text, voice, images, video, and file information that you elect to input or provide to our Services (collectively, “**Input**”). We will perform computation and analysis on the Input in order to better understand your questions, contextual background, and instructions, so as to

execute specific tasks and present the results to you. For example, when you send the instruction “Please recommend nearby restaurants” to the “Smart Assistant”, the feature will execute your request based on your instruction, location information, device application information, historical usage records, and other relevant data, and provide valuable feedback.

Communication Information. When you contact us, we may ask you to provide certain personal data, including username, phone number, email address, feedback, inquiries or other information you choose to send.

Experience Improvement Program. You may choose to join our Experience Improvement Program by navigating to “Settings” — “System Settings” — “Experience Improvement Program.” Participation in this project helps us improve our Services, and provide enhanced interaction experience.

If you choose to join the project and provide your authorization, we may ask you to provide certain personal data, including the device information (device model, unique device identifier, device MAC address, and IP address), usage data (the number of clicks on product function buttons, duration of feature usage, your interactions with product features, usage flow, and personalized settings). The data will be used—under the premise of ensuring privacy and data security—to enhance your experience and support the improvement of our Services. For more detailed information, please refer to the [TuriX Experience Improvement Program](#). You have the right to withdraw from the [Experience Improvement Program](#) at any time. Adjusting or revoking your prior authorization will not affect your ability to use the features on the Services.

B. Personal Data We Automatically Collect

Technical Information. When you use our Services, we may automatically collect personal data including network logs, operation records, usage information, and device information (such as device model, unique device identifier, device MAC address, and IP address), to ensure the security of your account, transactions, and system operations, to fulfill obligations stipulated by applicable laws and regulations. We may use the aforementioned data to compile statistics, analyze the operation and usage status of our Services, troubleshoot issues, and improve and optimize the interactive experience of our Services.

Usage Data. When you use our Services, we may automatically collect personal data about your use of our Services, including the features you use, device information, to improve and optimize the interactive experience of our Services.

Cookies. The Services uses cookies or similar technologies, which will collect personal data about your use of our Services, such as the application used, the site visited, and how to interact with the content provided through the service. Please check “[COOKIES AND SIMILAR TECHNOLOGIES](#)” section for further details.

C. Personal Data We May Receive from Third Parties

We may collect or receive personal data about you from third parties, such as our affiliates, business partners, marketing partners, and public domains. This personal data include:

Name or Category of Third Party	Personal Data Collected	Purpose of Collection
Google	Profile photo, username	using a third-party social network account to register an account and log into the Services

D. Combination of Data

You agree that we may combine the personal data we receive from and about you, including Personal Data You Provide and Personal Data We Automatically Collect, as well as Personal Data We May Receive from Third Parties to help us tailor our communication to you and to improve our services and products.

It may be that providing certain personal data to us is a statutory or contractual requirements, a requirement necessary to enter into a contract, or that you are otherwise obliged to provide the data to us. If that is the case, we will inform you thereof separately, and will also explain the possible consequences if you fail to provide such personal data to us. In all other cases, provision of the requested personal data is optional, but it may affect your ability to use certain services or to participate in certain programs or systems, where the data is needed for those purposes.

2. USE OF YOUR PERSONAL DATA

We collect and use your personal data for the following purposes:

- Identify you when you sign in to your account;
- Ensure a consistent service experience and to guarantee interconnection between services, by using a unified account service to collectively collect and process your personal data;
- Provide, administer, maintain the Services, such as enabling you to use the Services, browse the regulation compilations and provide user support;
- Improve, review and develop our Services (e.g. train the large language model that support the Services) and conduct analysis, by monitoring interactions on the Services and collecting feedbacks from you;
- Respond to your inquiries and contact you about changes to this Privacy Policy and/or the Services;
- Prevent illegal activities, such as fraud, situations involving potential threats to the physical safety of any person, misuses of our Services or as otherwise required by law;
- For any other purposes disclosed at the time the data is collected or to which you consent; and
- As otherwise specifically described in this Privacy Policy.

3. SHARING PERSONAL DATA

Other than consented by you, we commit that we will not share or sell your personal data to any third party. In addition to the information disclosed in the “COOKIES AND SIMILAR TECHNOLOGIES” section, we may share your personal data with the following third parties:

Names or the Categories of the Third Party	Shared Data	Purpose of Sharing
Beijing Steamory Technology Co., Ltd.	Phone number, email address, Google account	To facilitate identity verification and login.

Depending on where you are and which product you asked for, we may share your personal data with our affiliates so that we can response to your request, provide our services in a consistent manner or for other purposes in this Privacy Policy. You can obtain the identity and contact details

on our affiliates with who we share your personal data by contacting us using the details set out below in the “CONTACT US” section.

We will not disclose or transfer your personal data to any non-affiliated third parties, unless:

External Processing

To provide you with a better experience through improving the Services or otherwise where you have consented, we may share the personal data with third-party service providers (in particular, site hosting, backend service provider, analytics service providers), contractors and agents, and use it consistent with this Privacy Policy.

Legal Reasons

We will share personal data if we have a good-faith belief that access, use, preservation, or disclosure of the personal data is reasonably necessary to (i) meet any applicable law, regulation, legal process/procedure, lawsuit or enforceable governmental request, (ii) protect and defend our rights or property, (iii) prevent fraud or criminal activity, (iv) respond under urgent circumstances to protect the personal safety of any entity, person or group, or (v) to avoid or mitigate against legal liability.

Business Transfers

If we are involved in a reorganization, merger, acquisition, sales of assets or liquidation, we will continue to ensure the confidentiality of your personal data and inform you that your personal data will be transferred or become subject to a different privacy policy in advance.

4. COOKIES AND SIMILAR TECHNOLOGIES

We use technology such as cookies, beacons and other technologies to collect information and store your online preferences.

Cookies

A cookie is a very small text document, which often includes an anonymous unique identifier. Cookies are created when your browser loads a particular website. The website sends information to the browser which then creates a text file. Every time the user goes back to the same website, the browser retrieves and sends this file to the website's server. Find out more about the use of cookies on www.allaboutcookies.org.

You can withdraw your consent to these cookies at any time by cleaning the cookies through your browser settings.

Please note that refusing cookies does not mean you will no longer receive online advertising. It does mean that the company or companies from which you opted out will no longer deliver adverts tailored to your web preferences and usage patterns, so you may see a greater number of adverts that are irrelevant to you and your preferences.

Local storage technology

We and some third parties may use other local storage technology types associated with our Services, such as local shared objects (also known as “Flash cookies”) and HTML5 local storage. These techniques are similar to the cookies described above because they are stored in your device and can be used to store certain data about your activities and preferences. However, the devices used by these technologies may differ from standard cookies, so you may not be able to use standard browser tools and settings to control them.

Beacons

We and some third parties may also use data called beacons (or "pixels") to transfer data from your device to the server. Beacons can be embedded in online content, videos, and e-mail, and can allow the server to read certain types of data from your device to see when you view specific content or specific email messages, make sure you view the beacon Time and date, and the IP address of the device. We and some third parties use beacons for a variety of purposes, including analysis of service usage and (in conjunction with cookies) to provide content and ads that are more relevant to your needs.

By accessing and using our Services, you agree to store cookies, other local storage technologies, beacons, and other information on your device. In addition, you also agree that we and these third parties access such cookies, local storage technology, beacons, and information.

We use Cookies on our Services as described below:

Type of the Cookie	Name	Personal Data Processed	Purpose of the Cookie	Range of Usage
Strictly Necessary	cf_bm,lqd-gdpr, sbjs_current, sbjs_current_add, sbjs_first,sbjs_first_add, sbjs_migrations, sbjs_session, sbjs_udata, wp-settings-1, wp-settings-time-1	No personal data is stored.	Used to determine the language version of the current management content system, which is a cookie built into the system framework.	https://turix.ai , https://turixapi.io/
Analytical & Functionality	Username, Phone , UserId, Email, Avatar/Picture, Name, LoginAt, Token/AccessToken, IdToken/rawIdToken	Only anonymized access data will be recorded.	Used to limit the amount of access and avoid server overload.	https://turix.ai , https://turixapi.io/

5. PROTECTING PERSONAL DATA

Security Measures

We use a variety of organizational and technical security measures, including encryption and authentication tools, to protect your personal data. We use secure servers when you use our Services.

For privacy protection reasons, we kindly request you do not provide certain personal data, such as passwords, credit card numbers or PINs or other confidential data during your interactions with the Services. Our commitment to safeguarding your privacy is unwavering, but the security of personal data also relies on your safe practices.

Data Transfers

We may maintain servers around the world and your data may be processed on servers located outside of the country where you live.

Regardless of where your data is processed, we apply the same protections described in this policy. We will also keep this Privacy Policy in compliance with significant legal frameworks relating to the transfer of data. If we receive your complaints about data transfers, we will cooperate with appropriate regulatory authorities when we cannot directly resolve it. Some of our recipients of your personal data are located in countries that may not – by law – provide the same level of data protection as you are used to in certain countries. If that is the case, we will ensure that adequate

safeguards are in place to duly protect your personal data and we guarantee that we are able to and have mechanisms in place to respect the level of data protection required by EU data protection laws and that we shall refrain from processing personal data in the event of a breach of the concluded safeguarding measures or if we (or our recipients) are no longer able to honour them.

For transfers of personal data from EEA to a third country, please refer to our [“EEA SPECIFIC TERMS”](#) section below.

6. CHILDREN’S POLICY

We do not knowingly collect or solicit personal data from children under 18. If you are a child under the age of 18, you must obtain prior consent from your parents/legal guardians before using our Services. If we are aware that a child under 18 has provided us with personal data without prior consent, we will delete such data from our servers. If you have reason to believe that a child under the age of 18 has provided Personal Data to us through the Services, please contact us via support@turix.ai.

7. APPLICATION

This Privacy Policy applies to all the Services provided by NGT.

This Privacy Policy does not apply to personal data that we process on behalf of customers of our business offerings, such as our API. Our use of that data is governed by our [Terms of Service](#) covering access to and use of those offerings.

To better enrich your experience, our Service may contain links to other websites not operated or controlled by NGT (including our affiliates), including social media services, payment services (collectively, “**Third-Party Services**”). You can choose whether to access such content or links, or whether to use the third party’s products or services. However, we do not have control over the products or services provided by third parties. We cannot control any of your personal data held by third parties. By providing these links we do not imply that we endorse or have reviewed these Third-Party Services. The personal data protection issues in connection with your use of any Third-Party Services are not governed by this Privacy Policy. We strongly advise you to review the privacy policy of every site you visit.

If provisions from this Privacy Policy are in conflict with the law, they will be replaced by provisions of the same purport that reflect the original intention of the provision, all this to the extent legally permissible. In that case, the remaining provisions remain applicable unchanged.

8. YOUR RIGHTS RELATING TO YOUR PERSONAL DATA

You are entitled to the following rights:

- a) right of access to your personal data;
- b) right to data portability (i.e., you have the right to receive your personal data in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller);
- c) right to correction if your personal data is not complete or accurate;
- d) right to deletion or restriction of your personal data, as permitted by law;

- e) right to object (i.e., objecting to our processing of your personal data) (e.g., in case we process your data for direct marketing purposes), as permitted by law;
- f) right to withdraw your consent where we have asked for your consent at any time with future effect and without affecting the lawfulness of processing of your personal data based on the consent you provided before you withdrew it.

The exercise of the abovementioned rights is free of charge and can be carried out by phone or by e-mail via the contact details displayed in the [“CONTACT US”](#) section. If requests are manifestly unfounded or excessive, in particular because of the repetitive character, we will either charge you a reasonable fee or refuse to comply with the request. We may request specific information from you to help us confirm your identity before we comply with a request from you concerning one of your rights.

We will provide you with information about the follow-up to the request without undue delay and in principle within one month of receipt of the request. Depending on the complexity of the request and on the number of requests, this period can be extended by another two months. We will notify you of such an extension within one month of receipt of the request. The applicable privacy legislation may allow or require us to refuse your request. If we cannot comply with your request, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

These rights are not absolute, they **may be limited in some situations**. For example, where we can demonstrate that we have a legal requirement to process your data or if making the information available to you would reveal personal data about another person or if we are legally prevented from disclosing such information. In some instances, this may mean that we are able to retain data even if you withdraw your consent.

We hope that we can satisfy any queries you may have about the way we process your data. In the event you still have unresolved concerns, you also have the right to lodge a complaint with a supervisory authority, in particular to the data protection authority in the country of your habitual residence or place of work.

A note of accuracy: Services like “Smart Assistant” generate responses based on user Input. In some cases, the responses may not always be factually accurate. For this reason, you should not rely on the factual accuracy of output from our Services. If you notice that output contains factually inaccurate information about you and you would like us to correct the inaccuracy, you may submit a correction request via the contact details displayed in the [“CONTACT US”](#) section. Due to the technical complexity of how our Services work, we may not be able to correct the inaccuracy in every instance. If so, you can request the removal your personal data from our output.

Your California Privacy Rights

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, please refer to [“CALIFORNIA SPECIFIC TERMS: PRIVACY DISCLOSURES”](#) section below.

9. MARKETING

If we are legally required to do so, we will seek your prior consent before providing you with promotional materials or information. You may withdraw your consent at any time (this will not affect the processing of your personal data undertaken until the withdrawal). If you want to stop receiving promotional materials, etc., you can do so at any time by communicating with us.

10. DATA RETENTION

We will retain your personal data for as long as is necessary to carry out the purposes set out herein. We will also retain your personal data deemed necessary to comply with legal obligations, settle disputes, and enforce agreements.

Where applicable, we will delete your personal data upon your request. We are entitled at all times to delete your personal data without notice. In such case, we owe no compensation to you as result of deletion of the personal data.

If you wish to obtain further information about the retention periods as applied to your personal data, you may contact us via the contact details displayed in the “CONTACT US” section.

11. CONTACT US

The **data controller** for your personal data will be NEW GENERATION TECHNOLOGY (NGT) PTE. LTD.

If you have questions about this Privacy Policy or wish to contact us for any reason in relation to our personal data processing, please contact us at contact@turix.ai.

12. CHANGES TO OUR PRIVACY POLICY

We reserve the right to amend this Privacy Policy at our discretion and at any time. When we make changes to this Privacy Policy, we will post the updated notice on the Services, and update the effective date. Your continued use of the Services following the posting of changes constitutes your acceptance of such changes.

EEA SPECIFIC TERMS

In addition to our Privacy Policy presented above, the following terms will apply to the processing of Personal Data of data subjects in the European Economic Area (“EEA”).

1. LEGAL BASIS OF GDPR FOR PROCESSING YOUR PERSONAL DATA

We process this personal data for the following purposes and based on the following legal grounds:

Purpose of processing	Type of Personal Data processed	Legal Basis	Retention period
To create an account with us and login to your account	phone number, email address, username and password	On the basis of your consent	as long as you have an account
To help you become one of our invited beta testers	name, phone number, email address	On the basis of your consent	as long as you have an account
To provide the “Smart Assistant” feature	text, voice, images, video, and file information	On the basis of your consent	as long as you have an account
To communicate with you	username, phone number, email address, feedback, inquiries or other information you choose to send	[Performance of contract: processing is necessary for the performance of a contract to which you are a party	as long as you have an account
To help you join our Experience Improvement Program	the device information (device model, unique device identifier, device MAC address, and IP address), usage data (the number of clicks on product function buttons, duration of feature usage, your interactions with product features, usage flow, and personalized settings)	On the basis of your consent	as long as you have an account
To ensure the security of your account, transactions, and system operations, to fulfill obligations stipulated by applicable laws and regulations	network logs, operation records, usage information, and device information (such as device model, unique device identifier, device MAC address, and IP address)	1. Legitimate interest of the data controller 2. Performance of contract: processing is necessary for the performance of a contract to which you are a party	as long as you have an account
to improve and optimize the interactive experience of our Services	the features you use, device information	Legitimate interest of the data controller	as long as you have an account

As this might be necessary for compliance with a legal obligation that is applicable to us, such as: in response to requests by government or law enforcement authorities conducting an investigation, or to comply with the requirements imposed by applicable law or any court order.

Aggregated Personal Data refers to data that has been carefully de-identified and anonymized to ensure that it cannot be linked back to any specific individual. We may aggregate Personal Data or

collect aggregated data from our users, which is essential for enhancing the functionality and performance of our Services. This enables us to analyze user behavior, improve our product's features, develop new products and services, conduct research, and other similar purposes. We use this information to gain insights into overall usage patterns and trends, helping us make data-driven decisions to enhance the user experience. In some cases, we may also choose to share or publish this aggregated data.

In addition, from time to time, we may share or publish aggregated data like general user statistics with third parties. We collect this data through the Services, through cookies, and through other means described in this Privacy Policy. We will maintain and use de-identified data in anonymous or de-identified form, and we will not attempt to re-identify the data, unless required by law.

We are committed to adhering to relevant privacy and data protection regulations and our Privacy Policy in all our data aggregation activities. If you have any questions or concerns regarding data aggregation, please read our full Privacy Policy for more details on how we handle and safeguard your data. Your privacy and security are our top priorities.

2. TRANSFER OF PERSONAL DATA OUTSIDE OF THE EEA

Your personal data described in this Privacy Policy may be stored and processed in the countries in which we have affiliates and/or in which we engage third-party vendors, such as Singapore. You understand that your personal data will be transferred to countries/regions outside of your country of residence, which may have data protection rules that are different from those of your country. As required by applicable law, we will put in place appropriate or suitable safeguards to ensure that your personal data is treated by those third parties in a way that is consistent with, and which respects the data protection laws of the country in which you reside. These include agreements and commercial terms which contain relevant protections and place appropriate obligations on third parties which have access to or receive your personal data.

In situations where we transfer your personal data outside the EEA to a third country which may not be subject to an adequacy decision by the EU Commission or considered adequate as determined by applicable data protection laws, we will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the applicable laws. We use the European Commission-approved Standard Contractual Clauses, a vendor's Processor Binding Corporate Rules or other data transfer mechanisms available under applicable data protection laws, and further (organisational/contractual/technical) supplementary measures where necessary to ensure the effectiveness of the transfer mechanisms. A copy of the relevant mechanism can be obtained for your review on request via the contact details displayed in the ["CONTACT US"](#) section.

CALIFORNIA SPECIFIC TERMS: PRIVACY DISCLOSURES

If you are a California resident, the following additional privacy disclosures under the California Consumer Privacy Act of 2018 (“CCPA”) and other California laws may be applicable to you and allow you to exercise your rights regarding your personal information.

1. INTRODUCTION

If the CCPA is applicable, you have the right to know and understand how we collect, use, disclose, and share your personal information, to access your information, to request that we delete specific information, to exercise your rights to opt-out, and also not be discriminated against when exercising your privacy rights granted under the CCPA.

2. CATEGORIES OF INFORMATION WE MAY COLLECT

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly, or indirectly, with a particular consumer, household, or device (“**personal information**”). We may have collected the following categories of personal information from users within the last twelve (12) months:

- A. Identifiers: username, online identifier, IP address, email address, or other similar identifiers].
- B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), such as phone number and other personal information details that may overlap with other categories.
- C. Internet or other electronic network activity information, such as the usage data we receive when you access or use our Services. This includes information about network logs, operation records, usage information, and device information (such as device model, unique device identifier, device MAC address, and IP address).
- D. Geolocation data: Physical location.

We obtain the categories of personal information listed above from the following categories of sources:

- Information and data directly provided by you on the Services.
- Information and data indirectly from you through the Services.

Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information
- Information excluded from the CCPA’s scope, like health or medical information covered by HIPAA, clinical trial data, or other qualifying research data; and personal information covered by certain sector-specific privacy laws, including the FCRA, GLBA, or FIPA, and the Driver’s Privacy Protection Act of 1994.

To better understand how we collect your information, please review the general terms of the Privacy Policy.

3. PERSONAL INFORMATION THAT WE MAY SHARE

We may share your personal information by disclosing it to third parties for business purposes. We only make these business purpose disclosures under written contracts that describe the specific business purposes, require the recipient to keep the personal information confidential, and prohibit using the disclosed information for any purpose except performing the obligations under the contract.

As stated in the general terms of the Privacy Policy, we do not sell your personal information unless we obtain your consent. We do not knowingly collect personal information from individuals under age of 18; and therefore, our personal information sales do not include information about individuals we know are under age of 18.

In the preceding twelve (12) months, we have shared the following categories of personal information to the following categories of third parties:

Personal Information Category	Category of Third-Party Recipients	Sales
	Business Purpose Disclosures	
Identifiers	We may disclose this information to Beijing Steamory Technology Co., Ltd. to facilitate identity verification and login.	N/A

To better understand how we share your information, please review the general terms of the Privacy Policy presented above.

5. YOUR RIGHTS AND CHOICES

Right to Know and Data Portability

The CCPA provides California residents specific rights to know about our collection and use of their personal information over the past twelve (12) months (the “right to know”). Once we receive your request and confirm your identity, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling (if applicable) that personal information.
- The categories of third parties with whom we share that personal information.
- If we sold or disclosed (if applicable) your personal information for a business purpose, we will provide two separate lists that:
 - identify the personal information categories that each category of recipient purchased in connection with sales of your personal information; and
 - identify the personal information categories that each category of recipient obtained in connection with disclosures of your personal information for a business purpose.
- The specific pieces of personal information we collected about you (also called a data portability request).

Right to Delete

The CCPA provides California residents specific rights to delete their personal information that we collected from them and retained, subject to certain exceptions (the “right to delete”). We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Provide service that you requested from the Services, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug the Services to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.

Once we receive your request and confirm your identity, we will delete or deidentify personal information and direct our service providers to take similar action, unless subject to one of these exceptions above.

How to Exercise the Rights to Know or Delete

To exercise your rights to know or delete described above, please submit a request via the contact details displayed in the [“CONTACT US”](#) section.

Only you, or someone legally authorized to act on your behalf, may make a request to know or delete related to your personal information.

You may only submit a request to know twice within a 12-month period. Your request to know or delete must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include: your identification information, a signed permission authorizing the representative to submit the request on your behalf, and any other information permitted or recommended by the CCPA and applicable regulations.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

We will only use personal information provided in the request to verify the requestor's identity or authority to make the request.

Response Timing and Format regarding Requests to Know or Delete

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the ten (10) business days timeframe, please contact us via the contact details displayed in the [“CONTACT US”](#) section.

We endeavor to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing. We may deliver our written response by email.

Any disclosures we provide will only cover the 12-month period preceding our receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily usable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded, or as otherwise permitted by the CCPA. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Personal Information Sales Opt-Out Rights

Under the CCPA, consumers have the right to direct us to not sell their personal information at any time (the "right to opt-out"). As stated in the general terms of our Privacy Policy, we do not sell your personal information of consumers unless we obtain consent for the sale. Consumers who opt-in to personal information sales may opt-out of future sales at any time.

To exercise your right to opt-out provided under CCPA, you (or your authorized representative) may submit a request to us via the contact details displayed in the [“CONTACT US”](#) section.

We will only use personal information provided in an opt-out request to review and comply with the request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Participation in a financial incentive program requires your

prior opt-in consent, which you may revoke at any time.

Other California Privacy Rights

- **Shine the Light Law Disclosure.**

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of the Services that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to support@turix.ai.

- **"Do Not Track" Disclosure.**

We do not monitor, recognize, or honor any opt-out or do not track mechanisms, including general web browser "Do Not Track" settings and/or signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of personal identifiable information about an individual consumer's online activities over time and across third-party websites or online services.

When you use the Services, certain third parties may use automatic information collection technologies to collect information about you or your device. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services websites. We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

- **Eraser Law Disclosure for Minor Users.**

If you are a user under the age of 18, California Business and Professions Code Section 22581 allows you to request and obtain removal of content or information you have publicly posted. You can send a request to remove any content or information you posted on the Services via email to support@turix.ai. Please notice that the removal does not ensure complete or comprehensive removal of your posted content or information in certain circumstances.