California Privacy Notice

Updated: June 10, 2025

Introduction

This California Consumer Privacy Act Notice ("California Notice") explains how Atlantix Portal L.L.C. ("Atlantix", "company", "we", "our", or "us") collects, uses, discloses, and protects the personal information of California residents. It also describes the rights California residents have under the California Consumer Privacy Act of 2018 (as amended by the California Privacy Rights Act of 2020) and how those rights can be exercised.

This Notice applies to users who access or use our platform at https://platform.atlantix.cc (referred to as "the Site") or otherwise engage with our services

This Notice supplements the U.S. Privacy Notice.

What Are the Categories of Personal Information We Collect?

We may collect or receive (and may have collected or received during the 12-month period prior to the "Last Updated" date of this California Notice) the categories of personal information listed below. Not all categories are collected or received about every individual, and the specific data collected may depend on how you interact with our platform and services.

Identifiers:

Personal identifiers such as your full name, email address, phone number, and country of residence.

Professional or Employment Information:

Information such as your job title, company name, and professional affiliation, if you provide this as part of your user profile or during communications regarding service use (e.g., subscriptions or business inquiries).

Device Information and Online Activity:

Identifiers and activity data collected automatically through your browser or device, including IP address, cookie identifiers, device type, browser type, operating system, screen resolution, referring URLs, and interactions with our website. This may also include information collected through tracking technologies such as:

- Google Analytics (e.g., page views, scrolls, clicks, device/browser data),
- Meta Pixel (e.g., ad engagement and attribution),
- TikTok Pixel (e.g., user behavior related to ads),
- Microsoft Clarity (e.g., session recordings, heatmaps),
- Amplitude (e.g., in-app behavior and feature usage patterns).

Geolocation Information:

Imprecise geolocation data inferred from your IP address.

Commercial Information:

Information about your interactions with the Site, including your interest in our services and any subscription or transaction details, where applicable.

Inferences:

Inferences drawn from your online activity and interaction with our platform (e.g., engagement level, content preferences), which may be used to improve and personalize user experience or marketing communications.

Atlantix does not collect or process Sensitive Personal Information as defined under the California Consumer Privacy Act (as amended by the California Privacy Rights Act). This includes, but is not limited to:

- Government-issued identifiers (such as Social Security numbers, driver's license or passport numbers);
- Financial account information combined with security or access codes or passwords;
- Precise geolocation data;
- Racial or ethnic origin, religious or philosophical beliefs;
- Union membership;
- Genetic or biometric data for identification;
- Personal messages, content of emails or texts, unless directed to us;
- Health data or data concerning sex life or sexual orientation.

We do not use or disclose any information for profiling in furtherance of decisions that produce legal or similarly significant effects.

If we begin collecting such information in the future, we will update this Notice and provide all legally required disclosures and choices.

What Are the Categories of Sources from Which We Collect Your Personal Information?

We may obtain and combine personal information about you from the following categories of sources:

• Provided directly by you or a member of your household:

For example, when you register on the platform, fill out a contact or subscription form, communicate with us, or update your profile information.

• Collected from a device associated with you or your household:

When you interact with our website or platform, we may collect certain technical and usage data automatically via cookies, pixels, and similar tracking technologies (e.g., Meta Pixel, TikTok Pixel, Google Analytics, Microsoft Clarity, Amplitude).

• Collected from external third-party sources:

Such as advertising or analytics partners (e.g., TikTok, Meta, Google), which may provide us with pseudonymized or aggregated information about how users engage with our advertising or platform.

• Collected from public or commercially available sources:

In limited cases, and only if lawful and appropriate, we may supplement your information with data from public or licensed sources to improve the accuracy of our records or personalize your experience.

What Are the Purposes for Collecting Personal Information?

We may use your personal information for the purposes as provided below, in accordance with applicable California privacy laws:

- To provide and manage our services, including user account registration, profile management, delivering our platform functionalities, customer communication, and user support.
- To process transactions and payments, including when you subscribe to paid services using third-party payment processors such as Stripe.
- To provide analytics and measure platform usage, including analyzing traffic, interaction behavior, and effectiveness of features using tools like Google Analytics, Meta Pixel, Microsoft Clarity, TikTok Pixel, and Amplitude.
- To perform marketing and advertising activities, including displaying targeted or personalized ads and measuring ad performance across platforms such as Meta and TikTok.
- To ensure the security and integrity of the platform, detect and prevent fraud, unauthorized access, and other malicious activity.
- To debug, identify, and repair platform errors and technical issues that affect functionality or performance.
- To improve and develop our platform, including testing new features, conducting internal research, and enhancing user experience.
- To comply with legal obligations, including applicable laws, regulations, or lawful requests by public authorities.

Where we process information in a deidentified form, we commit to maintaining that status and will not attempt to reidentify such information, unless legally permitted to do so.

Sale and Sharing of Personal Information

We may share personal information with third parties for purposes that may qualify as "selling" or "sharing" under California law, including for cross-context behavioral advertising (also known as targeted advertising). This means that we may disclose certain categories of personal information to advertising and analytics partners who use the information for their own purposes, not solely on behalf of Atlantix. California residents have the right to opt out of these disclosures at any time via the "Do Not Sell or Share My Personal Information" link provided on our Site.

This includes information disclosed to third-party platforms and service providers such as TikTok (via TikTok Pixel), Meta (via Meta Pixel), Google Analytics, Amplitude, and Microsoft Clarity, who may collect and use your personal information (e.g., IP address, cookie ID, browsing activity) for their own purposes, including analytics and targeted advertising.

We may have sold or shared the following categories of personal information with the categories of third-party recipients listed below during the 12-month period prior to the "Updated" date of this Notice:

☐ Identifiers (such as name, email address, or IP address)
– may be shared with advertising and marketing partners (such as Meta, TikTok, Amplitude,
Google), as well as analytics service providers (such as Google Analytics and Microsoft Clarity).

 □ Device Information and Online Activity (such as cookie IDs, browsing behavior, and interactions with the platform) – may be shared with advertising networks and analytics providers for behavioral profiling or measuring campaign effectiveness.
☐ Geolocation Information (non-precise, inferred from IP address) — may be shared with advertising platforms and analytics services to deliver content and measure performance.
☐ Inferences and Behavioral Segments (such as user profiles or interest categories generated through analytics) — may be shared with third-party advertising networks and analytics tools for content personalization and marketing analytics.

We do not knowingly sell or share personal information about users under 16 years of age.

To exercise your right to opt out of the sale or sharing of personal information, please visit our Do Not Sell or Share My Personal Information on the Site.

Tracking Technologies and Cookies

The Site may place and access certain cookies on your computer and/or any other electronic device used to access the Site. We use cookies to improve your experience using the Website and to improve the efficacy of our Services. Cookie and tracking technology are useful for gathering information such as browser type and operating system, tracking the number of visitors to the Site, and understanding how visitors use the Website.

We have carefully chosen these cookies and had taken steps to ensure that your privacy is protected and respected at all times. We use Cookies and similar tracking technologies to track the activity on Our Site and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze Our Service.

The technologies We may use may include:

- Cookies or Browser Cookies. A cookie is a small file placed on Your Device. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our Service. Unless you have adjusted Your browser setting so that it will refuse Cookies, our Service may use Cookies.
- Web Beacons. Certain sections of our Service and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser.

We may use both Session and Persistent Cookies, as well as both first- and third party cookies for the purposes set out below:

Strictly necessary Cookies.

Purpose: These are Cookies that are required for the operation of our website. They are necessary for the safety, security and integrity of the site.

Necessary / Essential Cookies

Type: Session Cookies

Purpose: These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users. Without these Cookies, the Services cannot be provided, and We only use these Cookies to provide You with those services.

Notice Acceptance Cookies

Type: Persistent Cookies

Purpose: These Cookies identify if users have accepted the use of cookies on the Website.

Functionality Cookies

Type: Persistent Cookies

Purpose: These Cookies allow us to remember choices You make when You use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Website.

Tracking and Performance Cookies

Type: Persistent Cookies

Purpose: These Cookies are used to track information about traffic to the Website and how users use the Website. These cookies collect information about how you use our websites, for instance, which pages you go to most. This data may be used to help optimize our websites and make them easier for you to navigate. The information gathered via these Cookies may directly or indirectly identify you as an individual visitor. This is because the information collected is typically linked to a pseudonymous identifier associated with the device you use to access the Website. We may also use these Cookies to test new pages, features or new functionality of the Website to see how our users react to them. Such cookies may be used to measure and improve the performance of our advertising campaigns and to personalize the Your experience (including ads) on TikTok, or Meta products.

Currently We use special Google Analytics cookies (_ga and _ga<container-id>, duration: 2 years) which are used for user identification and session state preservation. The _ga cookie,

installed by Google Analytics, calculates visitor, session, campaign data, and also keeps track of site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognize unique visitors.

Google Analytics receives data from the following sources:

- User HTTP requests (information about the browser and computer sending the request, such as hostname, browser type, referrer, and language).
- Browser/system information (e.g., screen resolution).
- Main cookie files (user session information).

With Google Analytics, we collect Website User information about webpage views, scrolling, outbound clicks, site search, interactions with forms and videos, file downloads, city, browser version, User-Agent string, device brand, model, name, operating system version, platform version, and screen resolution.

Currently, We use or may use special TikTok cookies (TikTok Pixel):

- Cookie name: _ttp
- Cookie Domain: Your website domain
- Duration: 13 months from the last date it was used
- Type: 1st party
- Function: Advertising cookies
- Description: To measure and improve the performance of your advertising campaigns and to personalize the user's experience (including ads) on TikTok.
- Cookie name: ttp
- Cookie Domain: .tiktok.com
- Duration: 13 months from the last date it was used
- Type: 3rd party
- Function: Advertising cookies
- Description: To measure and improve the performance of your advertising campaigns and to personalize the user's experience (including ads) on TikTok.
- Cookie name: pangle
- Cookie Domain: analytics.pangle-ads.com
- Duration: 13 months from the last date it was used

- Type: 3rd party
- Function: Advertising cookies
- Description: To measure and improve the performance of your advertising campaigns and to personalize the user's ad experiences delivered by the Pangle ad network.

Additionally, we use or may use Meta Pixel (Facebook) cookies, including but not limited to:

_fbp: Used by Meta to deliver a series of advertisement products such as real-time bidding from third-party advertisers. Duration: 3 months.

fr: Used by Meta for ad delivery and retargeting. Duration: 3 months.

_fbc: Captures the click ID from advertisements for attribution purposes. Duration: 3 months.

We also use or may use **cookies set by Amplitude:**

- Cookie name: amp project id>
- Cookie Domain: your website domain
- Duration: up to 10 years (configurable)
- Type: 1st party
- Function: Analytics cookies
- Description: These cookies are used to identify unique users and their behavior on the site, including navigation patterns, event tracking, and user retention. The data is pseudonymized and does not include personally identifiable information unless explicitly configured. Used to support product analytics and improve the platform experience.

We also use or may use Microsoft Clarity cookies:

- Cookie name: CLID
- Cookie Domain: clarity.ms
- Duration: 1 yearType: 3rd party
- Function: Analytics cookie
- Description: Identifies the first time Clarity saw this user on any site using Clarity. Helps generate anonymized heatmaps and session recordings.
- Cookie name: ANONCHK, SM, MUID
- Cookie Domain: various Microsoft domains (.clarity.ms, .bing.com, etc.)
- Duration: up to 1 year
- Type: 3rd party
- Function: Analytics and advertising cookies
- Description: Used by Microsoft for user identification, session management, ad relevance, and performance analysis. These cookies may support integration with Bing Ads.

By accepting Our use of cookies, apart from necessary cookies, you consent to our use of cookies as described under Privacy Notice. You may at any time change or withdraw your cookie consent.

If You prefer to avoid the use of cookies on the Site, first You must disable the use of cookies in your browser and then delete the cookies saved in your browser associated with this website. You may use this option for preventing the use of cookies at any time.

If You do not accept Our cookies, You may experience some inconvenience in your use of the Site and some features may not function properly.

If You'd like to delete cookies or instruct your web browser to delete or refuse cookies, please visit the help pages of your web browser. Listed below are the links to the support documents on how to manage and delete cookies from the major web browsers. If you are using any other web browser, please visit your browser's official support documents.

- Chrome: https://support.google.com/accounts/answer/32050
- **Safari**: https://support.apple.com/en-in/guide/safari/sfri11471/mac
- **Firefox**: https://support.mozilla.org/en-US/kb/clear-cookies-and-site-data-firefox? redirectslug=delete-cookies-remove-info-websites-stored&redirectlocale=en-US
- **Internet Explorer**: https://support.microsoft.com/en-us/topic/how-to-delete-cookie-files-in-internet-explorer-bca9446f-d873-78de-77ba-d42645fa52fc

You may also visit the <u>Do Not Sell or Share My Personal Information</u> page.

Sale or Sharing of Personal Information of Consumers under 16 Years of Age

Atlantix does not knowingly sell or share (for purposes of cross-context behavioral advertising) the personal information of consumers under the age of 16. We do not intentionally target, collect, or use personal data from individuals known to be under this age. If we learn that we have collected personal information from a user under 16 without appropriate consent, we will promptly delete that information.

Disclosure of Personal Information for Business Purposes

During the 12 months preceding the effective date of this Notice, Atlantix may have disclosed personal information to certain categories of service providers for business purposes such as analytics, security, fraud prevention, and advertising performance.

The types of personal information that may have been disclosed include:

- **Identifiers** (e.g., IP address, email)
- Device and online activity information
- Commercial information (e.g., records of features used on the platform)
- Geolocation data (inferred from IP address, not precise)
- Inferences drawn from usage to personalize experience or analyze engagement

We do not disclose or collect:

- Biometric data
- Background or criminal history
- Government-issued identifiers
- Health, education, or financial account data

• Sensitive demographic data (e.g., race, religion)

Disclosures are strictly limited to service providers or processors operating under contracts that prohibit further use of the information outside of Atlantix's instructions.

Retention of Personal Information

Atlantix retains personal information only for as long as necessary to fulfill the purposes outlined in this Notice — such as delivering and improving services, ensuring security, complying with legal obligations, or for internal analytics.

Once personal information is no longer required for the stated purposes, it is securely deleted in accordance with our internal data retention and disposal policies.

What Are Your California Privacy Rights?

If you are a California resident, you have specific rights regarding your personal information under the California Consumer Privacy Act (as amended by the California Privacy Rights Act). Atlantix will honor and respond to your verified requests as required by law. If we are unable to comply with your request, in whole or in part, we will provide you with a clear explanation.

You have the following rights under the California Consumer Privacy Act (CCPA) and the California Privacy Rights Act (CPRA):

- 1. Receive this Notice at or before the point of collection of your Personal Information.
- 2. Request we disclose to you free of charge the following information covering the 12 months preceding your request:
 - a. the categories of Personal Information about you that we collected;
 - b. the categories of sources from which the Personal Information was collected;
 - c. the purpose for collecting Personal Information about you;
 - d. the purpose for sharing Personal Information about you;
 - e. the categories of third parties to whom we disclosed Personal Information about you and the categories of Personal Information that were disclosed (if applicable) and the purpose for disclosing the Personal Information about you; and
 - f. the categories of Personal Information (including Sensitive Personal Information) about you that we shared and the categories of Third Parties to which we shared such Personal Information and/or Sensitive Personal Information.
 - g. the specific pieces of Personal Information we collected about you;
- 3. Request we correct inaccurate Personal Information that we maintain about you.
- 4. Request we delete Personal Information we collected from you, unless the CCPA recognizes an exception.
- 5. Be free from unlawful discrimination for exercising your rights under the CCPA.
- 6. Opt-Out from sharing or selling your Personal Information.

You may request that Atlantix:

- Provide you with access to a copy of and certain details regarding the personal information we have about you.
- Delete your personal information.
- Stop selling your personal information or sharing your personal information for cross-context behavioral advertising.
- Correct your inaccurate personal information.
- Limit the use or disclosure of your sensitive personal information (SPI).

Note: As for now, Atlantix does not collect or use sensitive personal information in a way that would trigger your right to request limitation under California law.

To exercise your California privacy rights, you may Contact us at privacy@atlantix.cc to submit your request or visit our Do Not Sell or Share My Personal Information on the Site.

We may require you to verify your identity before processing certain requests. See the "How Do We Verify Your Identity to Complete Access, Correction, or Deletion Requests" section of this Notice for details.

Delete My Personal Information

As a California resident, you have the right to request the deletion of your personal information. When you submit a verified request, we will delete the personal information we hold about you as of the date of your request, to the extent required by law, and instruct our service providers to do the same.

Please note that requesting deletion of your personal information may affect your ability to access or use certain features of the Atlantix platform. For example, it may result in the deactivation of your user account and the loss of any associated preferences or data.

Stop Selling or Sharing My Personal Information

You have the right to opt out of the sale or sharing of your personal information. To exercise your right to opt out of the sale or sharing of personal information, please visit our <u>Do Not Sell</u> or <u>Share My Personal Information</u> on the Site.

Correct My Personal Information

You have the right to request that we correct inaccurate personal information we may hold about you. If you believe any information associated with your Atlantix account is incorrect, please contact us at privacy@atlantix.cc.

In some cases, we may ask for additional documentation to verify your identity and the accuracy of the requested correction, in accordance with applicable law.

No Discrimination

Atlantix will not discriminate against you for exercising your rights under the CCPA/CPRA. This means we will not:

• Deny you access to our services,

- Charge you different prices or rates,
- Provide you with a different level of service or quality,
- Or suggest that you may receive a different price or service level.

Please note: certain features may require the use of your personal information to function properly. If you choose to delete or restrict use of such information, those features may become unavailable or limited.

How Do We Verify Your Identity to Complete Access, Correction, or Deletion Requests

To protect your privacy and prevent unauthorized access to your personal information, Atlantix will verify your identity before fulfilling any request to access, correct, or delete your personal data.

To verify your identity, we may ask that you:

- Log into your account (if you have one)
- Provide the following information:
 - First and last name
 - Email address
 - Phone number

You may also be asked to answer a few security questions or confirm your identity via a one-time verification code sent to your registered contact method. In some cases, we may use a third-party verification service to assist in confirming your identity.

If additional documentation is needed to verify your request, we will contact you with specific instructions.

What If We Cannot Verify Your Identity?

If we are unable to verify your identity using reasonable methods, we will notify you and your request may be denied. This is to ensure that personal information is not disclosed, modified, or deleted without proper authorization. Suspected fraudulent or abusive requests may also be declined.

How Can I Submit a Request Through an Authorized Agent?

You may designate an authorized agent to make a privacy rights request on your behalf. The agent can use the same method you would (e.g., by submitting a request through our website or contacting us directly).

To process the request, Atlantix requires documentation demonstrating the agent's authority to act on your behalf. Acceptable forms include:

- A valid power of attorney, or
- A signed written statement from you authorizing the agent to act for you

This documentation may be uploaded via our request form or sent to us within 10 business days of submitting the request. If the agent is submitting the request by email, supporting documents should be sent to: privacy@atlantix.cc.

How Will You Know if This Privacy Notice Changes?

We may update this Privacy Notice periodically to reflect changes in our practices, technologies, legal obligations, or for other operational reasons. When we do, we will revise the "Last Updated" date at the top of the Notice.

For significant changes, we may provide additional notice, such as a banner on our website or a direct notification, where required by applicable law.

We encourage you to review this Privacy Notice regularly to stay informed about how we protect your information.

Contact Us

If you have questions, concerns, or requests regarding this Privacy Notice or our privacy practices, you can contact us at:

Atlantix Portal L.L.C.

KHALID SHABAN Land Area, Al Garhoud

Plot Number: 115-0

Land DM No (Affection Plan): 214-493

Makani No: 32583 93906 Dubai, United Arab Emirates Email: <u>privacy@atlantix.cc</u>