# **U.S. Privacy Notice**

Updated: June 10, 2025

### Introduction

At Atlantix Portal L.L.C. (referred to as either "the Company", "We", "Us" or "Our"), we value your trust and are committed to protecting your personal information. This Privacy Notice explains how we handle the personal information we collect from you when you interact with our platform. It outlines the types of information we collect, how we obtain and use it, who we may share it with and for what purposes, how we work to keep it secure, and what rights and choices you have in relation to your personal information.

This Privacy Notice applies to individuals located in the United States who access or use our platform at <a href="https://platform.atlantix.cc">https://platform.atlantix.cc</a> (referred to as "the Site") or otherwise engage with our services within the United States.

If you are a California resident, please also refer to our <u>California Privacy Notice</u>, which provides additional details regarding your rights under the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA).

This Privacy Notice applies to the information we collect:

- On this Site;
- In email, text, and other electronic messages between you and this Site;
- Through mobile and desktop applications you download, which provide dedicated non-browser-based interaction between you and this Site;
- When you interact with our advertising and applications on third-party websites, applications, and services, if those applications or advertising include links to this Notice.

## What Personal Information Do We Collect?

We may collect or receive various categories of personal information depending on how you interact with our platform, the services you use, your device settings, and your browser or cookie preferences. Not all categories listed below will necessarily apply to every user.

#### 1. Basic personal identifiers:

- First and last name
- Email address
- Phone number
- Country of residence
- Employer or company affiliation
  This information is typically provided by you when creating an account or

communicating with us, including when purchasing a subscription or requesting business-related contact.

#### 2. Device and Online Identifiers

- IP address
- Cookie identifiers
- Account login credentials
- Device type, browser type and version
- Operating system
- Referral URL and device identifiers (e.g., advertising ID, MAC address)
  These identifiers may be collected automatically when you use our platform or interact with our content via web browsers or mobile devices.

#### 3. Internet activity

- Pages on the Site you visit and time spent on them
- · Clicks, scrolls
- Search queries or form inputs
- Referring and exit pages
- Information about your interactions with ads, including but not limited to Facebook (Meta) Pixel, TikTok Pixel, and Google Analytics
- Browser language, time zone, screen resolution

  These data points are collected through standard and third-party cookies and analytics tools for performance monitoring, security, and marketing purposes.

#### 4. Commercial information

- Subscription plan details
- Payment status (processed securely through Stripe)
- Transaction metadata (e.g., purchase date, product type)
  We do not collect or store full credit or debit card numbers on our servers; all payments are handled via Stripe's secure environment.

#### 5. Geolocation Information

General geolocation based on IP address (e.g., city or country level)
 We do not collect or track precise GPS-level geolocation unless explicitly authorized by the user, which is currently not implemented.

#### 6. Inferences

• Information inferred from user behavior, such as and platform usage patterns
These insights may be derived using tools like Meta Pixel, Google Analytics, or TikTok
Pixel to help us personalize content and improve user experience.

Note: We do not knowingly collect the following categories of information through our platform: biometric information, sensory data (e.g., audio or video recordings), background or criminal history, sensitive demographic attributes such as race or health-related information or other sensitive personal information.

### **How Do We Use Personal Information?**

We use the personal information we collect to provide you with access to the Site and services, to manage and improve our operations, and to support your interactions with us. Specifically, we may use your information for the following purposes:

- **Providing services and managing user accounts**, including account registration, subscription management, customer support, and communication regarding your use of the platform.
- **Processing transactions and payments** through our third-party payment processor (e.g., Stripe).
- Communicating with you about service updates, changes to our terms or policies, or administrative matters.
- **Performing analytics and business operations**, such as evaluating usage patterns, measuring user engagement, and improving functionality, performance, and user experience.
- **Delivering marketing and promotional content**, including personalized advertising through tools like Meta Pixel, Google Analytics, and TikTok Pixel (only where permitted by law or with your consent, where required).
- Ensuring platform security and integrity, detecting and preventing fraud, abuse, and unauthorized access.
- Debugging and troubleshooting issues to maintain the functionality and performance of our services.
- **Developing and testing new features**, conducting internal research, and enhancing the overall quality of our services.
- Complying with legal obligations, including responding to lawful requests, audits, or legal claims.

We may combine the information you provide with data collected through cookies and similar technologies to better understand user behavior and improve our offerings.

We do not intentionally collect or use Sensitive Personal Information (as defined by certain U.S. state laws) for purposes beyond those stated above. If such data is collected, it will be processed solely as necessary and, where required, with your consent.

## **How Do We Collect Personal Information?**

We collect personal information in a variety of ways, depending on how you interact with our platform. This may include information you provide directly, as well as data collected automatically through your use of our website and third-party technologies.

#### 1. Information You Provide Directly

You may provide personal information to us directly when you:

- Create an account or complete your user profile on our platform
- Fill out a contact or inquiry form
- Subscribe to one of our services or request information about our offerings
- Communicate with us via email, phone, or chat

- Provide your details for the purposes of entering into a contract (e.g., company name, job title, business affiliation)
- Voluntarily respond to surveys, feedback requests, or other messages
- Participate in any interactive features on our platform

This information may include your name, email address, phone number, country of residence, and employment-related details.

#### 2. Information Collected Through Automated Means

When you visit or interact with our platform, we automatically collect certain information about your device and browsing behavior using cookies and similar tracking technologies, including third-party tools.

This data may include:

- Device type, operating system, and browser version
- IP address and general location inferred from it
- Referring website or source
- Time spent on pages, links clicked, and navigation patterns
- Cookie identifiers, session IDs, and advertising identifiers
- Information about your interaction with emails or ads from us

These technologies help us understand user behavior, measure engagement, improve performance, and deliver more relevant content or advertising, where permitted by law.

If you are located in the United States, please note that your personal information may be transferred to, stored, or processed in countries outside of your state or country of residence, including the United Arab Emirates. These countries may not have the same data protection laws as your jurisdiction. We implement appropriate safeguards to ensure that your personal information remains protected.

# Who Do We Disclose Your Information To and Why?

We may share the categories of personal information described in this Privacy Notice with third parties for various operational, technical, legal, and business purposes, as outlined below.

#### **Advertising, Marketing and Technology Partners**

We work with a number of third-party providers to support our marketing, analytics, and advertising efforts. These parties may receive or process your personal information to help us deliver a better user experience and to optimize the performance of our services.

We may share information with platforms such as **Meta** (Facebook), TikTok, or Google, which allow us to deliver personalized ads to you, measure ad performance, and build audience segments. These platforms may use cookies, pixels, or other tracking technologies.

We partner with third-party services that use cookies, tracking pixels, and other similar tools to:

- Deliver targeted advertising;
- Measure and analyze ad effectiveness;
- Limit how many times you see a specific ad;

• Perform audience segmentation.

These partners may collect or receive data over time across multiple sites and services.

We use analytics services such as Google Analytics to understand how users interact with our platform. These services help us analyze usage trends, improve our website's performance, and deliver a more relevant experience. For more information, see <u>Google's Privacy & Terms</u>.

We may engage vendors that assist with managing our data and communications infrastructure—for example, email marketing services, CRM platforms, customer service tools, and systems for identity verification or fraud prevention.

#### Legal requirements and protection

We may disclose your personal information if required by law or in good faith belief that such disclosure is reasonably necessary to:

- Respond to subpoenas, court orders, or other legal processes;
- Comply with applicable laws or regulations;
- Cooperate with law enforcement or government authorities;
- Detect, prevent, or address fraud, security threats, or technical issues;
- Protect our rights, property, users, or the public.

#### **Business transfer**

In connection with a potential or actual merger, acquisition, asset sale, restructuring, or bankruptcy, we may transfer your personal information to relevant parties as part of the business transaction. In such cases, we will take reasonable steps to ensure your data continues to be treated in accordance with this Privacy Notice.

#### With your instruction

We may share your information with third parties when you explicitly request or authorize us to do so—such as when you choose to link your account with another service provider or use an integration.

#### Service providers and payment processors

We may disclose personal information to third-party service providers who perform functions on our behalf, such as hosting, customer support, email delivery, and payment processing.

In particular, we use Stripe, Inc. to securely process payments made through our platform. When you enter your payment details, that information is transmitted directly to Stripe and is subject to their own privacy Notice. We do not store full payment card numbers on our servers.

For more information about how Stripe processes personal data, please visit the <u>Stripe Privacy</u> Notice.

We do not sell your personal information for monetary value. However, some disclosures (e.g., for behavioral advertising) may qualify as a "sale" or "sharing" under certain U.S. state laws. Please refer to our <u>California Privacy Notice</u> for more information and your rights.

# **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**: <a href="https://support.microsoft.com/en-us/topic/how-to-delete-cookie-files-in-internet-explorer-bca9446f-d873-78de-77ba-d42645fa52fc">https://support.microsoft.com/en-us/topic/how-to-delete-cookie-files-in-internet-explorer-bca9446f-d873-78de-77ba-d42645fa52fc</a>

You may also visit the **Do Not Sell or Share My Personal Information** page.

# How Can You Access, Update, or Delete Your Personal Information?

You have the ability to access, update, or request the deletion of your personal information in several ways, depending on how you interact with our platform.

#### Managing your account information

If you have created an account on our platform, you can log in at any time to:

- View and update your name, email address, phone number, and country of residence
- Modify your company or employment-related details
- Change your password or security settings

We encourage you to keep your information accurate and up to date.

#### Requesting changes or deletion

If you would like to:

- Access the personal information we have about you,
- Correct inaccurate or outdated data, or
- Request deletion of your account, associated data, and your personal information

you may submit a request by contacting us via the **Contact Us** section below or by emailing us at <u>privacy@atlantix.cc</u>. Please include your full name, email address associated with your account, and a clear description of your request.

We may ask you to verify your identity before processing certain requests to help protect your information.

If you wish to opt out of third-party sharing or targeted advertising based on your personal information, or delete your personal information We have, you may:

- Visit the **Do Not Sell or Share My Personal Information** page on our website and submit your preference
- Adjust your cookie settings through the cookie consent banner or privacy settings tool
  provided on the Site.

## **How Do We Secure Your Personal Information?**

We are committed to protecting your personal information and take appropriate technical and organizational measures to help safeguard it from unauthorized access, disclosure, alteration, or destruction.

These measures include:

- Encryption of data in transit and at rest, where applicable
- Access controls and authentication protocols to limit access to personal information
- Regular monitoring and security audits of our infrastructure and systems
- Use of secure third-party providers, such as Stripe for payments and AWS for hosting

While we follow industry best practices, no system can be completely secure. We encourage you to protect your login credentials and notify us immediately of any suspected unauthorized use of your account.

# **How Long Do We Retain Your Personal Information?**

We retain personal information only for as long as it is necessary to fulfill the purposes described in this Privacy Notice.

Retention periods may vary depending on:

- The type of information collected
- Legal, contractual, and regulatory obligations
- Whether you still have an active account with us
- Whether you've requested deletion of your personal information

Once your information is no longer needed, we will securely delete or anonymize it in accordance with our internal data retention and disposal policies.

# **How Do We Protect the Privacy of Children?**

Our platform is intended for use by individuals who are at least 18 years old. We do not knowingly collect or solicit personal information from children under the age of 18. If we learn that we have inadvertently collected personal data from a person under 18, we will promptly delete such information.

If you believe that a minor has provided us with personal information without appropriate consent, please contact us at privacy@atlantix.cc.

## **Links to Third-Party Services and Features**

Our platform may include links to websites or services operated by third parties, including social media platforms, embedded tools (e.g., YouTube videos), or advertising providers.

These third parties may independently collect your personal information and operate under their own privacy policies, which are not governed by this Privacy Notice. We recommend reviewing the privacy notices of any third-party service you interact with through our platform.

We are not responsible for the content, privacy practices, or data security of third-party sites or features that are not under our direct control.

# **Your State Privacy Rights**

Several U.S. states — including California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Montana, New Jersey, Oregon, Tennessee, Texas, Utah, and Virginia — have enacted privacy laws that may grant you specific rights regarding your personal information.

Depending on your state of residence, you may have the right to:

- Confirm whether we process your personal information
- Access and receive a copy of the personal information we have collected about you
- Correct inaccuracies in your personal information
- Request deletion of your personal information (subject to legal and contractual exceptions)
- Request data portability (i.e., to receive your data in a structured, commonly used format)
- Opt out of:
  - o The sale or sharing of your personal information
  - o The use of your data for targeted advertising
  - Profiling in connection with decisions that produce legal or similarly significant effects

You can exercise your rights by contacting us at <a href="mailto:privacy@atlantix.cc">privacy@atlantix.cc</a> or by visiting our Do Not Sell or Share My Personal Information page.

#### **Appeals**

If we are unable to fulfill your request or if you believe our response is inadequate, you may submit an appeal by contacting us at the same address: <a href="mailto:privacy@atlantix.cc">privacy@atlantix.cc</a>. We will review your appeal in accordance with applicable state law.

#### Non-Discrimination

We will not discriminate against you for exercising your privacy rights. This means we will not deny services, charge different prices, or provide a different level of service solely because you exercised your legal rights. However, please note that some features of our services may depend on the use of certain personal data.

# How Do We Verify Your Identity for Access, Correction, and Deletion Requests?

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

Depending on the nature of your request, we may ask you to:

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

#### Phone number

We may also ask you to answer a few questions to confirm your relationship with us or to complete a one-time passcode verification. In some cases, we may engage a third-party verification provider to assist us in confirming your identity.

If further documentation is required to verify your identity, we will contact you directly.

# What If We Cannot Verify Your Identity?

If we are unable to verify your identity with a reasonable degree of certainty, we will inform you and your request may not be processed. We reserve the right to deny requests that appear to be fraudulent or where verification is not successful.

# How to Submit a Request Using an Authorized Agent

Certain state laws allow you to appoint an authorized agent to make privacy-related requests on your behalf. If you choose to do so, your authorized agent may submit a request through the same channels described in this Privacy Notice.

We require documentation proving the agent's authority to act on your behalf. Acceptable forms include:

- A valid power of attorney
- A signed letter from you authorizing the agent to submit a request

Supporting documentation can be uploaded at the time of submission or sent to us within 10 business days via email at <a href="mailto:privacy@atlantix.cc">privacy@atlantix.cc</a>. If we are unable to confirm the agent's authority, we may request that you contact us directly to verify the request.

# **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: privacy@atlantix.cc