PRIVACY POLICY

January 2025

We are a US company WRIGHT CLOUD INC. (Trademark Aristeem, hereinafter referred to as “Aristeem”). This Privacy Policy (the “Policy”) explains what data we collect from you when you use our products, services, and properties, why we collect it, and how you can access, manage, export and delete your data.

This Policy is based on and our legal relationships with you are governed by the General Data Protection Regulation (“GDPR”) and other applicable data protection laws. If you do not agree to our use of your data, please cease using our products, services, and properties.

If any provision of this Policy is unclear to you or you need clarification, please contact us at info@aristeem.com before you start using our products, services, and properties.

1. Who We Are and What this Policy Governs.

The data controller of your Personal Data is Wright Cloud INC (Trademark Aristeem), duly incorporated under the laws of the USA, located at 5900 Balcones Drive, STE 100, Austin TX 78731 registration number: 805478118.

This Policy applies to the Aristeem.com website, Aristeem user accounts, and any associated applications or software (including web clients, native and mobile apps, and Smart TV apps). It also covers office software, videos, texts, and other content you access, use, or purchase through our website, products, and services; payment methods; internal chats, blogs, and forums; customer support; and any other services or products we provide related to remote cloud-based access to third-party office software (the “Product”). The Policy governs Personal Data and other information we collect from you when you access or use the Product.

The Policy DOES NOT APPLY to Personal Data collected by third-party software accessed through the Product. This includes data collection and usage by platforms such as Microsoft Office, Adobe Suite, AutoCAD, or any other office software or third-party applications accessed via the Product. The collection and processing of your data by such third-party software are governed exclusively by their respective privacy policies and terms. This Policy does not extend to or cover their practices under any circumstances.

2. What is Personal Data

We receive/store any information you enter into the Product or provide to us in any other way, as well as collect information from you. Some of this information constitutes Personal Data, as defined under GDPR. ‘Personal Data’ refers to any information relating to an identified or identifiable natural person. An identifiable natural person is someone who can be identified, directly or indirectly, particularly by reference to a name, an identifier, location, or online identifier, or to one or more factors specific to their physical, physiological, genetic, mental, economic, cultural, or social identity. **Personal Data is information that can be used to identify you personally.**

3. Our Data Protection Principles

We comply with data protection laws, which state that personal data shall be:

• used lawfully, fairly, and in a transparent way, applying the data minimization principle;

• collected for valid purposes that we clearly explain to you and not used for other purposes;

• relevant to the purposes we reveal to you and limited only to those purposes;

• accurate and kept up to date, kept as long as necessary for the purposes we reveal to you;

• kept securely, on a hashed/anonymized basis wherever possible.

4. Protecting Children and Vulnerable Persons

Children merit specific protection about their Personal Data. We will never knowingly collect Personal Data from any child under 14. If we decide to knowingly do that, we will ask for consent from the holder of parental responsibility over the child. If you are a parent or guardian and are concerned about the use of the Personal Data of your child (whether he/she is under 14, 16, 18, or of other legal age in your jurisdiction), contact us at info@aristeem.com. If you are a parent or guardian and are concerned about the use of Personal Data of a partially incapacitated person or any other person who regardless of their age and for whatever reason exercises all or part of their rights through a parent or guardian, contact us at info@aristeem.com.

5. Why DoWeCollect Your Personal Data?

We collect Personal Data and other information to provide the services for you as our client. Your Personal Data processing is necessary to perform our services to you as requested by you when you choose to use the Product, and to maintain the proper operation of the Product (a “legitimate interest” under GDPR), or where you explicitly consent to such collection. You may withdraw your consent at any time. Here’s why we collect your Personal Data and other information:

• to ensure network and information security (prevent breaches, attacks, thefts, fraud, spam);

• to ensure that content is presented in the most effective manner for you and your device;

• to share information about the Product, other services, and products that we provide;

• to notify you about changes and updates to the Product;

• to conduct statistical analysis necessary to evaluate and improve the Product;

• to develop and improve our Product, fix bugs and errors, introduce updates;

• to send confirmations for sign-up and confirmation of other actions you make on the Product;

• to respond to your questions, and assist you with issues you experience while using the Product.

Check the next Section 6, where we explain what data we collect, and mention collection cases and purposes.

6. WHAT DATA WE COLLECT.

We will collect the following Personal Data and other information from you if you choose to use the Product:

● Your email.

We need your email to provide you with your user account. Your email should be active and valid. We use it to identify you as our user. We use your email to send you a confirmation to sign up, restore your password, and other confirmations. We use it to communicate with you, provide support, reply to your inquiries and requests, and inform you about updates of the Product. We can also contact you by email for marketing (including direct marketing) and advertising, ask you to evaluate the Product/provide feedback, and send you the content related to the Product, our company, business or the industry. You can easily unsubscribe from receiving emails at any time by clicking the “Unsubscribe” button available in our emails or by contacting us at info@aristeem.com.

● Your username.

You will obtain a random username by default when you create your account. You can change it if you want. You don’t have to use your real name as a username. If you choose an abusive username we can ask you to change it or we can deactivate your account without prior notice. If that's the case we won’t be responsible for any loss or damage to you.

● Your account password.

It is stored encrypted in our database, we do not know it. The information available in your account is protected by your password. We require you to set at least 8-characters’ password. You should keep your password safe. If you fail to keep your password secure, we won’t be liable for any loss or damage to you.

● Your account avatar.

You have one by default upon the creation of your account. You can change it by uploading a picture if you want. It will be stored on our servers as long as you have your account or till you change the avatar. When you change your avatar, the previous one is deleted. You may upload any picture you want, including a photo of yourself. Your photo will not be considered biometric data, as we do not process it through specific technical means allowing the unique identification of you as a natural person. We won’t use your photo for any purpose. It may be possible for you to upload your social network account avatar to your Aristeem account. When you proceed, you’ll see the form or page generated by a social network offering you to share your account avatar. If you agree to that and click the corresponding button, your avatar will be automatically uploaded to your Aristeem account.

● Your date of birth.

You can provide this information in your Account. This is optional. We will use your year of birth to evaluate the age group of our clients for marketing and business development purposes. The information will be securely stored on our servers together with other information related to you as our user. We will not share this information with any third party, unless it is shared on a completely anonymized basis without any references to other information related to you as a user or otherwise.

● Your real name.

We don’t aim to collect your real name. We’ll automatically collect it if you choose to set your real name as a username, and provide your real name in the “Contact Us” form or another contact form. It’s optional for you to provide your name, or if it’s not optional, you don’t have to provide your real name. **We don’t identify our users by their names.** If we happen to collect your real name, we will store it together and not use it for any purpose.

● Limited payment processing information.

You may make purchases and transactions within the Product, for e.g. to pay for your subscription. You do that using third-party payment operators like Stripe. They will be in charge of most of your data. We don’t collect any information related to your actual payment details. **We process only limited payment**

processing information on a hashed/anonymized basis. This includes the data on whether the transaction happened, it's status, type and amount, as well as what payment scheme or operator you've used. The payment system is in charge of all other information. Such payment systems may require you to provide your phone number, bank card number, real name, physical address, etc. We don't collect and/or access information. Check the privacy statement of the payment system you use to be aware of how it collects and uses your data.

We DO NOT collect information about your bank card number, bank account number, card holder's name, but we can see some of such data in our merchant accounts on payment system's websites. In case of a chargeback or dispute initiated by you or us, we will ask you to provide us with additional information, such as your postal address and phone number if requested by a payment operator, according to the payment operator's policies or Visa/Mastercard regulations. We will store such information only for the purposes of chargeback or dispute resolution and will delete it as soon as the chargeback or dispute is resolved.

● Your IP-address.

Your Internet Protocol address is a numerical label assigned to your device when it is connected to the Internet. We get this information automatically when you interact with our website, services or other software available online. We either collect your IP-address by ourselves, or it is provided to us by your browser.

● Your location.

We will collect data related to the location (country and city) from where you access our product to evaluate the geography of our product, design business development and scaling plans, improve our functionality, add new language profiles, evaluate the performance of our software, hardware and network in a particular area, fix technical issues you and other users in your area users may face while using the Product. These data are securely stored in our database on a completely anonymized basis, we don't share these data with any third party. We can also ask you about your location in our communication with you, if you address our support with a problem or a question and we will need to know what country (and/or city) you are based in to answer your question or fix your problem.

● Technical use to access the Product.

This includes your Internet and/or network connection (Internet speed, IP address); mobile device identifiers; operating system, browser type; your hardware details; technical details provided by your browser.

We will process this data to ensure that our Product interacts with your device in the most efficient way. This data helps us collect statistics about the devices our users use so we can improve the Product. We also need it in case of an error or issue, so that we can understand what kind of device or software experienced a problem and what we can do about that.

When you start using the Product, we connect you to the closest Aristeem server to ensure the best experience and minimal latency. This server may be located in your country or in other countries, regions, or even continents. The closer you are to the servers, the better your experience will be. Here's how we determine which server to connect you to: we evaluate the quality of the Internet connection between you and all the locations where our servers are hosted and choose the location that provides the best connection.

- Details of Your Use of the Product

This includes metrics data about when and how you use the Product, such as web traffic, purchase history, and your preferences and choices, including subscription type, preferred language, or currency.

For example, we collect and analyze data about your visits to our website to optimize its design and functionality.

We also collect technical logs and information about the applications you use (including those accessed via third-party platforms or launchers such as Microsoft Office, Adobe Suite, or other office software). This data includes:

- The date and time you access software,
- Duration of your sessions,
- Activities conducted on other platforms connected to your Aristeem account,
- Software added to your Aristeem account.

● Bug and error reports, and crash logs.

Our software automatically generates bug/crash reports to get information about software or hardware problems that may occur while you use the Product. This data includes your device type, operating system and browser type, network connection and how our software interacts with your device. We use such data to fix problems on the Product. We need it to identify the type of error or bug, where and why it occurs and how we can fix it. We use such data to provide you support. We may integrate third-party software to generate, collect, manage bug reports/crash logs. Such third-party software will not receive any of your data, except bug and crash-related data mentioned above. It will deal only with the software issues that occur while you use the Product. We'll always maintain the necessary level of data security when using third-party software.

● Data collected using cookies.

We collect Personal Data and other information from you by using cookies and other tracking technologies. Our use of these technologies is described in the Cookie Policy that you should check before using the Product. If you don't agree to our use of cookies, cease using the Product.

● Your communication.

We receive your communication with us via email and support chat, your messages and comments in internal blogs/forums. We also have access to your in-application chats to enable communication features while you use the Product.

We may intercept, record, and/or monitor any communication between you and us. We can do so to resolve queries in the future, for the purposes of security, staff training, complying with our legal responsibilities.

Please note that:

● We will NEVER ask you to send us any of your personal documents (passport, other ID, social security number, taxpayer number, birth/marriage certificate, driving license, health insurance, etc.). If somebody asks you to provide these documents on our behalf of us, never do that and contact us at info@aristeem.com as soon as possible.

● If we need any other data not specified here, we will ask you to provide such data, explain why we need it and what we will do with it. We will ask for your consent or explain other legitimate grounds of our collection and use of such data.

● Even if you only access our website and do not create the account, we will automatically gather information from your computer such as your IP address, browser type, referring/exit pages, and operating system.

7. Audio and Our Use of Your Microphone

The Product may provide microphone functionality, enabling you to communicate with others via audio in supported environments. This functionality is limited to real-time audio transmission from your device to the application environment and vice versa. **We do not record, save, or store any audio files from your communication.**

Our software accesses your microphone through your browser solely for the purpose of facilitating audio transmission. All audio signals, including your communication, are transmitted securely and cryptographically protected to ensure your privacy.

If you have concerns about microphone access, you can manage these permissions in your browser or device settings.

8. Sensitive Personal Data and information.

Never send us, and never disclose or make available any sensitive Personal Data and information including social security numbers, ethnic origin, religious or philosophical beliefs, political opinions, sex life and orientation, trade union membership, health-related information, biological characteristics, genetic data, biometrics, social background, family, criminal history, and/or any other information that you personally consider sensitive, as well as any other information that can be reasonably considered as sensitive.

If you disclose any sensitive Personal Data/information when uploading/posting user content to the Product, you are responsible for the consequences of such disclosure. This data will be collected by us and stored on our servers (as any user content you upload/post) and its processing will be considered as processing that relates to personal data which are manifestly made public by the data subject (you). We won't process such data for profiling, marketing, etc. We will share it with competent authorities if we are requested.

9. Social Network Accounts

You may log into the Product using social network accounts, such as Google, Apple or Facebook. These services will authenticate your identity and provide you with the option to share certain Personal Data with us such as your username, first name, last name, email address. On Facebook, you may use the dev console to manually manage the information that Facebook will provide to us when you log into the Product. On Google, you may manually manage the information Google will provide to us in the settings of your Google Account. Anyway, whichever information Google will provide us when you log in using Google, we will collect only your email. We do not need and will not use other information, like the first and last name specified on your Google Account.

When you sign up for the Product, you may add a link to your Facebook account. This is optional. We will not check your Facebook page and collect any information from it. This link will not be visible for other users on the Product or anywhere else on the Internet.

10. Third-party websites and platforms

The Product may contain links to and from third-party websites or services, such as platforms like Microsoft Office, Adobe Suite, or developers and publishers of office software accessible through the Product. Such third parties also collect personal data (like your email or name). This may include saving information to your account on the Product that is related to such third party websites and platforms (for e.g. saving software progress). This Policy does not apply to external websites, companies or providers, so please check their privacy notices.

11. Your Microsoft Office, Adobe, AutoCAD, etc. account information.

To access software through the Product, you will be required to log in to your account on a third-party platform or application. You will be redirected to the login page of such a platform or application, where you will enter your login credentials. We do not request, process, or store your third-party account information. This data is managed and processed solely by the respective third-party platform.

For example, if you wish to access Microsoft Office through Aristeem, you will need to log in to your Microsoft account. When you initiate Microsoft Office on Aristeem, you will be redirected to the Microsoft login page to enter your account details. Once logged in, you can access the software. We will not receive or store your Microsoft account login credentials.

Similarly, if you use Adobe Creative Suite, you will be redirected to Adobe's login portal, where you will enter your credentials. After successful authentication, you can access the software. We will not handle or retain any details related to your Adobe account. Any purchases, subscriptions, or agreements with third-party platforms remain between you and the platform provider, and Aristeem does not participate in or store details of such transactions.

If you agree by ticking the box, we can save your software platform account login and password (e.g., Microsoft Office, Adobe, AutoCAD), so you don’t have to enter them each time you log in. This data will be securely stored in our database on our servers. Each time you launch a software session and see a platform login page, our software will access this data, enabling you to log in automatically.

We will never share this data with any third party and will not use it in any way other than making it easier and faster for you to access the platform or software. All such data (as with any other user data in our database) is stored in encrypted form. This means we do not store your actual software platform password, but rather a hashed (encrypted) version that allows our software to automatically provide your login credentials when required.

If you do not want us to save your software platform account login and password, please do not tick the box.

12. Use of Your Personal Data

We will strive to collect only the data required for the purposes mentioned in this Policy (data minimization principle) and store it until it serves the purpose of its collection. If you think we do not comply with the data minimization principle, please contact us and report your concern. We use the Personal Data and other information that we collect for the following purposes:

• to comply with our legal or regulatory obligations, transaction recording, other compliance responsibilities, and reporting to regulators and competent authorities when applicable;

• to ensure the security of our network and software infrastructure;

• to conduct know your client and anti-money laundering checks on you, and associated financial crime and fraud monitoring if requested by competent authorities or required by law;

• to carry out our obligations under our contracts with you or others;

• to protect you from unauthorized use of your account;

We have a legitimate interest in ensuring that the Product operates effectively, and to do this we may use your Personal Data:

• to monitor, improve, and administer the Product;

• to contact you to ensure customer satisfaction with respect to our role as a platform and service provider and assist you in getting the best value from our services;

• to respond to customer support or other inquiries requesting information.

We also have an interest in communicating with you and others, publicizing our business, and making sure that our marketing, advertising, and content are effective, so we will use your Personal Data and other information we collect from you:

• for direct marketing (you have the right to object to direct marketing at any time for free); • to conduct surveys, and analysis;

• to evaluate the popularity and performance of the Product;

• to advertise, publicize, promote the Product and our business, and to measure, understand, or improve the effectiveness of advertising we provide to you and others;

• to create and share informative content about our business or the industry in which we operate;

• to provide you with news, and updates about the Product, our business and our industry;

• in certain circumstances, we may seek your consent to use your Personal Data for any specific purpose. We will ask you to confirm a separate consent to your Personal Data being processed for a specific purpose, either through the Product or by other means. We can create anonymous data records from Personal Data by excluding information that can identify you personally. Such anonymous data derives from personal data rendered anonymous in such a manner that the data subject (you) is not or no longer identifiable. So, it will be impossible for anyone to use such anonymous data to identify you. We will use such anonymous data to analyze request and usage patterns so that we can enhance the content, improve the Product and its navigation. We may use such anonymous data for any purpose and disclose it to third parties.

13. Storage and Transfer of your Personal Data, Security

Your Personal Data and other information related to you and your account will be stored as long as you have your account. When your account is deleted, all your data will be deleted too. Erasure of your data and stop of its processing upon your request may lead to the inability to use the Product.

We will carefully explain to you all the consequences of the erasure or stop of the processing in each particular case. We will retain technical information related to your account and your use of the Product after your account is deleted, provided that such information contains no Personal Data.

The Personal Data collected by us will be normally used by us. We share the Personal Data with our affiliates and trusted partners within our corporate family, third parties with which we have partnered to allow you to integrate their services into the Product, and with trusted third-party service providers as necessary for them to perform services on our behalf. We only share your Personal Data when necessary for any third party to provide the services as requested or needed on our behalf. These third parties are subject to all applicable data processing terms and are prohibited from utilizing, sharing or retaining your Personal Data for any purpose other than as they are specifically contracted for or without your consent. The data we collect from you may be transferred to and stored on our servers located outside your country of residence, the EU, or the European Economic Area ("EEA") and Switzerland. It may also be processed by staff operating outside the EEA and working for us or one of our suppliers. Such staff may be engaged in the processing of your data, maintaining servers where it is stored, and customer support. Any potential transfer of Personal Data outside the EEA will be done in accordance with GDPR. By consenting to this Policy, you agree to this transfer, storing or processing. We will take all steps necessary to ensure that your data is treated securely and in accordance with this Policy and GDPR. We will ensure

that your rights will remain enforceable and effective legal remedies will be available to you following the transfer. We endeavor to take all reasonable steps to protect your data. We also require that our employees and agents undergo mandatory data protection training. However, we cannot guarantee the security of any data you disclose online. In using the Product, you agree that you will not hold us responsible for any breach of security unless we fail to fulfill our obligations.

14. Transfer of Personal Data and Other Information outside the EEA

The EEA means European Economic Area. It includes all EU member states and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland). The UK remained a part of EEA until December 31, 2020.

Way may transfer your Personal Data and other information we collect from you outside the EEA. **By consenting to this Policy, you agree to this transfer**.

The GDPR, other relevant EU laws, rules and regulations, as well as rules and procedures set forth in this Policy will always apply to your Personal Data and other information we collect from you regardless of where your data is transferred.

Your Personal Data and other information may be transferred outside the EEA only to our representatives and agents who provide services to us on to you on our behalf. Such representatives and agents will receive only the data necessary for the provision of their services. These services always constitute a part of the services you get when using the Product. These services include technical support and maintenance and customer support. The GDPR, other relevant EU laws, as well as rules and procedures set forth in this Policy are binding to all our representatives and agents who may access your Personal Data and other information. All enforceable rights and effective legal remedies remain fully available for you with regard to the transfer of your Personal Data and other information outside the EEA.

15. Corporate Restructuring, M&A

If any other company acquires our company, business, assets, this company will possess your Personal Data collected by us and will assume the rights and obligations regarding your Personal Data as described in this Policy.

16. Your Data Protection and Privacy Rights

You have the right to **access your data** which means you can see what data we have collected whenever you want.

You **can request a copy** of all your personal and other data we hold. We will provide such a copy for free but we will charge a reasonable fee if you ask for more than one copy of the same data. In that copy, we'll also explain how and why we use your data.

You have the right to data portability that assumes your data can be easily transferred to another organization.

You can request rectification or erasure of Personal Data. We will rectify or delete your data free of charge upon your request unless keeping your data is required for our legal and regulatory compliance. Even if you don't ask us to delete your data, we will stop keeping it if we no longer need it for the purposes described in this Policy.

You can object to our processing of your data. We will stop processing it upon your request unless the processing is required for legal and regulatory compliance. We will carefully explain to you the consequences you might face after we stop processing your data upon your request in each particular case.

You can object to direct marketing or other kinds of communication we send to you at any time free of charge. Simply click “Unsubscribe” or a similar button where applicable, or contact us at info@aristeem.com .

Where you have provided your consent to the processing of your data, you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we did prior to your withdrawal and will not affect the processing of your information conducted on lawful grounds other than consent.

You have the right to contact the appropriate authority to protect your privacy. We kindly ask you to contact us first if you have any concerns about how we use your data, so we can try to resolve the issue. However, you can always report a complaint.

You can contact the Texas Attorney General's Consumer Protection Division at 1-800-621-0508 or visit www.texasattorneygeneral.gov. Additionally, you may contact the Federal Trade Commission (FTC) at 1-877-FTC-HELP (1-877-382-4357) or visit www.ftc.gov.

You can stop all collection of your data by our mobile app or our web/desktop software by uninstalling the app or such software at any time. Use standard uninstall processes available in your mobile device, PC or another device, the mobile app store or network.

If we need or are required to confirm your identity to provide you with the opportunity to exercise your rights, we’ll request additional information from you to verify your identity. GDPR and other applicable data protection laws may provide you with other rights we have not explicitly covered in this Policy.

To send a request for a copy of your data, to tell us to delete/rectify your data, to withdraw the consent, and to exercise any other rights, please contact us at info@aristeem.com.

17. Changes to the Policy

We update this Policy from time to time, so we encourage you to review it frequently. We won’t notify you about the changes unless they are significant. “Last Updated” legend above indicates when the Policy was last changed. The changes will become effective after they are posted on our website. If you do not agree to the changes, please cease using the Product.

18. Contact Information

If you have any questions about the Product, the Policy, our use of your personal data and other information, or should you require any clarifications or assistance, please contact us at info@aristeem.com or via the support chat in the lower right corner of our website. Typically, you will have a reply in the support chat within 1-2 minutes.

19. Third-party Privacy Statements

The Product contains links to and from other websites, platforms, and services. Your Aristeem account may be connected to your accounts on other services, such as Microsoft Office, Adobe, AutoCAD, or other third-party software platforms.

You make transactions using third-party payment systems. It all means that while you use the Product, your data will be collected by these third-party websites, platforms, services, and their privacy policies will apply to you. Please, check the privacy statements of third-party services to get the full picture of your privacy. Here are some of the privacy statements that may be useful for you:

Visa Global Privacy Notice

Mastercard Global Privacy Notice

Microsoft Privacy Policy (for Microsoft Office applications)

Adobe Privacy Policy (for Adobe Suite software)

Autodesk Privacy Policy (for AutoCAD and other Autodesk products).

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