

Privacy policy

We at BQS Consulting Ltd (Operating as KYNOBY) (together with our affiliates, "KYNOBY," "we," "our," or "us") value your privacy and are fully committed to safeguarding any information we receive from you or acquire about you. This Privacy Policy outlines our procedures concerning Personal Information gathered from or related to you when you utilise our website and services (collectively referred to as the "Services"). Please note that this Privacy Policy does not apply to the content we handle on behalf of our business clients, such as our API. The use of that data is governed by our customer agreements, which cover access to and utilisation of those offerings.

For details regarding how we gather and utilise training information to enhance our language models that empower PrivacyGPT and other Services, as well as the choices available to you concerning that information, please consult this help centre article.

1. Personal information we collect

- **Personal Information You Provide:** If you create an account to access our Services or communicate with us, we may collect Personal Information as described below:
- **Account Information:** When you create an account, we collect information associated with it, including your name, contact details, account credentials, payment card information, and transaction history ("Account Information").
- **User Content:** As you use our Services, we may collect Personal Information included in the input, file uploads, or feedback you provide ("Content").
- **Communication Information:** If you engage in communication with us, we may collect your name, contact information, and the content of your messages ("Communication Information").
- **Social Media Information:** We may maintain pages on various social media platforms like Instagram, Facebook, Medium, Twitter, YouTube, and LinkedIn. When you interact with our social media pages, you may provide us with Personal Information, such as your contact details ("Social Information"). Additionally, the companies hosting our social media pages may furnish us with aggregate data and analytics pertaining to our social media activity.
- **Personal Information We Automatically Receive from Your Use of the Services:** When you visit, utilise, and interact with our Services, we may automatically receive the following information regarding your visit, use, or interactions ("Technical Information"):
 - **Log Data:** Information automatically transmitted by your browser whenever you access our website ("log data"). Log data encompasses your Internet Protocol (IP) address, browser type and settings, the date and time of your request, and your interactions with our website.
 - **Usage Data:** We may automatically collect information about your usage of the Services, such as the types of content you view or engage with, the features you utilise, and the actions you take. This may include your time zone, country, access dates and times, user agent and version, device type, computer connection, IP address, and similar details.
 - **Device Information:** This includes the name of the device, operating system, and browser you are using. The information collected may depend on the type of device and its settings.

- **Cookies:** In order to operate and manage our Services and enhance your experience, we utilise cookies. A "cookie" is a piece of data sent to your browser when you visit a website. You have the option to accept all cookies, reject all cookies, or receive notifications whenever a cookie is offered, allowing you to decide whether to accept it on a case-by-case basis. However, declining cookies may, in some cases, prevent you from using certain areas or features of a website or negatively impact its display or functionality. For more information on cookies, please refer to the "All About Cookies" resource.
- **Analytics:** We may employ various online analytics tools that use cookies to help us analyse user behaviour and improve your experience while using our Services.

2. How we use personal information

At KYNOBY, we may utilise Personal Information for the following purposes:

- Provision, administration, maintenance, and analysis of the Services.
- Improvement of our Services and conducting research.
- Communication with you.
- Development of new programs and services.
- Prevention of fraud, criminal activities, or misuse of our Services, and ensuring the security of our IT systems, architecture, and networks.
- Compliance with legal obligations, legal processes, and protection of our rights, privacy, safety, or property, as well as those of our affiliates, you, or other third parties.

Aggregated or De-Identified Information: We may aggregate or de-identify Personal Information and use the resulting anonymized data for analysing the effectiveness of our Services, enhancing and adding features, conducting research, and similar purposes. Occasionally, we may analyse general user behaviour and characteristics within our Services and share aggregated information, such as general user statistics, with third parties. This aggregated information may be published or made generally available. Aggregated information can be collected through the Services, cookies, and other methods outlined in this Privacy Policy. De-identified information will be maintained and used in an anonymous or de-identified form, without attempts to re-identify the information.

As mentioned earlier, we may use the Content you provide to us to enhance our Products and Services. However we will not be using content to train any AI models.

3. Disclosure of personal information

Under certain circumstances, KYNOBY may disclose your Personal Information to third parties without providing you with further notice, unless required by law. These circumstances include:

- **Vendors and Service Providers:** In order to fulfil our business operational needs and carry out specific services and functions, we may disclose Personal Information to vendors and service providers. This includes providers of hosting services, cloud services, IT services, event management services, email communication software and newsletter services, and web

analytics services. These parties will access, process, or store Personal Information solely for the purpose of fulfilling their obligations to us, in accordance with our instructions.

- **Business Transfers:** In the event of strategic transactions, reorganisation, bankruptcy, receivership, or transitioning services to another provider (collectively referred to as a "Transaction"), your Personal Information and other data may be disclosed during the due diligence process to counterparties and other parties involved in the Transaction. It may also be transferred to a successor or affiliate as part of that Transaction, along with other assets.
- **Legal Requirements:** We may disclose Personal Information if required to do so by law or in good faith belief that such action is necessary to (i) comply with legal obligations, including national security or law enforcement requirements, (ii) protect and defend our rights or property, (iii) prevent fraud, (iv) respond to urgent circumstances to safeguard the personal safety of Services users or the general public, or (v) protect against legal liability.
- **Affiliates:** We may disclose Personal Information to our affiliates, which refers to entities that control, are controlled by, or are under common control with KYNOBY. Our affiliates will handle the Personal Information we share in a manner consistent with this Privacy Policy.

4. Your rights

Depending on your location, individuals in the EEA, the UK, and worldwide may possess certain statutory rights regarding their Personal Information. These rights include:

- Access to your Personal Information.
- Deletion of your Personal Information.
- Correction or update of your Personal Information.
- Transfer of your Personal Information to another location.
- Withdrawal of consent for the processing of your Personal Information when consent is the legal basis for processing.
- Objecting to or restricting the processing of your Personal Information when legitimate interests are the legal basis for processing.

You can exercise some of these rights through your KYNOBY account. If you are unable to do so through your account, please send your request to contactus@KYNOBY.com.

Note regarding accuracy: Please note that Kynoby operates as a broker and is not accountable for the outputs generated as we use models from other vendors. We cannot take responsibility for the accuracy of the outputs generated by those AI models. However, if you come across any inaccuracies, we are more than willing to assist in resolving the issue. Please contact us on contactus@KYNOBY.com

KYNOBY - 5. UK Privacy Rights

Under UK data protection laws, individuals have certain privacy rights in relation to their personal information. These rights include:

- **Right to be Informed:** Individuals have the right to be informed about the collection and use of their personal data. This includes information about the categories of personal information collected and the purposes for processing.
- **Right of Access:** Individuals have the right to request access to their personal data and obtain information about how it is processed. This includes the right to request a copy of the personal information held about them.
- **Right to Rectification:** Individuals have the right to request the correction or updating of their inaccurate or incomplete personal data.
- **Right to Erasure (Right to be Forgotten):** Individuals have the right to request the deletion of their personal data under certain circumstances, such as when the data is no longer necessary for the purpose for which it was collected or if the individual withdraws their consent.
- **Right to Restrict Processing:** Individuals have the right to request the restriction of processing their personal data in certain situations, such as when the accuracy of the data is contested or when the processing is unlawful.
- **Right to Data Portability:** Individuals have the right to receive their personal data in a structured, commonly used, and machine-readable format, and have the right to transmit that data to another data controller where technically feasible.
- **Right to Object:** Individuals have the right to object to the processing of their personal data based on legitimate interests or for direct marketing purposes.
- **Rights in Relation to Automated Decision Making and Profiling:** Individuals have the right not to be subject to decisions based solely on automated processing, including profiling, which produce legal or significant effects concerning them.

To exercise these rights or obtain more information, individuals can contact contactus@KYNoby.com

6. Children

Our Service is not intended for individuals under the age of 13. KYNOBY does not knowingly collect Personal Information from children under the age of 13. If you have any reason to believe that a child under the age of 13 has provided Personal Information to KYNOBY through the Service, please

contact us at contactus@KYNoby.com. We will promptly investigate any such notification and, if necessary, delete the Personal Information from our systems. If you are 13 years of age or older but under 18, you must obtain consent from your parent or guardian to use our Services.

7. Links to other websites

The Service may include links to other websites that are not operated or controlled by KYNoby, including social media platforms ("Third-Party Sites"). The privacy policies and terms of service of these Third-Party Sites will govern any information you share with them, and they are independent of this Privacy Policy. KYNoby does not imply endorsement or review of these sites by providing the links. For information on the privacy practices and policies of Third-Party Sites, please contact them directly.

8. Security and Retention

We employ reasonable technical, administrative, and organisational measures, in line with industry standards, to safeguard Personal Information against loss, misuse, unauthorised access, disclosure, alteration, or destruction, both online and offline. However, it is important to note that no transmission over the Internet or email can be guaranteed to be completely secure or error-free. Therefore, exercise caution when deciding what information to send to us through the Service or via email. Additionally, we cannot be held responsible for any circumvention of privacy settings or security measures on the Service or third-party websites.

We will retain your Personal Information only for as long as necessary to provide our Service to you or for other legitimate business purposes, such as resolving disputes, ensuring safety and security, or complying with legal obligations. The duration of retention will depend on various factors, including the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorised use or disclosure, our purpose for processing the information, and any applicable legal requirements.

Furthermore, we may anonymize or de-identify your Personal Information (rendering it untraceable to you) for research or statistical purposes, as explained earlier. In such cases, we may use this information indefinitely without providing you with further notice.

9. International users

By using our Service, you acknowledge and understand that your Personal Information may be transferred from your location to our facilities and servers located in the United Kingdom.

For international users outside the United Kingdom:

- **Legal Basis for Processing:** Our company relies on various legal bases to process your Personal Information, which include:
- **Contractual Performance:** When we provide and maintain our Services, we process your Account Information, Content, and Technical Information as necessary to fulfil our

contractual obligations. If you choose not to provide this information, it may affect our ability to provide you with the Services.

- **Legitimate Interests:** We process your Personal Information based on our legitimate interests, which include protecting our Services from abuse, fraud, or security risks, as well as developing, improving, or promoting our Services. This may involve processing Account Information, Content, Social Information, and Technical Information. Instructions on how to opt out of the use of your information for training our models can be found on our website.
- **Consent:** In certain circumstances, we may seek your consent to process your Personal Information for specific purposes. You have the right to withdraw your consent at any time.
- **Compliance with Legal Obligations:** We may process your Personal Information to comply with applicable laws or to protect our rights, safety, and property, as well as the rights, safety, and property of our affiliates, users, or third parties.
- **Data Transfers:** If we need to transfer Personal Information outside of your country or region, we will use appropriate safeguards to ensure the security and privacy of your information.
- **Data Controller:** For purposes of data protection laws, our company acts as the data controller. If you have any questions or concerns regarding the processing of your Personal Information, please contact us using the provided contact information.
- If you have any concerns that we have not adequately addressed, you have the right to file a complaint with the appropriate regulatory authorities in your country or region.

10. Changes to the privacy policy

KYNOBY reserves the right to modify this Privacy Policy at any time. If changes are made, an updated version will be posted on this page, unless otherwise mandated by applicable law. By continuing to use our Service or providing us with Personal Information after an updated Privacy Policy has been posted or you have been notified through other means, you consent to the revised Privacy Policy.

11. How to contact us

Please email contactus@KYNoby.com if you have any questions or concerns not already addressed in this Privacy Policy.

END OF PRIVACY POLICY