



PRIVACY POLICY

Last Updated: April 18, 2025

This Privacy Notice ("Privacy Notice" or "we") describes how and why we might collect, store, use, and/or share ("process") your information when you use our services ("Services"), such as when you:

- Visit our website at <https://www.terratrust.ai/>, or other websites and services owned and operated by us that link to this Privacy Notice
- Engage with us in other related ways, including any sales, marketing, or analytics purposes

Questions or concerns? Reading this Privacy Notice will help you understand your privacy rights and choices. We are responsible for making decisions about how your personal information is processed. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at support@terratrust.ai.

SUMMARY OF KEY POINTS

This summary provides quick insight from our Privacy Notice, but you can find out more details about these topics by clicking the link following each key point or by reading the full table of contents below to find the sections you are looking for.

What personal information do we process? When you visit, use, or navigate our Services, we may process personal information depending on how you interact with Terra Ops, Inc. and the Services, the choices you make, and the products and services you use.

Do we process any sensitive personal information? Some of the personal information we process may constitute sensitive personal information ("sensitive personal information") or other special categories of personal data (collectively, "sensitive personal information") with the meaning of applicable law. We process sensitive personal information only when necessary and with your consent or as otherwise permitted by applicable law.

Do we collect any information from third parties? We may collect information through public databases, marketing partners, social platforms, and other outside sources.

How do we process your information? We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law.

In what situations and with which types of parties do we share personal information? We may share information in specific situations and with specific categories of third parties.

How do we keep your information safe? We have organizational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third



parties will not be able to defeat our security and improperly collect, access, steal, or modify your information.

What are your rights? Depending on where you are located geographically, the privacy laws may mean you have certain rights regarding your personal information

How can you exercise your privacy rights? The easiest way to exercise your rights is by emailing us at support@terratrust.ai. We will consider and act upon any request in accordance with applicable data protection laws. Want to learn more about what we do with any information we collect? Review the Privacy Notice in full.

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1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

In Short: We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you register on the Services, express an interest in obtaining information about us or our products and services, when you participate in activities on the Services, or otherwise when you contact us. When you use our AI-powered features, we process your data using private versions of AI engines, and your data is never ingested into or used by public AI models.

The personal information we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and services you use. The personal information we collect may include the following:

- name



- phone number
- email address
- mailing address
- job title
- username
- password
- contact preferences
- billing address
- debit/credit card numbers
- and other similar information

Sensitive Information

In Short: We do not process sensitive information.

Terra Ops, Inc. does not collect necessary sensitive information and payment information you provide. All payment information is processed and stored by a third-party payment processor. You may find their privacy notice link here: <https://stripe.com/legal/privacy-center>

Information automatically collected

In Short: Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Services.

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as:

- IP address
- browser and device characteristics
- operating system
- language preferences
- referring URLs
- device information (e.g., device name, model)
- information about how you interact with the Services
- time zone
- date and time of your visit
- pages visited
- click data
- search terms

This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Information collected through cookies and similar technologies.

Like many businesses, we also collect information through cookies and similar technologies.



Information collected from other sources

In Short: We may collect limited data from public databases, marketing partners, and other outside sources.

We may obtain information about you from other sources, such as public databases, joint marketing partners, and other third parties.

2. HOW DO WE PROCESS YOUR INFORMATION?

We process your information for the following purposes, and we communicate with you, our services and products, and to comply with the law. Some of your data may be used to train our private AI models in an anonymized manner, always in accordance with this Privacy Policy. We may also process your personal information for a variety of reasons, depending on how you interact with our services, including:

- To facilitate account creation and authentication and authenticate users accounts. We process your information to create, log in to your account, and as keep your account working order.
- To deliver and facilitate delivery of services. We process your information to provide with the requested services.
- To respond to user inquiries and offer support to the users. We process the information to respond to inquiries and any potential issues you might have with our services.
- To send administrative information to you. We process your information to send you details about our products and services, changes to our terms and policies, and other similar information.
- To fulfill and manage your orders. We process your information to fulfill and send you your orders, payments, returns, and exchanges made through our Services.
- To enable user-to-user communications. We process your information if you choose to use any of the offerings that allow communication with other users.
- To request feedback. We process your information when necessary to request feedback and to contact you about your use of our Services.
- To send you marketing and promotional communications. We process your personal information if you have given consent to receive marketing materials.
- To protect Services. We process your information for our part to use Services and security, including fraud monitoring and prevention.
- To identify usage trends. We process information about how you use our services to better understand they are being used to improve them.
- To save or protect an individual's interest. We process your information when necessary to save an individual's interest, as well as to prevent harm.

3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

In Short: We only process your personal information when we believe it is necessary and we have a valid legal reason to do so under applicable law with your consent, to comply with laws, to provide you with services to enter into or fulfill our contractual obligations, protect your rights, or fulfill our legitimate business interests.



If you are located in the EU or UK, this section applies to you:

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may process your personal information under the following situations:

- Where we have your consent to do so.
- Where the processing is necessary to perform a contract (i.e., when we have a contract with you).
- Where it is necessary for our legitimate interests (unless those interests are overridden by your fundamental rights and interests).
- Where we need to comply with a legal obligation.

Please note that under some circumstances we may be legally permitted to process certain data without your consent or prior notice if such processing is permitted under applicable law.

We may process personal information for additional purposes with your consent where and when appropriate, including the following:

- Marketing and advertising (further information is provided below on how we use data for these purposes).
- To offer and provide you with information and services to improve our engagement and relationships with you and our services.
- To analyze how our services are used and improve them to engage and relate to users.

Under the legal obligations, we use your products and services to engage with you in compliance with applicable laws.

Legal Obligations: We process your information where it is necessary to comply with our legal obligations with our legal obligations to government agencies.

- Diagnose problems and enhance and improve our services from engaging and relating to users.
- Understand our users use our products and services to engage with you in compliance with applicable laws.

Legal Interests: We process your information where it is necessary to protect your interests or the interests of a third party, such as in cases of potential fraud.

- We are required by law to process your personal information to protect your interests or those of another individual.

If you are located in Canada, this section applies to you:

This section applies to the collection, use, and disclosure of personal information in accordance with applicable federal and provincial privacy laws.



Personal information includes information about an identifiable individual but does not include business contact information where such information is collected, used, or disclosed solely for the purpose of communicating or facilitating communication with that individual.

Personal information does not include information that is publicly available from a source that is in the public domain.

If the information is collected by a not-for-profit organization for the purpose of raising funds, the organization must comply with the applicable fundraising laws.

If the information is collected by an individual who is acting in their personal capacity and not as an agent or employee of an organization, the individual must comply with the applicable laws.

If the information is collected by an organization for the purpose of investigating a breach of an agreement or contravention of the laws of Canada or a province and the collection is reasonable for that purpose, the organization may collect the information.

If the information was provided in an emergency situation where the individual's life, health, or security is threatened, the organization may collect the information.

If the information is publicly available and is collected by a government institution or organization for the purpose of law enforcement, the collection is permitted.

If the collection is solely journalistic, artistic, literary purposes and the information was provided voluntarily by the individual, the collection is permitted.

If the information is publicly available or is collected by a public body under the authority of an Act or regulation, the collection is permitted.

4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

In Short: We may share information in specific situations described in this section and with the following categories of third parties.

We have outlined the categories of third-party service providers we may share your data with and why we share it below:

Vendors, Consultants, and Other Third-Party Service Providers: We may share your data with third-party vendors, service providers, contractors, agents (third parties) who needs this information to perform services on our behalf. These may include payment processors, data analysts, hosting and other IT professionals, customer service and support providers, and marketing partners.

The categories of third parties we may share your personal information with are:

- Ad Networks
- Affiliate Marketing Programs
- Cloud Computing Services



- Communication & Collaboration Tools
- Data Analytics Services
- Data Storage Service Providers
- Order Fulfillment Service Providers
- Payment Processors
- Performance Monitoring Tools
- Product Engineering & Design Tools
- Sales & Marketing Tools
- Social Networks
- Testing Tools
- User Account Management
- Website Hosting Service Providers
- With Business Partners: We may share your information in connection with or during negotiations of any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- With Affiliates: We may share your information with affiliates in which case we will require those affiliates to honor this Privacy Notice. Affiliates include our parent company and any subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.
- With Business Partners: We may share information with our business partners to offer you certain products, services, or promotions.

5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

In Short: We may use cookies and other tracking technologies to collect and store your information.

We may use cookies and similar tracking technologies (like web beacons and pixels) to gather information when you interact with our Services. Some tracking technologies are necessary to provide the services, while others are used to improve your experience by enabling features or helping us understand how our Services are used.

The specific cookies and tracking technologies we use include:

- Essential cookies that are necessary for the functioning of the website.
- Analytics cookies that help us understand how you use our Services and allow us to improve them.
- Advertising cookies that enable us to deliver relevant ads and measure their effectiveness.
- Social media cookies that allow you to share content on social platforms.

You can manage your cookie preferences through your browser settings or by contacting us directly.

DO UNITED STATES RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

In Short: If you are a resident of certain U.S. states, you may have additional privacy rights.



Google Analytics

We may share your information with Google Analytics to track and analyze the use of our Services. Google Analytics Advertising Features that we may utilize include:

- Google Analytics for Display Advertisers
- Google Display Network Impression Reporting
- Google Analytics Demographics and Interest Reporting
- Integrated services that require Google Analytics to collect data for advertising purposes, including the collection of data via advertising cookies and identifiers.

For more information on how Google uses your data, please review Google's Privacy Policy. You can opt out of Google Analytics Advertising Features by visiting Google's Ads Settings or downloading the Google Analytics Opt-out Browser Add-on.

6. DO WE OFFER ARTIFICIAL INTELLIGENCE-BASED PRODUCTS?

In Short: We offer products, features, or tools powered by artificial intelligence, machine learning, or similar technologies.

As part of our Services, we offer products, features, or tools powered by artificial intelligence, machine learning, or similar technologies (collectively, "AI Products"). These tools are designed to enhance your experience and provide you with innovative solutions. The terms in this Privacy Notice govern your use of our AI Products within our Services.

Use of AI Technologies

We provide the AI Products through private instances of third-party service providers ("AI Service Providers"), including Amazon (Web Services (AWS)), Anthropic (Claude), Intercom, and Snowflake. AI Service Providers may be added or removed without notification. As outlined in this Privacy Notice, your input, output, and personal information will be shared with and processed by these AI Service Providers to enable use of our AI Products for purposes outlined in "WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR PERSONAL INFORMATION?" You must not use the AI Products in any way that violates the terms or policies of any AI Service Provider.

Our AI Products

Our AI Products are designed for the following functions:

- AI applications
- AI automation
- AI bots
- AI deployment
- AI development
- AI document generation
- AI insights
- AI predictive analytics



- AI processing
- AI translation
- Machine learning models
- Natural language processing
- Text analysis

How We Process Your Data Using AI

All personal information processed using our AI Products is handled in line with our Privacy Notice and our agreement with third parties. This ensures high security and safeguards your personal information throughout the process, giving you peace of mind about your data's safety.

How to Opt Out

We believe in giving you the power to decide how your data is used. To opt out, you can:

- Contact us using the contact information provided

7. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?

In Short: We may transfer, store, and process your information in countries other than your own.

Our servers are located in the United States. Please be aware that your information may be transferred to, stored by, and processed by us in our facilities and in the facilities of the third parties with whom we may share your personal information (see "WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?" above), including the United States, and other countries.

If you are a resident in the European Economic Area (EEA), United Kingdom (UK), or Switzerland, then these countries may not necessarily have data protection laws or other similar laws as comprehensive as those in your country. However, we will take all necessary measures to protect your personal information in accordance with this Privacy Notice.

European Commission's Standard Contractual Clauses

We have implemented measures to protect your personal information, including by using the European Commission's Standard Contractual Clauses for transfers of personal information between our group companies and between us and our third-party providers. These clauses all require that the recipient protect all personal information that they process originating from the EEA or UK in accordance with European data protection laws and regulations. We have implemented similar appropriate safeguards with our third-party service providers and partners and further details can be provided upon request.

8. HOW LONG DO WE KEEP YOUR INFORMATION?

Commented [MD1]: Somewhere in here we should mention that we use private versions of these AI engines and that their data is never ingested into or used by public AI models.

We also might want to mention that their data is used to train these private models but we do so in an anonymize way. Their data is never displayed with or shared with others but I think you mentioning that we do this in accordance with our Privacy Policy covers this off.

Commented [KW2R1]: Thanks. We've made a few edits to make this clear.

Commented [MD3]: I'm not sure that we can really let them opt out. Probably remove this. We're a data and analytics company and AI is at the core of everything we do.

Commented [KW4R3]: If we want to be compliant with GDPR, CCPA and a lot of other regulations, it can't be removed.

Commented [MD5]: They are right now but they could be international as well at some point. I guess we can always update the policy at that time.

Commented [KW6R5]: Yes.



In Short: We keep your personal information for as long as necessary to fulfill the purposes outlined in this Privacy Notice unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than twelve (12) months past the termination of your account.

We will only keep your personal information for as long as it is necessary for the purposes set out in this Privacy Notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than twelve (12) months past the termination of your account.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

9. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, electronic transmission over the Internet or information storage technology cannot be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will be unable to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

10. DO WE COLLECT INFORMATION FROM MINORS?

In Short: We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under 18, please contact us at support@terratrust.ai.

11. WHAT ARE YOUR PRIVACY RIGHTS?

- A. Disclosing your privacy rights in the U.S., in regions such as the European Economic Area (EEA), United Kingdom (UK), Switzerland, and Canada, have rights related to the



collection, use, and protection of your personal information. This may vary depending on your country, province, state of residence.

- In some regions (like the EEA, UK, Switzerland, and Canada), you have certain rights under applicable data protection laws. These may include the right to request access to a copy of your personal information, (ii) request rectification or erasure, (iii) to restrict processing of your personal information, (iv) data portability, (v) to object to processing by using the contact details provided in the “HOW CAN YOU CONTACT US ABOUT THIS NOTICE?” below. We will attempt to fulfill your request as soon as reasonably practicable.
- If you are located in the EEA or UK and believe we are unlawfully processing your personal information, you also have the right to complain to your Member State’s data protection authority or EEA data protection authority.
- If you are located in Switzerland, you may contact the Federal Data Protection and Information Commissioner.
- Withholding your consent (if we are relying on your consent to process your personal information, which may be express and implied consent depending on the applicable laws) will not limit your ability to access or use our Service once you withdraw your consent.
- “HOW CAN YOU CONTACT US ABOUT THIS NOTICE?” below. We then will be notified from our marketing. However, we may communicate with you for customer support purposes or other non-marketing purposes.
- Account information
- If you are at any time to review or change the information in your account or terminate your account, you can:
- Contact us using the contact information provided.
- Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain the information in our archives. To protect your privacy, we have taken steps to ensure that the information is not actively used by us.
- Cookies and similar technologies: Most Web browsers are set to accept cookies by default. You can remove or reject cookies, but that might limit your ability to use or access certain features or areas of our Service.
- If you have questions or comments about your privacy rights, you may email us at support@terratrust.ai.

12. CONTROLS FOR DO-NOT-TRACK FEATURES

- Do Not Track (“DNT”) is a technology that sends a signal to websites and online services, including ours, when a user’s web browser is set to refusing to be tracked. At this stage, uniform technology standard for recognizing and honoring DNT signals has not been finalized. As a result, we do not currently respond to DNT browser signals or other mechanisms that automatically communicate your choice not to be tracked online.
- California law requires us to let you know how we respond to DNT signals. Because there is currently not an industry standard for recognizing or honoring DNT signals, we do not respond to them at this time.

13. DO UNITED STATES RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?



- A. If you are a resident of California, Colorado, Connecticut, Delaware, Florida, Hawaii, Kansas, Kentucky, Maine, Maryland, Massachusetts, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, Oregon, Rhode Island, Tennessee, Texas, Utah, or Virginia, you may have the right to request access to and delete your personal information. You also have the right to withdraw your consent to our collection and use of your personal information. These rights may be limited in some circumstances by applicable law. More information is provided below.
- Categories of Personal Information We Collect
- We have collected the following categories of personal information in the past twelve (12) months:

Category	Examples
A. Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number
B. Personal information categories defined in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Name, contact information, education, employment, employment history, financial information, medical information, or health insurance information

Your Rights

You have rights under certain US state data protection laws. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law. These rights include:

- Right to know whether or not we are processing your personal data
- Right to access your personal data
- Right to correct inaccuracies in your personal data
- Right to request the deletion of your personal data
- Right to obtain a copy of the personal data previously shared with us
- Right to non-discrimination for exercising your rights
- Right to opt out of the processing of your personal data if it is used for targeted advertising (or sharing as defined under California's privacy law), the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects ("profiling")

Depending on the state where you live, you may also have the following rights:

- Right to access the categories of personal data being processed (as permitted by applicable law, including the privacy law in Minnesota)



- Right to obtain a list of the categories of third parties to which we have disclosed personal data (as permitted by applicable law, including the privacy law in California, Delaware, and Maryland)
- Right to obtain a list of specific third parties to which we have disclosed personal data (as permitted by applicable law, including the privacy law in Minnesota and Oregon)
- Right to review, understand, question, and correct how personal data has been profiled (as permitted by applicable law, including the privacy law in Minnesota)
- Right to limit use and disclosure of sensitive personal data (as permitted by applicable law, including the privacy law in California)
- Right to opt out of the collection of sensitive data and personal data collected through the operation of a voice or facial recognition feature (as permitted by applicable law, including the privacy law in Florida)

How to Exercise Your Rights

To exercise these rights, you can contact us by emailing us at support@terratrust.ai or by referring to the contact details at the bottom of this document.

Under certain US state data protection laws, you can designate an authorized agent to make a request on your behalf. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with applicable laws.

Request Verification

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. We will only use personal information provided in your request to verify your identity or authority to make the request. However, if we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity and for security or fraud-prevention purposes.

If you submit the request through an authorized agent, we may need to collect additional information to verify your identity before processing your request and the agent will need to provide a written and signed permission from you to submit such request on your behalf.

Appeals

Under certain US state data protection laws, if we decline to take action regarding your request, you may appeal our decision by emailing us at support@terratrust.ai. We will inform you in writing of any action taken or not taken in response to the appeal,



including a written explanation of the reasons for the decision. If your appeal is denied, you may submit a complaint to your state attorney general.

California “Shine The Light” Law

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us by using the contact details provided in the section “HOW CAN YOU CONTACT US ABOUT THIS NOTICE?”

14. DO WE MAKE UPDATES TO THIS NOTICE?

In Short: Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this Privacy Notice from time to time. The updated version will be indicated by an “Revised” date at the top of this Privacy Notice. If we make material changes to this Privacy Notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this Privacy Notice frequently to be informed of how we are protecting your information.

15. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may contact us by post at:

Terra Ops, Inc

3761 S Nova Road
Suite P #1048
Port Orange, FL 32129
United States of America

16. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country or state of residence in the US, you may have the right to request access to the personal information we collect from you, details about how we have processed it, correct inaccuracies, or delete your personal information. You may also have the right to withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by



applicable law. To request to review, update, or delete your personal information, please