

Privacy Policy

Effective: June 1, 2024

We at Lucid Data Hub Inc. (together with our affiliates, “Lucid Data Hub Inc.”, “we”, “our” or “us”) respect your privacy and are strongly committed to keeping secure any information we obtain from you or about you. This Privacy Policy describes our practices with respect to Personal Information we collect from or about you when you use our software, and services (collectively, “Services”).

1. Lucid Data Hub Software (In Customer-Hosted Environments)

The Lucid Data Hub Software (“The Software”) is designed to fully operate within the private confines of an authorized user(s) (“The Customers”) locally hosted IT and Cloud Infrastructure. Neither Lucid Data Hub Inc. or any of its affiliates shall collect or access any data processed through the Software. This deployment model allows the customers complete control over their data management and security. The software facilitates data-related tasks without the need of transmitting data outside the customer’s locally hosted environment, thereby adhering to expected internal and regulatory security standards. Security measures and data handling practices are managed by the customer, tailored to meet their specific requirements.

Any reference to a customer's IT and cloud infrastructure in the context of the Software hosted in customer environments, shall include all hardware, software, network resources, and services required for the operation, management, and storage of an organization's data as detailed in the provisions set out below:

1.1 Servers and Storage: Physical or virtual servers where data is processed and stored.

1.2 Networking: Components that facilitate data communication within the organization and externally.

1.3 Cloud Services: Public, private, or hybrid cloud environments where applications and data can be hosted, including platforms such as AWS, Azure, or Google Cloud (“Third

Party Platforms”). Lucid Data Hub Software can be hosted on public, private, or hybrid cloud environments, including platforms such as AWS, Azure, or Google Cloud. For data privacy and protection details specific to these cloud services, please refer to the privacy policies provided by each cloud provider. Note that Lucid Data Hub Inc. is not responsible for the data handling practices of these external platforms.

- i) Security Systems: Firewalls, intrusion detection systems, and other security measures to protect data integrity and privacy.
- ii) Data Management Tools: Software and tools used for data integration, management, and analysis.

The infrastructure is managed by the customer, ensuring that they maintain complete control over the security, compliance, and management of their data.

2. Personal Information We Collect

We may collect the following information from you provided you communicate with us through the use of any methods set out below (“Personal Information”)

2.1 Communication Information: If you communicate with us via email, telephone, chat or any other method of communication involving person to person interaction we may collect your name, contact information, and the contents of any messages you send (“Communication Information”). This provision does not apply to the Software hosted within local customer environments.

2.2 Other Information You Provide: We may collect other details you willingly volunteer to provide to us during the course of any events, surveys or questionnaires regarding the use of our Software or our public website: <https://LucidDataHub.Com> which may be used to establish your identity. (“Other Information You Provide”).

2.3 Personal Information We Receive Automatically From Your Use of Our Services: When you visit, use, or interact with the Services, we **do not** receive or collect information

about your visit, use, or interactions (“Technical Information”) such as Log Data, Usage Data, Device Data, or any other form of data including Cookies.

3. Personal Information We Do Not Collect

We **Do Not** collect any account information or user content from you when you create an account to use our services (“Personal Information”) as defined below.

- Account Information: When an account is created with us, we will not collect or store any personal details associated with your account such as your name or contact information.
- User Content: When you use our Services, we do not collect any Personal Information included in the input, file uploads, or feedback that you provide to our Services (“Content”).

4. How We Use Personal Information

We may use Personal Information obtained through communicating with you as defined in paragraph 2.1 above for the following purposes:

- To provide, administer, maintain and/or analyze the Services;
 - To improve our Services and conduct research;
 - To communicate with you; including to send you information about our Services and events;
 - To develop new programs and services;
 - To prevent fraud, criminal activity, or misuses of our Services, and to protect the security of our IT systems, architecture, and networks;
 - To carry out business transfers; and
 - To comply with legal obligations and legal process and to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or other third parties.
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- We do not “sell” Personal Information or “share” Personal Information for cross-contextual behavioral advertising (as those terms are defined under applicable

local laws). We also do not process sensitive Personal Information for the purposes of inferring characteristics about a consumer.

5. Disclosure of Personal Information

In certain circumstances we may provide your Personal Information that is collected from “Communications” as mentioned in paragraph 2 above, to third parties without further notice to you, unless required by the law:

- 5.1 Vendors and Service Providers: To assist us in meeting business operations needs and to perform certain services and functions, we may provide Personal Information to vendors and service providers, including providers of hosting services, customer service vendors, cloud services, email communication software, web analytics services, and other information technology providers, among others. Pursuant to our instructions, these parties will access, process, or store Personal Information only in the course of performing their duties to us.
- 5.2 Business Transfers: In the event of strategic transactions, reorganization, bankruptcy, receivership, or the transfer of service to another provider (referred to collectively as a "Transaction"), your Personal Information and additional data may be divulged during the due diligence phase to counterparties and other parties aiding in the Transaction. Furthermore, it may be transferred to a successor or affiliate as part of said Transaction, alongside other assets.
- 5.3 Legal Requirements: We may disclose your Personal Information, including details of your engagement with our Services, to government authorities, industry peers, or other third parties under the following circumstances: (i) when compelled by law or in the sincere belief that such action is necessary to fulfill a legal obligation, (ii) to safeguard and uphold our rights or property, (iii) if, in our sole discretion, we determine a violation of our terms, policies, or the law has occurred, (iv) to identify or prevent fraud or other unlawful activities, (v) to ensure the safety, security, and integrity of our products, employees, users, or the public, or (vi) to mitigate legal liability.

5.4 **Affiliates:** We may disclose Personal Information to our affiliates, meaning an entity that controls, is controlled by, or is under the common control of Lucid Data Hub Inc. Our affiliates may use the Personal Information we share in a manner consistent with this Privacy Policy.

6. Your Rights

Depending on your location, individuals may possess certain legal rights concerning their Personal Information that we collected from “Communications” with you as defined in paragraph 2 above. For instance, you might have the entitlement to:

- Access your Personal Information and details regarding its processing.
- Erase your Personal Information from our databases.
- Amend or update your Personal Information.
- Transfer your Personal Information to a third party (right to data portability).
- Limit how we handle your Personal Information.
- Revoke your consent—particularly if we depend on your consent as the legal basis for processing at any time.
- Protest against how we handle your Personal Information.
- File a complaint with your local data protection authority. You can exercise some of these rights through your Luciddatahub.com account. If you are unable to exercise your rights through your account, please submit your request to VenuAmancha@luciddatahub.com

7. Additional Disclosures and Your Rights

This section provides further details regarding the types of Personal Information we gather through “Communications” and how we may share or distribute this information. For further information about the Personal Information we collect, please refer to the section titled “Personal Information We Collect” as set out in Paragraph 2 above and for further details on “How We Use Personal Information”, please refer to paragraph 4 above.

Additionally, information on the retention of Personal Information can be found in paragraph 10 "Security and Retention" below.

To the extent provided for by local law and subject to applicable exceptions, individuals may have the following privacy rights in relation to their Personal Information:

7.1 Identifying Information, including Your Name, Organization & Contact Information

This information may be disseminated to our affiliates, vendors, and service providers for processing as directed by us; to law enforcement and other third parties for the legal purposes outlined above; to parties engaged in Transactions; to corporate administrators of enterprise or team accounts; and to other users and third parties at your discretion.

7.2 Commercial Data, such as Your Transaction History

We might reveal this data to our affiliates, vendors, and service providers for processing in accordance with our instructions; to law enforcement and other third parties for the legal reasons described above; to parties involved in Transactions; and to corporate administrators of enterprise or team accounts.

7.3 Geolocation Information

We may disclose this information to our affiliates, vendors, and service providers for processing in accordance with our instructions; to law enforcement and other third parties for the legal reasons described above; and to parties involved in Transactions.

- The right to know information about our processing of your Personal Information, including the specific pieces of Personal Information that we have collected from you;
- The right to request deletion of your Personal Information;
- The right to correct your Personal Information; and
- The right to be free from discrimination relating to the exercise of any of your privacy rights.

7.4 Exercising Your Rights

To the extent applicable under local law, you can exercise privacy rights described in this section by submitting a request through VenuAmancha@luciddatahub.com

7.5 Verification

To safeguard your Personal Information from unauthorized access, alteration, or deletion, we may need you to authenticate your credentials before allowing you to submit a request to access, rectify, or erase Personal Information. If you don't hold an account with us, or if we suspect fraudulent or malicious behavior, we may request further Personal Information and evidence of residency for verification purposes. If we are unable to verify your identity, we won't be able to fulfill your request.

7.6 Authorized Agents

You may also submit a rights request through an authorized agent. If you do so, the agent must present signed written permission to act on your behalf and you may also be required to independently verify your identity and submit proof of your residency with us. Authorized agent requests can be sent to: VenuAmancha@luciddatahub.com

7.7 Appeals

Depending on where you live, you may have the right to appeal a decision we make relating to requests to exercise your rights under applicable local law. To appeal a decision, please send your request to VenuAmancha@luciddatahub.com

8. Children

Our Service is not directed to minors under the age of 18. Lucid Data Hub Inc. does not knowingly collect Personal Information from minors under the age of 18. If you have reason to believe that a minor under the age of 18 has provided Personal Information to Lucid Data Hub Inc. please notify us immediately at VenuAmancha@luciddatahub.com.

We will investigate any notification and if appropriate, delete the Personal Information from our systems. If you are 13 or older, but under 18, you must have permission from your parent or guardian to use our Services.

9. Links to Other Websites

The Service may contain links to other platforms not operated or controlled by Lucid Data Hub Inc., as mentioned in paragraph 1.3 “Cloud Services” above. The information that you share with Third Party Platforms will be governed by the specific privacy policies and terms of service of the Third Party Platforms and not by this Privacy Policy. By providing these links we do not imply that we endorse or have reviewed these sites. Please contact the Third Party Sites directly for information on their privacy practices and policies.

10. Security and Retention

The Security and Retention provisions in this paragraph are only applicable to paragraph 3(i) of this document titled “Communication Information” as noted above. We employ commercially reasonable technical, administrative, and organizational measures to safeguard Personal Information both online and offline against loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, it's important to note that no Internet or email transmission can be entirely secure or error-free. Particularly, emails exchanged with us may not be secure. Thus, it's advisable to exercise caution when determining the information, you transmit to us via the communication or email. Additionally, we shall not be held responsible for any attempts to bypass privacy settings or security measures on the Service or third-party websites. Regarding the retention of your Personal Information, we will retain it 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 for which we retain Personal Information depends on various factors, including the volume, nature, and sensitivity of the information, the potential risks associated with unauthorized use or disclosure, our reasons for processing the information, and any legal requirement.

11. International Users

By using our Communication Information, you understand and acknowledge that your Personal Information will be processed and stored in our facilities and servers in Canada and may be disclosed to our Communication Information providers and affiliates in other jurisdictions.

11.1 Legal Basis for Processing

Our legal bases for processing your Personal Information include:

- Fulfillment of a contractual obligation with you when we provide and maintain our Services. When we process communication Information solely to provide our Services to you, this information is necessary to be able to provide our Services. If you do not provide this information, we may not be able to provide our Services to you.
- Your consent when we ask for your consent to process your Personal Information for the purpose of communication. Please note you have the right to withdraw your consent at any time.
- Compliance with our legal obligations when we use your Personal Information to comply with applicable law or when we protect our or our affiliates', users', or third parties' rights, safety, and property.

11.2 Data Transfers

Where required, we will use appropriate safeguards for transferring Personal Information outside of certain countries. We will only transfer Personal Information pursuant to a legally valid transfer mechanism.

11.3 Data Protection Officer

You can contact our data protection officer at info@nakkalaw.com for matters related to Personal Information processing.

12. **Changes to the Privacy Policy**

We may update this Privacy Policy from time to time. When we do, we will post an updated version on this page, unless another type of notice is required by applicable law.

13. **Contact Us**

Please contact VenuAmancha@luciddatahub.com if you have any questions or concerns not already addressed in this Privacy Policy.