Privacy Statement

Effective date: January 1, 2021

Thanks for entrusting Crossfold AI, LLC. ("AnnoLab", "we") with your source code, your projects, and your personal information. Holding on to your private information is a serious responsibility, and we want you to know how we're handling it.

All capitalized terms have their definition in AnnoLab's Terms of Service, unless otherwise noted here.

The short version

We use your personal information as this Privacy Statement describes. No matter where you are, where you live, or what your citizenship is, we provide the same high standard of privacy protection to all our users around the world, regardless of their country of origin or location.

Of course, the short version doesn't tell you everything, so please read on for more details.

What information AnnoLab collects

"User Personal Information" is any information about one of our Users which could, alone or together with other information, personally identify them or otherwise be reasonably linked or connected with them. Information such as a username and password, an email address, a real name, an Internet protocol (IP) address, and a photograph are examples of "User Personal Information."

User Personal Information does not include aggregated, non-personally identifying information that does not identify a User or cannot otherwise be reasonably linked or connected with them. We may use such aggregated, non-personally identifying information for research purposes and to operate, analyze, improve, and optimize our Website and Service.

Information users provide directly to AnnoLab

Registration information

We require some basic information at the time of account creation. When you create your own username and password, we ask you for a valid email address.

Payment information

If you create a paid Account with us we collect your full name, address, and credit card information or PayPal information. Please note, AnnoLab does not process or store your credit card information, but our third-party payment processor does.

Profile information

You may choose to give us more information for your Account profile, such as your full name, an avatar which may include a photograph, a GitHub account link, your company, and a URL to a third-party website. This information may include User Personal Information. Please note that your profile information may be visible to other Users of our Service, particularly if you contribute or create public projects.

Information AnnoLab automatically collects from your use of the Service

Transactional information

If you have a paid Account with us we automatically collect certain information about your transactions on the Service, such as the date, time, and amount charged.

Usage information

If you're accessing our Service or Website, we automatically collect the same basic information that most services collect, subject, where necessary, to your consent. This includes information about how you use the Service, such as the pages you view, the referring site, your IP address and session information, and the date and time of each request. This is information we collect from every visitor to the Website, whether they have an Account or not. This information may include User Personal information.

Cookies

As further described below, we automatically collect information from cookies (such as cookie ID and settings) to keep you logged in, to remember your preferences, to identify you and your device and to analyze your use of our service.

Device information

We may collect certain information about your device, such as its IP address, browser or client application information, language preference, operating system and application

version, device type and ID, and device model and manufacturer. This information may include User Personal information.

Information we collect from third parties

AnnoLab may collect User Personal Information from third parties. For example, this may happen if you sign up for training or to receive information about AnnoLab from one of our vendors, partners, or affiliates. AnnoLab does not purchase User Personal Information from third-party data brokers.

What information AnnoLab does not collect

We do not intentionally collect "Sensitive Personal Information", such as personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. If you choose to store any Sensitive Personal Information on our servers, you are responsible for complying with any regulatory controls regarding that data.

If you are a child under the age of 13, you may not have an Account on AnnoLab. AnnoLab does not knowingly collect information from or direct any of our content specifically to children under 13. If we learn or have reason to suspect that you are a User who is under the age of 13, we will have to close your Account. We don't want to discourage you from learning to code, but those are the rules. Please see our Terms of Service for information about Account termination. Different countries may have different minimum age limits, and if you are below the minimum age for providing consent for data collection in your country, you may not have an Account on AnnoLab.

We do not intentionally collect User Personal Information that is stored in your projects or other free-form content inputs. Any personal information within a user's project is the responsibility of the project owner.

How AnnoLab uses your information

- We may use your information for the following purposes:
- We use your Registration Information to create your account, and to provide you the Service.
- We use your Payment Information to provide you with the Paid Account service, or any other AnnoLab paid service you request.

- We use your User Personal Information, specifically your username, to identify you on AnnoLab.
- We use your Profile Information to fill out your Account profile and to share that profile with other users if you ask us to.
- We use your email address to communicate with you. Please see our section on email communication for more information on how or why we may do that.
- We use User Personal Information to respond to support requests.
- We use User Personal Information and other data to make recommendations for you, such as to suggest projects you may want to follow or contribute to. We learn from your behavior on AnnoLab—such as the projects you create and contribute to—in order to make machine learning models to speed your annotation process and improve your annotation quality . These recommendations are automated decisions, but they have no legal impact on your rights.
- We may use User Personal Information to invite you to take part in surveys, beta programs, or other research projects, subject, where necessary, to your consent .
- We use Usage Information and Device Information to better understand how our Users use AnnoLab and to improve our Website and Service.
- We may use your User Personal Information if it is necessary for security purposes or to investigate possible fraud or attempts to harm AnnoLab or our Users.
- We may use your User Personal Information to comply with our legal obligations, protect our intellectual property, and enforce our Terms of Service.
- We limit our use of your User Personal Information to the purposes listed in this Privacy Statement. If we need to use your User Personal Information for other purposes, we will ask your permission first. You can always see what information we have, how we're using it, and what permissions you have given us in your profile.

Our legal bases for processing information

To the extent that our processing of your User Personal Information is subject to certain international laws (including, but not limited to, the European Union's General Data Protection Regulation (GDPR)), AnnoLab is required to notify you about the legal basis on which we process User Personal Information. AnnoLab processes User Personal Information on the following legal bases:

- Contract Performance:
  - When you create an AnnoLab Account, you provide your Registration Information. We require this information for you to enter into the Terms of Service agreement with us, and we process that information on the basis

of performing that contract. We also process your username and email address on other legal bases, as described below.

- ○ If you have a paid Account with us, we collect and process additional Payment Information on the basis of performing that contract.
- Consent:
  - ○ We rely on your consent to use your User Personal Information under the following circumstances: when you fill out the information in your User Profile; when you decide to participate in an AnnoLab training, research project, beta program, or survey; and for marketing purposes, where applicable. All of this User Personal Information is entirely optional, and you have the ability to access, modify, and delete it at any time. You may withdraw your consent at any time.
- Legitimate Interests:
  - ○ Generally, the remainder of the processing of User Personal Information we perform is necessary for the purposes of our legitimate interest, for example, for legal compliance purposes, security purposes, or to maintain ongoing confidentiality, integrity, availability, and resilience of AnnoLab's systems, Website, and Service.
- If you would like to request deletion of data we process on the basis of consent or if you object to our processing of personal information, please contact us at info@annolab.ai

How we share the information we collect

We do not share your User Personal Information with third parties. Information on your User Profile may be accessible to anyone if you contribute or create public projects.

Project contents

Access to private projects

If your project is private, you control the access to your Content. If you include User Personal Information or Sensitive Personal Information, that information may only be accessible to AnnoLab in accordance with this Privacy Statement. AnnoLab personnel do not access private project content except for

- security purposes
- to assist the project owner with a support matter
- to maintain the integrity of the Service
- to comply with our legal obligations
- if we have reason to believe the contents are in violation of the law, or

- when you request or sign-up for auto-labeling recommendation services (your data may be used specifically in our Service to provide annotation prediction functionality or as a component in a training data quality analysis feature)
- with your consent.

However, while we do not generally search for content in your projects, we may scan our servers and content to detect certain tokens or security signatures, known active malware, known vulnerabilities in dependencies, or other content known to violate our Terms of Service, such as violent extremist or terrorist content or child exploitation imagery, based on algorithmic fingerprinting techniques (collectively, "automated scanning"). Our Terms of Service provides more details on private projects.

AnnoLab will provide notice regarding our access to private project content, unless for legal disclosure, to comply with our legal obligations, or where otherwise bound by requirements under law, for automated scanning, or if in response to a security threat or other risk to security.

Public Projects

If your project is public, anyone may view its contents. If you include User Personal Information, Sensitive Personal Information, or confidential information, such as email addresses or passwords, in your public project, that information may be indexed by search engines or used by third parties.

Other important information

Public information on AnnoLab

Many of AnnoLab services and features are public-facing. If your project content is public-facing, third parties may access and use it in compliance with our Terms of Service, such as by viewing your profile or projects or pulling data via our API. We do not sell that content; it is yours. However, we cannot fully control what others do with that information once it is in the public domain.

If you would like to compile AnnoLab data, you must comply with our Terms of Service regarding information usage and privacy, and you may only use any public-facing User Personal Information you gather for the purpose for which our user authorized it. For example, where a AnnoLab user has made an email address public-facing for the purpose of identification and attribution, do not use that email address for the purposes of sending unsolicited emails to users or selling User Personal Information, such as to recruiters, headhunters, and job boards, or for commercial advertising. We expect you

to reasonably secure any User Personal Information you have gathered from AnnoLab, and to respond promptly to complaints, removal requests, and "do not contact" requests from AnnoLab or AnnoLab users.

Organizations/Groups

You may indicate, through your actions on AnnoLab, that you are willing to share your User Personal Information. If you collaborate on or become a member of an Organization, then its Account owners may receive your User Personal Information. When you accept an invitation to an Organization, you will be notified of the types of information owners may be able to see (for more information, see About Organization Membership). If you accept an invitation to an Organization with a verified domain, then the owners of that Organization will be able to see your full email address(es) within that Organization's verified domain(s).

Please note, AnnoLab may share your username, Usage Information, and Device Information with the owner(s) of the Organization you are a member of, to the extent that your User Personal Information is provided only to investigate or respond to a security incident that affects or compromises the security of that particular Organization.

If you collaborate on or become a member of an organization that has agreed to a separate Terms of Service (e.g. Large Organization or Enterprise tier accounts) and a Data Protection Addendum (DPA) to this Privacy Statement, then that DPA governs in the event of any conflicts between this Privacy Statement and the DPA with respect to your activity in the Account.

Please contact the Account owners for more information about how they might process your User Personal Information in their Organization and the ways for you to access, update, alter, or delete the User Personal Information stored in the Account.

How you can access and control the information we collect

If you're already a AnnoLab user, you may access, update, alter, or delete your basic user profile information by editing your user profile or by contacting us at help@annolab.ai . You can control the information we collect about you by limiting what information is in your profile, by keeping your information current, or by contacting AnnoLab support at the email address above.

Data retention and deletion of data

Generally, AnnoLab retains User Personal Information for as long as your account is active or as needed to provide you services.

If you would like to cancel your account or delete your User Personal Information, you may do so in your user profile. We retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements, but barring legal requirements, we will delete your full profile (within reason) within 90 days of your request. You may contact also us at help@annolab.ai to request the erasure of the data we process on the basis of consent within 30 days.

After an account has been deleted, certain data, such as contributions to other Users' projects and comments in others' issues, will remain. However, we will delete or de-identify your User Personal Information, including your username and email address, from the author field of issues, pull requests, and comments by associating them with a ghost user if you file request for us to do so via help@annolab.ai .

Our use of cookies and tracking

Cookies

AnnoLab only uses strictly necessary cookies. Cookies are small text files that websites often store on computer hard drives or mobile devices of visitors.

We use cookies solely to provide, secure, and improve our service. For example, we use them to keep you logged in, remember your preferences, identify your device for security purposes, analyze your use of our service, compile statistical reports, and provide information for future development of AnnoLab. We use our own cookies for analytics purposes, but do not use any third-party analytics service providers.

By using our service, you agree that we can place these types of cookies on your computer or device. If you disable your browser or device's ability to accept these cookies, you will not be able to log in or use our service.

How AnnoLab secures your information

AnnoLab takes all measures reasonably necessary to protect User Personal Information from unauthorized access, alteration, or destruction; maintain data accuracy; and help ensure the appropriate use of User Personal Information.

AnnoLab enforces a written security information program. Our program:

- aligns with industry recognized frameworks;

- includes security safeguards reasonably designed to protect the confidentiality, integrity, availability, and resilience of our Users' data;
- is appropriate to the nature, size, and complexity of AnnoLab's business operations;
- includes incident response and data breach notification processes; and
- complies with applicable information security-related laws and regulations in the geographic regions where AnnoLab does business.

In the event of a data breach that affects your User Personal Information, we will act promptly to mitigate the impact of a breach and notify any affected Users without undue delay.

Transmission of data on AnnoLab is encrypted using SSH, and HTTPS (TLS). No method of transmission, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security.

How we may use your data in Machine Learning Models

AnnoLab may for the explicit purpose of providing a better service to you train machine learning models using your annotated data. For example, automated models may look at annotations you perform in a document in order to better recommend the type of your next highlight in the annotation menu popover. Or another example, machine learning models may be trained using your annotated data in a project in order to provide you with a prediction model that you may use to speed your annotation process for not-yet-annotated source files.

Your data will never be sold to a third party. Any models we train using your data will never be sold to a third party.

How we communicate with you

We use the email address you used to create your account to communicate with you. You may manage your communication preferences in your user profile.

AnnoLab may occasionally send notification emails about changes in a project you're watching, new features, requests for feedback, important policy changes, or to offer customer support. We also send marketing emails, based on your choices and in accordance with applicable laws and regulations. There's an "unsubscribe" link located at the bottom of each of the marketing emails we send you. Please note that you cannot opt out of receiving important communications from us, such as emails from our Support

team or system emails, but you can configure your notifications settings in your profile to opt out of other communications.

Our emails may contain a pixel tag, which is a small, clear image that can tell us whether or not you have opened an email and what your IP address is. We use this pixel tag to make our email more effective for you and to make sure we're not sending you unwanted email.

Resolving complaints

If you have concerns about the way AnnoLab is handling your User Personal Information, please let us know immediately. You may email us directly at help@annolab.ai with the subject line "Privacy Concerns." We will respond promptly — within 45 days at the latest.

Dispute resolution process

In the unlikely event that a dispute arises between you and AnnoLab regarding our handling of your User Personal Information, we will do our best to resolve it. Additionally, if you are a resident of an EU member state, you have the right to file a complaint with your local supervisory authority.

Changes to our Privacy Statement

Although most changes are likely to be minor, AnnoLab may change our Privacy Statement from time to time. We will provide notification to Users of material changes to this Privacy Statement through our Website at least 30 days prior to the change taking effect by posting a notice on our home page or sending email to the primary email address specified in your AnnoLab account. For other changes to this Privacy Statement, we encourage Users to watch or to check our site terms page frequently.

Contacting AnnoLab

Questions regarding AnnoLab's Privacy Statement or information practices should be directed to our support email help@annolab.ai .