Privacy Notice

InsightPlay AI Inc. • Effective Date: June 23, 2026 • Last Updated: June 23, 2026

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1. Introduction

This Privacy Notice (the "Notice") explains how **InsightPlay AI Inc.**, a corporation incorporated in the State of Delaware, United States of America ("InsightPlay," "we," "us," or "our"), collects, uses, shares, and protects personal information about visitors to our website at insightplay.ai (the "Site") and other prospects who interact with us in commercial contexts.

This Notice applies to personal information processed by InsightPlay as a controller in connection with our website, marketing activities, and commercial communications. It does not apply to personal data processed by InsightPlay on behalf of our customers in the course of delivering our Services — that processing is governed by our Data Processing Agreement (the "DPA") with the relevant customer.

By using the Site, you acknowledge that you have read this Notice. If you do not agree with our practices, please do not use the Site.

2. Information we collect

2.1. **Information you provide to us.** When you interact with us through the Site or in a commercial context, we may collect:

- Contact details you submit through forms — name, business email address, company, job title, country, and any free-text message you include in a contact / demo request.
- Information you provide when subscribing to updates or downloading materials — name, email address, and your stated interest.
- Records of correspondence — emails, messages, calls, and notes from commercial conversations between you and InsightPlay personnel.
- Other information you choose to share — for example when responding to a survey, attending an event we host, or applying for a role.

2.2. **Information collected automatically.** When you visit the Site, we and our service providers automatically collect:

- Device and connection information — IP address, browser type, operating system, device identifiers, language preferences, time zone.
- Usage information — pages viewed, links clicked, referring URL, date and time of visit, approximate location (country / region) inferred from IP address.
- Cookies and similar technologies — see Section 9 below.

2.3. We do not knowingly collect special categories of personal data (such as health, biometric, or political-opinion data) through the Site. Please do not submit such information to us.

3. How we use your information

We use the personal information described above for the following purposes:

- To respond to inquiries, demo requests, and other communications you initiate.
- To provide, operate, secure, and improve the Site and our commercial communications.
- To send you marketing communications about our products and services, where permitted by applicable law and subject to your right to opt out.
- To carry out due diligence on prospective customers, partners, and vendors.
- To detect, investigate, and prevent fraud, abuse, security incidents, and violations of our terms.

- To comply with our legal, regulatory, and audit obligations (including ISO/IEC 27001 and SOC 2 commitments).
- To establish, exercise, or defend legal claims.

4. Legal bases (for visitors in the EEA, the UK, and other jurisdictions requiring a legal basis)

We rely on the following legal bases under the EU General Data Protection Regulation (GDPR), the UK GDPR, and equivalent regimes:

- Consent — where you have given clear consent, for example for marketing emails or non-essential cookies. You may withdraw consent at any time.
- Performance of a contract — where processing is necessary to take steps at your request before entering into a contract, or to perform a contract with you.
- Legitimate interests — where processing is necessary for our legitimate interests (running and improving our business, security, fraud prevention, B2B prospecting), and your interests and rights do not override those interests.
- Legal obligation — where we must process the information to comply with a legal duty.

Where you are in Colombia, Argentina, Mexico, Panama, or another Latin American jurisdiction, we also rely on the legal bases recognised under the applicable local data-protection law (typically informed consent, contractual performance, legitimate interest of the controller, or legal obligation).

5. Sharing and disclosure

We share personal information only as described below. We do not sell personal information.

5.1. **Service providers.** We share personal information with vendors who process it on our behalf to deliver and operate the Site and our commercial activities. These include:

- Cloud hosting and infrastructure providers (for example Google Cloud Platform, Vercel).
- Website analytics providers.
- Customer-relationship management and email delivery providers.
- Customer support tooling providers.
- Security, monitoring, and fraud-prevention providers.

These vendors are contractually bound to process personal information only on our documented instructions and to apply appropriate security measures. A current list of categories of vendors is reflected in the “Sub-processors” section of our Trust Center.

5.2. **Legal requirements.** We may disclose personal information if we believe in good faith that disclosure is required to comply with applicable law, a legal process, or an enforceable governmental request, or to protect the rights, property, or safety of InsightPlay, our customers, or others.

5.3. **Business transfers.** If we are involved in a merger, acquisition, financing, reorganisation, bankruptcy, or sale of assets, your information may be transferred as part of that transaction. We will notify you (where required) before such a transfer becomes subject to a different privacy notice.

5.4. **With your consent.** We may share information with third parties when you direct us to do so or otherwise consent.

6. International transfers

InsightPlay is headquartered in the United States, and we and our service providers may process personal information in countries other than the one in which you are located, including the United States and other countries that may have data-protection laws different from those in your country.

Where personal information of individuals in the European Economic Area, the United Kingdom, or Switzerland is transferred to a country that does not provide an adequate level of data protection, we rely on appropriate safeguards under applicable law — typically the Standard Contractual Clauses

adopted by the European Commission (and the UK International Data Transfer Addendum where applicable).

Where personal information originating in Colombia, Argentina, Mexico, Panama, or other Latin American jurisdictions is transferred internationally, we comply with the cross-border-transfer requirements of the applicable local data-protection law, including obtaining any necessary authorisations.

7. Data retention

We retain personal information for as long as is necessary for the purpose for which it was collected, after which we delete or anonymise it. Indicative retention periods are:

- Contact / demo-request submissions: up to 24 months from the date of last commercial interaction, then deleted or anonymised.
- Marketing-list information: until you opt out, then deleted or anonymised within 30 days.
- Server and analytics logs: typically up to 13 months.
- Records required for legal, accounting, audit, or compliance purposes: as long as required by applicable law (typically 5–10 years).

Where we are required by law to retain personal information for longer, we will keep it secure and only access it for the purpose that required the retention.

8. Your rights

Depending on the jurisdiction in which you are located, you may have the following rights with respect to your personal information:

- Right of access — to obtain confirmation as to whether we process your personal information and to obtain a copy.
- Right to rectification — to have inaccurate personal information corrected or completed.
- Right to erasure (the “right to be forgotten”) — to have your personal information deleted in certain circumstances.
- Right to restriction of processing — to have processing limited in certain circumstances.
- Right to data portability — to receive your personal information in a structured, commonly used, machine-readable format, and to transmit it to another controller where technically feasible.
- Right to object — to object to processing based on legitimate interests, and to object to direct marketing at any time.
- Rights relating to automated decision-making — to obtain human intervention where automated decisions produce legal or similarly significant effects (note that we do not currently use such decisions in the context of this Site).
- Right to withdraw consent — where processing is based on consent, you may withdraw it at any time without affecting the lawfulness of processing before withdrawal.
- Right to lodge a complaint — with the data-protection authority in your country of residence, work, or where the alleged infringement occurred.

If you are a California resident, you have additional rights under the California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA), including the right to know what categories of personal information we have collected, the right to delete it, the right to correct it, the right to opt out of any sale or sharing for cross-context behavioural advertising (which we do not currently perform), and the right not to be discriminated against for exercising these rights.

If you are a resident of Colombia, Argentina, Mexico, Panama, or another Latin American jurisdiction, you have rights equivalent to those above under the applicable local data-protection law.

To exercise any of these rights, please contact us at **privacy@insightplay.ai** with the subject line “Privacy request — [the right you wish to exercise].” We will respond within the time required by applicable law (typically within 30 days, extendable by a further 60 days where the request is complex).

9. Cookies and similar technologies

We and our service providers use cookies, web beacons, pixels, and similar technologies on the Site. Cookies are small text files that are placed on your device when you visit a website.

9.1. **Types of cookies we use.**

- Strictly necessary cookies — required for the Site to function (for example, to remember your cookie preferences). These cannot be disabled.
- Analytics cookies — help us understand how visitors use the Site so we can improve it.
- Functional cookies — remember your preferences and choices (for example, language).
- Marketing cookies — where used, help measure the effectiveness of our marketing campaigns. We set these only where you have consented (in jurisdictions where consent is required).

9.2. **Managing cookies.** Most browsers allow you to refuse or accept cookies. If you reject cookies, some Site features may not function as intended. Where required by applicable law, we provide a cookie banner the first time you visit the Site, allowing you to consent to or reject non-essential cookies.

10. Children's privacy

The Site is not directed at children under the age of sixteen (16), and we do not knowingly collect personal information from anyone in that age range. If we become aware that we have collected personal information from a child without verified parental consent, we will take steps to delete it. If you believe a child has provided us with personal information, please contact us at the address below.

11. Security

We maintain technical and organisational security measures designed to protect personal information against unauthorised access, accidental loss, alteration, or disclosure. These measures are described at a high level in our Data Processing Agreement (Annex 2). No method of transmission over the internet or method of electronic storage is one hundred percent secure, however, and we cannot guarantee absolute security.

12. Third-party links

The Site may contain links to third-party websites that we do not control. We are not responsible for the privacy practices of those websites. We encourage you to read the privacy notices of any third-party sites you visit.

13. Changes to this Notice

We may update this Notice from time to time to reflect changes in our practices, technology, legal requirements, or other factors. When we make material changes, we will update the “Last Updated” date at the top and, where required by law, provide additional notice (for example by email or a prominent notice on the Site). We encourage you to review this Notice periodically.

14. Contact us

For any questions, comments, or requests about this Notice or our processing of your personal information, please contact:

InsightPlay AI Inc.

Email: privacy@insightplay.ai (subject line: “Privacy”)

Website: https://insightplay.ai

If you are an EEA, UK, or Swiss resident and we cannot resolve your request, you have the right to lodge a complaint with the data-protection authority in your country of residence, work, or where the

alleged infringement occurred. If you are a California resident, you may also contact the California Attorney General. If you are in another Latin American jurisdiction (Colombia, Argentina, Mexico, Panama), you may contact your local data-protection authority.

This Privacy Notice is provided as part of InsightPlay AI Inc.'s Trust Center. It governs the processing of personal information about website visitors and prospects. Processing of personal data about our customers' end users is governed by the Data Processing Agreement between InsightPlay and the relevant customer.