

Privacy Notice

Last updated: March 2025

We at Real Dev Inc. (“**us**”, “**we**”, or “**our**”) recognize and respect the importance of maintaining the privacy of our customers. This Privacy Notice describes the types of information we collect from you when you visit our platform (“**Platform**”) and/or use our services thereon (“**Services**”). This Privacy Notice also explains how we process, transfer, store and disclose the information collected, as well as your ability to control certain uses of the collected information. If not otherwise defined herein, capitalized terms have the meaning given to them in the Terms of Service, available at www.real.dev/legal/tos (<https://www.real.dev/legal/tos>) (“**Terms**”). “**You**” means an individual using the Services.

“**Personal Data**” means any information that refers, is related to, or is associated with an identified or identifiable individual or as otherwise may be defined by applicable law. This Privacy Notice details which Personal Data we collect when we provide the Services to you.

1. Personal Data We Collect

1.1. In order to use our Services, the Customer or Administrator, as applicable, will be required to register an account for you and provide us with Personal Data about you such as your name, email address and phone number. In order to use your account, you will be required to provide us with Personal Data, such as your password.

1.2. We also collect any materials, including images and/or pictures and/or photos and/or documents, and/or Documentation, and/or input that you may upload to the Platform or otherwise provide through the Chatbot, and any Personal Data contained therein. Additionally, we may collect any outputs generated by our Chatbot and/or other Services, as well as information regarding your use of such Services, including any Personal Data that may be contained therein.



1.3. In addition, when you use the Platform, we may gather certain information automatically about your computer or mobile device, such as your operating system, your IP address, device ID, as well as your browsing history and any other information regarding your use and viewing on our Platform.

1.4. You are under no legal obligation to provide us with any such Personal Data. It is your voluntary decision whether to provide us with any Personal Data, but if you refuse to provide such information, we may not be able to register you to the Platform and/or provide you with certain Services.

2. How We Use Your Personal Data.

2.1. General. We and any of our trusted third-party subcontractors and service providers use the Personal Data we collect from and about you for any of the following purposes: (1) to provide you with the Services; (2) to respond to your inquiries or requests, contact and communicate with you; (3) to develop new products or services and conduct analyses to improve our current content, products, and Services and to train our AI models; (4) to contact you with informational phone calls, newsletters and promotional materials relating to our Platform and Services; (5) to review the usage and operations of our Platform and Services; (6) to use your data in an aggregated, non-specific format for analytical purposes (as detailed below); (7) to prevent fraud, protect the security of our Platform and Services, and address any problems with the Platform and/or Services; (8) to provide customer support; and (9) to monitor data for harmful content and/or wrongdoing using automated detection mechanisms.

2.2. Statistical Information and Analytics. We and/or our service providers use analytics tools, including Google Analytics, to collect and analyze information about the use of the Services, such as how often users visit the Platform, what pages they visit when they do so, and what other sites and mobile applications they used prior to visiting the Platform. By analyzing the information we receive, we may compile statistical information across a variety of platforms and users. This helps us improve our Services by allowing us to identify new trends and customer needs, which in turn allows us to consider new products and services or tailor existing products and services accordingly. We may share such information with our partners, without restriction, on commercial terms that we can determine in our sole discretion. You can find more information about how Google collects information and how you can control such use at <https://policies.google.com/technologies/partner-sites>. (<https://policies.google.com/technologies/partner-sites>)

3. Sharing the Personal Data We Collect.

We share your information, including Personal Data, as follows:



3.1. Affiliates. We share information, including your Personal Data, with our affiliated companies, Real Dev Ltd., where this is necessary to provide you with our products and Services, and for business management purposes.

3.2. Service Providers and Subcontractors. We disclose information, including Personal Data we collect from and/or about you, to our trusted service providers and subcontractors, who use such information to: (1) help us provide you with the Services; (2) aid in our and their understanding of how users are using our Services; (3) for the purpose of direct marketing (see above for more details); and (4) monitor any data for wrongdoing and/or harmful content. Such service providers and subcontractors provide us with IT and system administration services, data backup, security, and storage services, data analysis. In addition, we use certain third-party artificial intelligence (AI) services, in order to provide you with the Services. These third party services may use content including your Personal Data to monitor data for any wrongdoing and/or harmful content and for improvement of their services and AI models in accordance with the relevant third party's policies.

3.3. International Transfers. By accepting this Privacy Notice, you acknowledge and agree that we may use subcontractors and service providers who are located in countries other than your own and may send them information we receive (including Personal Data).

3.4. Business Transfers. Your Personal Data may be disclosed as part of, or during negotiations of, any merger, sale of company assets or acquisition (including in cases of liquidation). In such case, your Personal Data shall continue to be subject to the provisions of this Privacy Notice.

3.5. Law Enforcement Related Disclosure. We may share your Personal Data with third parties: (i) if we believe in good faith that disclosure is appropriate to protect our or a third party's rights, property or safety (including the enforcement of the Terms and this Privacy Notice); (ii) as is necessary to comply with any legal and/or regulatory obligation; or (iii) when required by subpoena, court order or the order of another governmental or law enforcement authority.

3.6. Legal Uses. We may use your Personal Data as required or permitted by any applicable law, for example, to comply with audit and other legal requirements.

3.7. Other Uses or Transfer of Your Personal Data. If you use our Platform and/or Services with or through a third-party service, site and/or mobile application, we may receive information (including Personal Data) about you from those third parties, including from the Customer. Please note that when you use third parties outside

of our Platform and/or Services, their own terms and privacy policies will govern your use of those services



4. Security.

We make efforts to follow generally accepted industry standards to protect the Personal Data submitted to and collected by us, both during transmission and once we receive it. However, no method of transmission over the Internet or method of electronic storage is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security. As the security of information depends in part on the security of the computer you use to communicate with us and the security you use to protect user IDs and passwords, please take appropriate measures to protect this information.

5. Data Retention

5.1. Subject to applicable law and our (regulatory) obligations, we retain Personal Data as necessary for the purposes set forth above. We may delete information from our systems without notice to you once we deem it is no longer necessary for these purposes.

5.2. In some circumstances, we may store your Personal Data for longer periods of time, for instance where we are required to do so in accordance with legal, regulatory, tax, audit, accounting requirements and so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your Personal Data or dealings

6. Cookies and Similar Technologies.

We use cookies and similar technologies for a number of reasons, including to help personalize your experience. Third parties through which we provide the Services and/or our business partners may be placing and reading cookies on your browser or using web beacons to collect information. When visiting this Platform, you shall be notified of the use and placement of cookies and other similar technologies on your device as specified herein.

6.1. What are Cookies? A cookie is a small piece of text that is sent to a user's browser or device. The browser provides this piece of text to the device of the originating user when this user returns.

6.1.1. A "session cookie" is temporary and will remain on your device until you leave the Platform

6.1.2. A "persistent" cookie may be used to help save your settings and customizations across visits. It will remain on your device until you delete it.



6.1.3. First-party cookies are placed by us, while third-party cookies may be placed by a third party. We use both first- and third-party cookies.

6.1.4. We may use the terms “cookies” to refer to all technologies that we may use to store data in your browser or device or that collect information or help us identify you in the manner described above, such as web beacons or “pixel tags”.

6.2. How We Use Cookies. We use cookies and similar technologies for a number of reasons, as specified below. The specific names and types of the cookies, web beacons, and other similar technologies we use may change from time to time. However, the cookies we use generally fall into one of the following categories:

Type of Cookie	Why We Use These Cookies
Necessary	These cookies are necessary in order to allow the Platform to work correctly. They enable you to access the Platform, move around, and access different services, features, and tools. Examples include remembering previous actions (e.g. entered text) when navigating back to a page in the same session. These cookies cannot be disabled.
Functionality	These cookies remember your settings and preferences and the choices you make (such as language or regional preferences) in order to help us personalize your experience and offer you enhanced functionality and content.
Security	These cookies can help us identify and prevent security risks. They may be used to store your session information to prevent others from changing your password without your login information.
Performance/Analytics	These cookies can help us collect information to help us understand how you use our Platform, for example whether you have viewed messages or specific pages and how long you spent on each page. This helps us improve the performance of our Platform.

6.3. How to Adjust Your Preferences. Most Web browsers are initially configured to accept cookies, but you can change this setting so your browser either refuses all cookies or informs you when a cookie is being sent. In addition, you are free to delete any existing cookies at any time. Please note that some features of the Services may not function properly when cookies are disabled or removed. For example, if you

delete cookies that store your account information or preferences, you will be required to input these each time you visit.



7. Third-Party Applications and Services.

All use of third-party applications or services is at your own risk and subject to such third party's terms and privacy policies.

8. Communications.

We reserve the right to send you service-related communications, including service announcements and administrative messages, without offering you the opportunity to opt out of receiving them. Should you not wish to receive such communications, you may ask Customer or Administrator, as applicable, to cancel your account.

9. Children.

We do not knowingly collect Personal Data from children under the age of thirteen (13). In the event that you become aware that an individual under the age of thirteen (13) has enrolled without parental permission, please advise us immediately.

10. Changes to the Privacy Notice.

We may update this Privacy Notice from time to time to keep it up to date with legal requirements and the way we operate our business, and we will place any updates on this webpage. Please come back to this page every now and then to make sure you are familiar with the latest version. If we make material changes to this Privacy Notice, we will seek to inform you by notice on this page or via email.

11. Comments and Questions.

If you have any comments or questions about this Privacy Notice or if you wish to exercise any of your legal rights as set out herein, please contact us at privacy@real.dev. (<mailto:privacy@real.dev>)





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