



Privacy Policy

Quonai BV is a data-architecture and regulatory infrastructure company working to make AI deployable in regulated environments.

This Privacy Policy explains how we collect, use, disclose, and process your personal data when you use our website, the Quonai platform, or other Quonai BV products and services (the “Services”). This Privacy Policy does not apply to content that we process on behalf of customers of our business offerings, such as our Enterprise accounts. Our use of that data is governed by our customer agreements covering access to and use of those offerings.

This Privacy Policy also describes your privacy rights. More information about your rights, and how to exercise them, is set out in Section 4 (“Rights and Choices”).

If you are located in Canada, Brazil, or the Republic of Korea, please read the relevant Regional Supplemental Disclosure (Section 11) which applies to you.

1. Collection of Personal Data

Personal data you provide to us directly

- **Identity and Contact Data:** Quonai BV collects identifiers, including your name, email address, and phone number when you sign up for a Quonai BV account, or to receive information on our Services. We may also collect or generate indirect identifiers (e.g., “USER12345”).
- **Payment Information:** We shall collect your payment information if you choose to purchase access to Quonai BV’s Services.
- **Inputs and Outputs:** You are able to interact with our Services in a variety of formats, including but not limited to chat, coding, agentic sessions (where Quonai AI performs multi-step tasks or takes actions on your behalf), and connected services. The content you submit to the Services through these interactions, including via third-party applications, services, and content you choose to upload, integrate or interact with using our Services, are your “Inputs”. Inputs generate responses and actions (“Outputs”). If you include personal data or reference external content in your Inputs, we will collect that information and it may be reproduced in your Outputs.
- **Feedback on your use of our Services:** We appreciate feedback, including ideas and suggestions for improvement or rating an Output in response to an Input (“Feedback”). If you rate an Output in response to an Input, we may store the entire related conversation as part of your Feedback.
- **Study Participation Data:** If you participate in Quonai BV research studies, surveys, or interviews, we collect the responses you provide, associated account data, and related Technical Information.
- **Communication Information:** If you communicate with us, we collect your name, contact information, and the contents of any messages you send.
- **Verification Data:** In certain circumstances, we may ask you to verify your age or identity. Data collected may include an image of your government-issued identity document, your image in photo or video form, and the result of the verification.

When you provide Inputs—including by uploading files, granting access to third-party services, or instructing Quonai AI to retrieve or act on information—you are responsible for ensuring you have the necessary rights, permissions, or authority to do so.

Personal data we receive automatically from your use of the Services

When you use the Services, we also receive certain technical data automatically (collectively “Technical Information”). This includes:

- **Device and Connection Information:** Your device or browser automatically sends us information about when and how you install, access, or use our Services. This includes device type, operating system, browser information, IP address, and device identifiers.
- **Usage Information:** We collect information about your use of the Services, such as dates and times of access, browsing history, search, pages you view, and other information about how you use the Services.
- **Log and Troubleshooting Information:** We collect information about how our Services are performing when you use them, including log files and error reports.
- **Cookies & Similar Technologies:** We and our service providers use cookies, scripts, or similar technologies to manage the Services and to collect information about you and your use of the Services.

Personal data we collect or receive to train our models

Quonai BV may obtain personal data from third party sources in order to train and improve our models. Specifically, we may use data from the following sources:

- Publicly available information via the Internet
- Datasets obtained through commercial agreements with third party businesses
- Data that our users or crowd workers provide, including Inputs and Outputs from our Services (unless users opt out)
- Feedback that users explicitly provide about our Services
- Materials flagged for safety, security, or policy review
- Data that we generate internally

2. Uses of Personal Data Permitted Under Applicable Data Protection Laws

We use your personal data for the following purposes:

- To provide, maintain and facilitate any products and services offered to you with respect to your Quonai BV account;
- To provide, maintain and facilitate optional services and features that enhance platform functionality and user experience;
- To provide you with service updates, communications, and to provide tailored recommendations about our Services;
- To create and administer your Quonai BV account;
- To facilitate payments for products and services provided by Quonai BV;
- To prevent and investigate fraud, abuse, and violations of our Usage Policy, unlawful or criminal activity, unauthorized access to or use of personal data or Quonai BV systems and networks;
- To investigate and resolve disputes;
- To investigate and resolve security issues;
- To debug and to identify and repair errors that impair existing functionality;
- To improve the Services and conduct research, including training our models; and
- To enforce our Terms of Service and similar terms and agreements, including our Usage Policy.

We may use your Inputs and Outputs to train and improve Quonai BV AI models, unless you opt out through your account settings.

3. Recipients and Third-Party Data Sources

Quonai BV will disclose personal data to, or receive personal data from, the following categories of third parties:

- **Affiliates & corporate partners:** Quonai BV discloses the categories of personal data described above between and among its affiliates and related entities.
- **Service providers & business partners:** Quonai BV may receive and disclose the categories of personal data described above with service providers and business partners for a variety of business purposes, including website and data hosting, ensuring compliance with industry standards, research, auditing, data processing, and investigating security and fraud issues.
- **Your Organization and Administrator:** If you use an email address owned by your employer or another organization, your account may be linked to the organization's enterprise account with us.
- **As part of a significant corporate event:** If Quonai BV is involved in a merger, corporate transaction, bankruptcy, or other situation involving the transfer of business assets, we may disclose your personal data as part of these corporate transactions.
- **Third-Party Websites, Integrations, and Services:** Our Services allow you to connect to and interact with third-party applications, services, and content. Quonai BV is not responsible for the data practices of Third-Party Services; you should review the third party's privacy policy before enabling integrations.
- **Pursuant to regulatory or legal requirements:** We may share personal data with government authorities, law enforcement, or other third parties where, based on the information available to us, we have a good-faith belief that disclosure is reasonably necessary to comply with applicable law or to prevent serious harm.
- **Research publications:** We may publish aggregated, de-identified, or anonymized findings from our research.
- **With an individual's consent:** Quonai BV will otherwise disclose personal data when an individual gives us permission or directs us to disclose this information.

4. Rights and Choices

Depending on where you live and the laws that apply in your country of residence, you may enjoy certain rights regarding your personal data. We strive to prioritize the protection of personal data and comply with all applicable privacy laws.

To exercise your rights, you or an authorized agent may submit a request by contacting us at privacy@quonai.com. We will respond within the period required by the data protection law that applies to you.

Summary of your rights (subject to applicable law):

- **Right to know:** the right to know what personal data Quonai BV processes about you, including the categories of personal data, the categories of sources from which it is collected, the business or commercial purposes for collection, and the categories of third parties to whom we disclose it.
- **Access & data portability:** the right to request a copy of the personal data Quonai BV processes about you, subject to certain exceptions and conditions.
- **Deletion:** the right to request that we delete personal data collected from you when you use our Services, subject to certain exceptions.
- **Correction:** the right to request that we correct inaccurate personal data Quonai BV retains about you, subject to certain exceptions.
- **Objection:** the right to object to processing of your personal data, including profiling conducted on grounds of public or legitimate interest.
- **Restriction:** the right to restrict our processing of your personal data in certain circumstances.

- Withdrawal of consent: Where Quonai BV's processing of your personal data is based on consent, you have the right to withdraw your consent.
- Automated decision-making: Quonai BV does not engage in decision making based solely on automated processing in a manner which produces a legal effect or significantly affects you.
- Sale & targeted advertising: Quonai BV does not "sell" your personal data as that term is defined by applicable laws and regulations.

5. Data Transfers

Quonai BV is a company operating globally, and when you access our Services, your personal data may be transferred to servers in the Netherlands or other countries for the purposes outlined in Section 2 of this Privacy Policy. This may be a direct provision of your personal data to us, or a transfer that we or a third party make.

Where Quonai BV transfers information outside the EEA or the UK, we ensure it benefits from an adequate level of data protection by relying on:

- Adequacy decisions: decisions from the European Commission under Article 45 GDPR where they recognize that a country outside of the EEA offers an adequate level of data protection; or
- Standard contractual clauses: contractual clauses approved under Article 46 GDPR that allow companies in the EEA to transfer data outside the EEA.

6. Data Retention, Data Lifecycle, and Security Controls

Quonai BV retains your personal data for as long as reasonably necessary for the purposes and criteria outlined in this Privacy Policy.

When the personal data collected is no longer required by us, we and our service providers will perform the necessary procedures for destroying, deleting, erasing, or converting it into an anonymous form as permitted or required under applicable laws.

Aggregated or De-Identified Information

We apply aggregation and de-identification techniques where appropriate as part of our data minimization practices. For example, we may process personal data in an aggregated or de-identified form to analyze and improve the effectiveness of our Services, conduct analytics, study user behavior, and train our AI models.

Security Controls Relating to our Processing of Personal Data

We implement appropriate technical and organizational security measures designed to protect personal data from loss, misuse, and unauthorized access, disclosure, alteration, or destruction.

7. Children

Our Services are not directed towards, and we do not knowingly collect, use, disclose, sell, or share any information from children under the age of 18. We have measures in place to detect and remove children from our Services. If you become aware that a child under the age of 18 has provided any personal data to us while using our Services, please email us at privacy@quonai.com.

8. Changes to Our Privacy Policy

Quonai BV may update this Privacy Policy from time to time. We will notify you of any material changes to this Privacy Policy, as appropriate, and update the Effective Date at the top of this document. You can view a summary of privacy policy changes by contacting us.

9. Contact Information

If you have any questions about this Privacy Policy, or have any questions, complaints or requests regarding your personal data, you can contact us as described below:

- Quonai BV, registered in the Netherlands.
- Email: privacy@quonai.com
- Data Protection Officer: dpo@quonai.com

Please note that under many countries' laws, you have the right to lodge a complaint with the supervisory authority in the place in which you live or work. In the Netherlands, this is the Autoriteit Persoonsgegevens (AP). A full list of EU supervisory authorities' contact details is available at edpb.europa.eu.

10. Legal Bases for Processing

Purpose	Type of Data	Legal Basis
To provide, maintain and facilitate products and services offered with respect to your Quonai BV account	Identity and Contact Data; Payment Information; Feedback; Inputs and Outputs; Technical Information	Contract
To provide, maintain and facilitate optional services and features that enhance platform functionality and user experience	Identity and Contact Data; Feedback; Study Participation Data; Inputs and Outputs; Technical Information	Consent; Legitimate Interests
To provide service updates, communications, and tailored recommendations about our Services	Identity and Contact Data; Communication Information; Technical Information; Study Participation Data	Contract; Consent; Legitimate Interests
To create and administer your Quonai BV account	Identity and Contact Data; Payment Information; Feedback; Verification Data	Contract
To facilitate payments for products and services provided by Quonai BV	Identity and Contact Data; Payment Information	Contract
To prevent and investigate fraud, abuse, and violations of our Usage Policy	Identity and Contact Data; Payment Information; Inputs and Outputs; Technical Information; Verification Data	Consent; Legitimate Interests; Legal Obligation; Vital Interests
To investigate and resolve disputes	Identity and Contact Data; Payment Information; Inputs and Outputs; Feedback;	Legitimate Interests; Legal Obligation

	Technical Information; Communication Information	
To investigate and resolve security issues	Identity and Contact Data; Feedback; Technical Information; Inputs and Outputs; Verification Data	Legal Obligation; Legitimate Interests
To debug and to identify and repair errors that impair existing functionality	Identity and Contact Data; Feedback; Technical Information; Inputs and Outputs	Legitimate Interests
To improve the Services and conduct research, including model training	Feedback; Study Participation Data; Inputs and Outputs; Technical Information	Scientific Research; Consent; Legitimate Interests
To enforce our Terms of Service and similar terms and agreements, including our Usage Policy	Identity and Contact Data; Inputs and Outputs; Technical Information; Study Participation Data; Verification Data	Contract; Legitimate Interests

11. Regional Supplemental Disclosures

Supplemental Disclosures for Residents of Canada

These supplemental disclosures contain additional information relevant to residents of Canada. This content should be read in conjunction with the rest of our Privacy Policy. In case of conflict between our Privacy Policy and these supplemental disclosures, the supplemental disclosures shall prevail in relation to residents of Canada.

Consent. By expressly consenting to this Privacy Policy, you confirm you have read, understand, and consent to the collection, use, processing, and disclosure of your personal data in accordance with this Privacy Policy. We will only collect, use and disclose your personal data with your consent, unless otherwise permitted or required by law.

Cross-jurisdictional Transfers. By providing us with personal data, you acknowledge and agree that your personal data may be transferred or disclosed to other jurisdictions for processing and storage outside of Canada, including to the Netherlands and countries listed in our Subprocessor List, where laws regarding the protection of personal data may be less stringent than the laws in your jurisdiction.

Contact. If you have any questions or comments about our processing of your personal data, or to exercise your rights as outlined in Section 4, please contact us at privacy@quonai.com.

Supplemental Disclosures for Residents of Brazil

These supplemental disclosures contain additional information relevant to residents of Brazil. This content should be read in conjunction with the rest of our Privacy Policy.

Legal Bases. Depending on the specific purpose of the processing, we may rely on different grounds where permitted by and in accordance with the Brazilian General Data Protection Law (LGPD).

Data Subject's Rights. LGPD grants certain rights regarding your personal data:

- Confirmation of whether your data is being processed.
- Access to your data.
- Correction of incomplete, inaccurate or outdated data.
- Anonymization, blocking or erasure of data.
- Portability of personal data to a third party.

- Information of public and private entities with which we shared data.
- Information about the possibility to refuse to provide consent and the respective consequences.
- Withdrawal of your consent.
- Request a review of decisions made solely based on automated processing of personal data.

International Data Transfers. Any information we hold about you will be transferred to, used, processed, and stored in the Netherlands and other countries. For international transfers from Brazil, we will rely on standard contractual clauses (SCCs) approved by the Brazilian Data Protection Authority (ANPD).

Supplemental Disclosures for Residents of the Republic of Korea

The domestic representative of Quonai BV for data protection and related regulatory purposes in the Republic of Korea is:

- Entity Name and Representative: Quonai BV (Korean Representative — to be designated)
- Registered Address: Quonai BV, Netherlands
- Email: legal@quonai.com

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