Privacy Policy

Effective Date: October 14, 2025

This Privacy Policy ("Policy") describes how Renoverse AI, Corp. ("Renoverse," "we," "us," or "our") collects, uses, shares, and protects personal information in connection with our website, platform, mobile applications, and related hosted services (collectively, the "Services"). By accessing or using the Services, you agree to this Policy. If you do not agree, you must not use the Services.

1. Definitions

For purposes of this Policy:

- "PII" or "Personal Information" means information that can reasonably identify an individual, including name, email address, phone number, physical address, account credentials, payment information, and similar identifiers.
- "Services" means the Renoverse Al, Corp. website, platform, mobile applications, Al systems, and related hosted services.
- "User Content" means project data, design plans, finish schedules, images, or other materials that users upload, submit, or make available through the Services.
- "Aggregated Data" means de-identified or anonymized information collected through the Services that cannot reasonably identify an individual.
- "Sensitive Personal Information" means categories of data that receive heightened protection under applicable law, including government-issued identifiers, financial account details, precise geolocation, racial or ethnic origin, health information, and biometric data.
- "Processing" means any operation performed on Personal Information, such as collection, storage, use, disclosure, transfer, or deletion.

2. Information We Collect

We may collect the following categories of information:

Information You Provide

- Account information such as name, email address, phone number, billing address, and login credentials.
- Payment information processed through third-party providers (e.g., Stripe). Renoverse
 does not store full payment card details.

- User Content, including design plans, finish schedules, project files, and other data you upload.
- Communications with us, including support requests, survey responses, and other correspondence.

Information We Collect Automatically

- Device and usage information such as IP address, browser type, operating system, device identifiers, and access times.
- Activity data relating to your interactions with the Services, including pages viewed, features used, and session data.
- Cookies and similar tracking technologies (see Section 8, "Cookies and Tracking Technologies").

Information from Third Parties

- Information from service providers, partners, or integrations (e.g., authentication services, analytics providers).
- Publicly available information related to contractors, architects, and other professionals to improve our services.

3. How We Use Information

We use the information we collect for the following purposes:

- To provide, maintain, and improve the Services.
- To process transactions, manage billing, and provide customer support.
- To personalize the Services, including content, recommendations, and features.
- To conduct research, analytics, and product development.
- To send updates, technical notices, and administrative communications.
- To comply with legal obligations and enforce our Terms of Service.
- To detect, prevent, and address fraud, security, and technical issues.
- To use aggregated, de-identified, or anonymized data for analytics, benchmarking, marketing, and other commercial purposes, provided that such information does not identify individual users.

4. How We Share Information

We may share information in the following circumstances:

- Service Providers: With trusted vendors, contractors, and partners who perform services
 on our behalf (e.g., payment processing, hosting, analytics).
- **Business Partners:** With architects, contractors, or design professionals as required to provide the Services.
- **Legal and Compliance:** When required by law, subpoena, court order, or legal process, or to protect our legal rights, users, or others.
- **Business Transfers:** In connection with a merger, acquisition, sale of assets, or financing.
- **Aggregated Data:** We may share anonymized or aggregated data that does not reasonably identify you with third parties for research, analytics, marketing, or other lawful business and commercial purposes, including for advertising or data-licensing arrangements, provided that no individual is personally identifiable.

5. Data Retention

We retain Personal Information only as long as necessary to fulfill the purposes described in this Policy, comply with our legal obligations, resolve disputes, and enforce agreements. Specific retention periods may vary based on the type of data and the context in which it was collected. Factors we consider in determining appropriate retention periods include:

- The nature and sensitivity of the Personal Information.
- The potential risk of harm from unauthorized use or disclosure.
- The purposes for which the information was collected and whether those purposes can be achieved through other means.
- Our legal, regulatory, tax, accounting, and reporting obligations.

Data Minimization

We apply the principle of data minimization by collecting, processing, and retaining only the Personal Information that is relevant, adequate, and reasonably necessary for the purposes described in this Policy. We will not use Personal Information in a manner that is incompatible with those purposes.

General Retention Practices

- **Account Information:** Retained for the duration of your account and a reasonable period thereafter to comply with legal obligations and resolve disputes.
- **User Content:** Retained as long as your account is active unless you delete it or request deletion.

- **Payment Information:** Retained only as long as necessary to process transactions and comply with applicable financial regulations.
- **Communications:** Retained as needed for customer support, legal obligations, or business operations.

We may anonymize or aggregate Personal Information for research or statistical purposes, in which case such data may be retained indefinitely without further notice to you.

6. Data Security

Renoverse uses appropriate technical and organizational measures to protect Personal Information against unauthorized access, loss, misuse, alteration, or disclosure. These measures include but are not limited to:

- **Encryption:** Personal Information is encrypted during transmission and, where applicable, at rest.
- Access Controls: Access to Personal Information is restricted to authorized personnel with a legitimate business need.
- Monitoring: Systems are monitored for potential vulnerabilities and security incidents.
- **Testing:** Security controls are periodically reviewed, tested, and updated.
- **Incident Response:** Procedures are in place to detect, investigate, and respond to data breaches or security incidents in accordance with applicable laws.

Data Breach Notification

If we become aware of a data breach that affects your Personal Information, we will notify you and the appropriate authorities as required by applicable law. Notifications may be delivered by email, through the Services, or by other legally permitted methods. The notice will include information about the nature of the breach, the information affected, steps we are taking to address it, and guidance on how you can protect yourself.

Accountability

Renoverse is committed to accountability in its data protection practices. This includes implementing internal policies, employee training, and governance measures to ensure compliance with this Policy and applicable data protection laws. We may also conduct audits or assessments to evaluate the effectiveness of our privacy and security practices.

Despite these safeguards, no system can guarantee absolute security. Users are responsible for safeguarding account credentials and should notify us immediately of any suspected unauthorized access to their account.

7. International Users

The Services are primarily intended for users in the United States. However, because users located outside the United States may occasionally submit Personal Information (for example, if a non-U.S. resident enters information into the Services), Renoverse includes provisions consistent with international privacy frameworks such as the EU General Data Protection Regulation (GDPR) and UK GDPR. This ensures that Renoverse remains compliant if it incidentally processes Personal Information from residents of the European Economic Area (EEA), the United Kingdom (UK), or other jurisdictions with comparable data protection laws.

Renoverse may rely on one or more of the following lawful bases when processing Personal Information of individuals subject to GDPR/UK GDPR:

- Performance of a contract with you.
- Compliance with a legal obligation.
- Legitimate interests pursued by Renoverse (provided your rights and freedoms do not override these interests).
- Your consent, where required.

When transferring Personal Information from the EEA, UK, or other jurisdictions to the United States, we implement appropriate safeguards, including the use of Standard Contractual Clauses or other transfer mechanisms approved by relevant authorities.

8. Cookies and Tracking Technologies

We use cookies, pixels, and similar technologies to collect usage information, analyze trends, administer the Services, and track user interactions. These technologies help us recognize your browser or device, remember your preferences, and provide a more personalized experience.

Types of Cookies We Use

- **Essential Cookies:** Necessary for the operation of the Services (e.g., authentication, security).
- Performance and Analytics Cookies: Help us understand how the Services are being used and improve performance.
- Functional Cookies: Enable enhanced functionality and personalization.
- Advertising and Targeting Cookies: May be used to deliver relevant advertising and measure the effectiveness of marketing campaigns.

Your Choices

You can manage cookie preferences through your browser settings, including blocking or

deleting cookies. However, some features of the Services may not function properly if cookies are disabled. In certain jurisdictions, you may also have the right to opt-in or opt-out of specific categories of cookies.

Please see our Cookie Policy for additional details.

9. Your Privacy Rights

Depending on your location, you may have certain rights under applicable data protection laws, including:

- Right to access and obtain a copy of your Personal Information.
- Right to request correction of inaccurate Personal Information.
- Right to request deletion of your Personal Information.
- Right to restrict or object to processing of your Personal Information.
- Right to data portability.
- Right to withdraw consent at any time where processing is based on consent.
- Right not to be subject to automated decision-making, including profiling, where it produces legal or similarly significant effects.

If you are located in the EEA or UK, you also have the right to lodge a complaint with your local Data Protection Authority (DPA) if you believe our processing of your Personal Information violates applicable law.

To exercise these rights, please contact us at <u>legal@renoverse.ai.</u> We will respond to requests as required by applicable law.

9.1 Data Subject Request Handling

Renoverse has established procedures for handling privacy rights requests to ensure compliance with applicable data protection laws:

- **Submission of Requests:** You may submit a request by email at contact@renoverse.ai or through any designated self-service tools in your account.
- **Verification:** We may require you to verify your identity before fulfilling your request, which may include confirming information associated with your account.
- **Timeline:** We will respond to verified requests within forty-five (45) days of receipt [update this timeframe if a shorter or longer period is required under applicable law]. If additional time is needed, we will notify you as permitted by law.

- Authorized Agents: In jurisdictions where applicable, you may designate an authorized agent to submit a request on your behalf. We may require proof of authorization and verification of your identity.
- **Appeals:** If we deny your request, you may have the right to appeal the decision. Instructions for filing an appeal will be provided in our response, where required by law.

10. Lawful Basis of Processing (GDPR/UK GDPR)

When processing Personal Information subject to GDPR or UK GDPR, Renoverse relies on one or more lawful bases, including:

- **Contract:** Processing is necessary to perform a contract with you or to take steps at your request prior to entering into a contract.
- **Legal Obligation:** Processing is necessary to comply with applicable legal obligations.
- **Legitimate Interests:** Processing is necessary for our legitimate interests, provided those interests are not overridden by your rights and freedoms (e.g., improving Services, fraud prevention).
- Consent: Processing occurs with your consent, which you may withdraw at any time.

11. State-Specific Privacy Rights (U.S.)

Certain states provide additional rights to residents:

California (CCPA/CPRA)

If you are a California resident, you have the following rights under the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA):

- **Right to Know:** Request disclosure of the categories and specific pieces of Personal Information we collect, use, disclose, and sell or share.
- Right to Delete: Request deletion of your Personal Information, subject to certain exceptions. - Right to Opt-Out of Sale/Sharing: Direct us not to sell or share your Personal Information for cross-context behavioral advertising.
- **Right to Correct:** Request correction of inaccurate Personal Information.
- **Right to Limit Use of Sensitive Personal Information:** Restrict the use of sensitive Personal Information to necessary purposes.
- **Non-Discrimination:** You will not be discriminated against for exercising your privacy rights.

You may exercise your rights by contacting us at contact@renoverse.ai or by using any available self- service tools provided in your account settings.

Virginia (VCDPA), Colorado (CPA), Connecticut (CTDPA), and Utah (UCPA)

If you are a resident of Virginia, Colorado, Connecticut, or Utah, you may have the following rights:

- Confirm whether we process your Personal Information.
- Access and obtain a copy of your Personal Information.
- Request correction or deletion of Personal Information.
- Opt-out of processing for targeted advertising, the sale of Personal Information, or profiling in furtherance of decisions that produce legal or similarly significant effects.

We will respond to such requests as required by applicable law.

Nevada

Nevada residents may opt-out of the sale of certain Personal Information collected through our Services by contacting us at contact@renoverse.ai.

12. Children's Privacy

The Services are not directed to or intended for children under 18. We do not knowingly collect Personal Information from children under 18. If we become aware that we have collected such information, we will delete it.

If you are a parent or legal guardian and believe that your child under the age of 18 has provided Personal Information to us, you may:

- Contact us at contact@renoverse.ai to request access to the information we may have about your child.
- Request that we correct inaccurate information.
- Request deletion of your child's information from our systems.
- Withdraw any consent that may have been previously provided on behalf of your child.

We will take steps to verify your identity before fulfilling such requests and will respond in accordance with applicable law.

13. Changes to this Policy

We may revise this Policy from time to time in our sole discretion. Material changes will be communicated by posting the updated Policy on the Services and, where appropriate, by additional notice (such as email). Your continued use of the Services after the effective date constitutes acceptance of the revised Policy.

This Privacy Policy should be read together with Renoverse's Terms of Service, which govern your use of the Services. In the event of a conflict between the Terms of Service and this Policy, the Terms of Service will control to the extent permitted by law.

14. Data Protection Officer / Privacy Contact

Because Renoverse's Services are currently limited to the United States, a dedicated Data Protection Officer (DPO) is not required under applicable law. However, if Renoverse expands its Services into the EU or UK and becomes subject to GDPR or UK GDPR, Renoverse will designate a qualified DPO or appoint an external privacy contact to satisfy those requirements. In the interim, you may contact Renoverse regarding privacy matters at:

Email: legal@renoverse.ai

15. Contact Us

If you have questions or concerns regarding this Policy, please contact us at:

Renoverse Al, Corp.

251 Little Falls Drive, In the City of Wilmington, County of New Castle, Delaware 19808 legal@renoverse.ai

Last Reviewed: October 14, 2025

Version: 3