



MAIRA's Privacy Notice

Last updated: 8 August 2025

At Maira Labs, Co., a Delaware c-corp (referred to as "Maira," "us," "we," or "our"), we are dedicated to safeguarding your privacy and ensuring you feel secure when we process your personal data. This Privacy Notice ("Privacy Notice") details how we handle your personal data in compliance with applicable legislation. It applies to our role as a data controller for the personal data of our customers, users of our services, visitors to our websites, and other business contacts. We utilize your personal data to operate our business and fulfill our obligations and responsibilities under applicable legislation and good industry practices.

If you are a user of our services, one of the following user categories applies to you:

- a user that signed up for our services independently in our online purchasing portal or applied for our free services, including the free services we offer within the Civic Tier ("**Self-Serve User**"); or
- a user invited to use a service by a company or other entity which is a customer of ours ("**User of Company Subscriber**"), for example, if you are invited to use the services by your employer.
- you applied for a job at Maira, filled in a survey, or otherwise communicate with Maira, for example through email or social media platforms ("**User of Communication Services**")

Please note that some of our processing of personal data differs depending on what User category applies to you, which is why we ensure to always state in our Privacy Notice if the processing only applies for a particular group of users.

We only use your personal data for the purposes specified in this Privacy Notice and not in any manner that is incompatible with those purposes.

Maira Labs' Role When Processing Your Data

When you use our services as an individual invited by a company subscriber (e.g., your employer), Maira Labs acts as a **service provider**, processing your personal data on behalf of that company. In this scenario, the company subscriber is the data controller and is responsible for informing you about their data processing practices and addressing your data subject rights. We will assist our customers in resolving your concerns as per our contract with them. Additionally, any de-identified data we collect from you on behalf of our customer or receive directly from a customer will be processed only in a de-identified manner, and we will not attempt to re-identify personal data.

For all other personal data processing, **Maira Labs** is the **data controller**. This means Maira Labs is responsible for ensuring that your personal data is processed in compliance with applicable laws. Our contact details are provided at the end of this Privacy Notice if you have any questions regarding how we process your personal data.

Our Use of Your Personal Data



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Collection of personal data

Personal data you provide to us

The personal data that we process about you is data that you have provided us with or that we have otherwise acquired as part of the provision of our services. We collect personal data:

- **Business with company subscriber:** If you are a User of a Company Subscriber, when we initiate a business relationship with a new company subscriber;
- **Account Creation:** When you create an account to use our services, create a new user for that account, or complete transactions through our websites, such as fulfilling an order for our services;
- **Content:** When you provide content to our services, e.g., search queries or uploaded files.
- **Interaction Data:** When you submit user-interaction data, e.g., feedback ratings, to our services;
- **Communication Services:** When you contact our support team or otherwise communicate with us and share information with us through other means such as online forms, websites, emails sent to and from Maira, or social media.
- **Job Applications:** When you apply for a job; or
- **Other events:** When you seek general information about the company, participate in events or surveys.

Personal data that we collect from other sources

We may also collect or receive information about you from other sources such as public registers.

If you are a User of a Company Subscriber, we may collect personal data provided by the company subscriber, for example when the company subscriber invites you to use the service.

We collect personal data from other sources such as:

If you are a User of a Company Subscriber, the company subscriber;
Public registers;
LinkedIn Website Retargeting;
Google Analytics (Google Ireland Limited);
Google Workspace APIs (Google Ireland Limited);
Google Tag Manager (Google Ireland Limited);
Bombora (Bombora, Inc.),
Mutiny (Mutiny HQ Corporation), and
Meta Ads conversion tracking (Meta pixel) (Meta Platforms Ireland Ltd).

The Purposes of Processing

We use your personal data for the following purposes:

If you are a **Self-Serve User**, to provide and manage our services;
If you are a **User of a Company Subscriber**, to administer the agreement with our subscriber;
If you are a **User of Communication Services**, to communicate with you regarding job offerings, surveys, and other communication initiated by you;
Administration and provision of support services and account services;
For statistics, analysis, business development, and improvement of services;
To market our services through newsletters, social media, publications, and events;
To prevent fraud and other abuse;



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To comply with legal obligations;
To establish and defend legal claims; and
To reorganize or make changes to our business.

We may also aggregate or de-identify personal data so that it no longer identifies you and use that information for the purposes described above, such as analyzing how our services are used, improving and adding features to them, and conducting surveys. We will store and use the de-identified information in de-identified form and will not attempt to re-identify it unless required by law.

Categories of Personal Data Processed

| Category | Details |
|--------------------|--|
| User | Name, Email, Username, Password, Alphanumeric identifier, Access level and system role, Profile picture, Custom attributes from Subscriber's pre-approved integrations |
| Content | In-meeting content: video, audio, images, chat, text, recordings, transcriptions, interactive card responses, files, calendar dates, Any content or files provided or uploaded by the user to the platform, Self-paced content: video, audio, images, chat, text, interactive card responses, files, calendar dates, Search queries: end-user's submitted queries, AI chat interactions: messages, reactions, responses, Interaction Data: query ratings, user feedback messages., Created content: authored course content, comments, generative input, uploaded files, videos, images, Third-party content: Content from user's connected integrations |
| Performance | Time, Completion data, Progress, Content assignments, Favorites, Event attendance |
| Device | Browser type, IP-address, Operating system, Location, Locale, Device type, MAC address |
| Activity | Event logs (e.g., action taken, event type, event location, timestamp, client UUID, user ID, and channel ID), Cookies, Session information (e.g., frequency, average and actual duration, quantity, quality, network activity, and network connectivity), Telemetry |



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| Telemetry | In video meetings during Live sessions in Maira Learn: network connectivity information, browser performance, microphone information, camera information, Error and crash information |
| Support | Troubleshooting subject, Problem description |

How We Process Your Personal Data for Each Purpose

Here is a general explanation of each 'legal basis' that Maira relies on to process your personal data to help you understand the table below:

- **Performance of a Contract:** When it is necessary for Maira (or a third party) to process your personal data to provide you with the Maira services we promised you and meet our obligations under the applicable agreement. Where the legal basis for processing your personal data is performance of a contract, and you choose not to provide the information, you may be unable to use the Maira services.
- **Legitimate Interests:** When we process your personal data relying on legitimate interest grounds. This includes our commercial and non-commercial interests in providing an innovative and personalized service to you. Where the table below states that we rely on legitimate interests, we have provided a brief description of the legitimate interest. If you would like more information about this (including the balancing test), please contact us using the methods set out in Section 11 "Contact Details" below.
- **Consent:** When we ask you to actively indicate your agreement to our use of your personal data for a certain purpose of which you have been informed. Where we rely on consent to process your personal data, you can withdraw your consent to such activities at any time. Withdrawal of the consent does not affect the lawfulness of any processing which took place prior to you giving your consent to us.
- **Compliance with Legal Obligations:** When we must process your personal data to comply with a law or regulation in the markets we operate in, such as to comply with our obligations under tax and accounting laws. Where the legal basis for processing your personal data is compliance with legal obligations, and you choose not to provide the information, you may be unable to use the Maira services.

| Purpose | Categories of personal data | What we do | Legal basis | Retention period |
|---|---|--|--------------------------|---|
| If you are a Self-Serve User, to provide and manage our services. | User, Content, Device, User activity, Telemetry, Technical support and feedback, Any additional | We process your personal data in order to provide you with our services and use of our | Performance of Contract. | Personal data stored to provide and manage our services will be stored during the |

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| | information you share through email/chat communication with us | services and to communicate with you. | | time period that it is necessary in order to fulfill the purposes with our processing, which is usually as long as you have an account to use our services or websites, or as set forth in our agreement. We may also need to store your personal data for a reasonable time thereafter in order to fulfill any surviving terms of our agreements. |
| If you are a User of a Company Subscriber, to administer the agreement with our subscribers. | Technical support and feedback, Billing and administration, Any additional information you share through email/chat communication with us | We process your personal data in order to be able to administer the agreement with the Company Subscriber by processing information such as the contact person at the Company Subscriber. | Performance of Contract. Legitimate Interest. The processing is necessary for our legitimate interest in processing your personal data in order to administer the agreement with our customers, which we assess, | Personal data stored to administer the agreement with our customer will be stored during the time period that it is necessary in order to fulfill the purposes with our processing, which is usually as |

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| | | | outweighs the data subjects’ interest in privacy. | long as the agreement is valid, and you are the appointed contact person or similar. We may also need to store your personal data for a reasonable time thereafter in order to fulfill any surviving terms of our agreement with our customer. |
| If you are a User of Communication Services | User, Any information you share through email/chat communication with us | We process your personal data in order to provide communication to you, e.g., in relation to job applications. | Performance of Contract. Legitimate Interest. The processing is necessary for our legitimate interest of processing your personal data in order to respond to communication initiated by you, which we assess outweighs the data subjects’ interest in privacy. | Personal data stored to administer the provision of communication services will be stored during the time period that it is necessary in order to fulfill the purposes with our processing, which is usually as long as you are a user of the services or the communication matter is ongoing. We may also |

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| | | | | need to store your personal data for a reasonable time thereafter in order to administer the ending of your account and fulfill any terms of our agreement with our customer. |
| Administration and provision of support services and account services. | Technical support and feedback, Billing and administration, Any additional information you share through email/chat communication with us | We process your personal data in order to provide our support services, account services, etc. | Performance of Contract. | Personal data stored to administer the provision of the services will be stored during the time period that it is necessary in order to fulfill the purposes with our processing, which is usually as long as you are a user of the services. We may also need to store your personal data for a reasonable time thereafter in order to administer the ending of your account and fulfill any |

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| | | | | terms of our agreement with our customer. |
| For statistics, analysis, business development, improvement of services and recruiting. | User, Content, Device, User activity, Telemetry, Technical support and feedback, Billing and administration, Any information shared through meetings/email/chat communication with us | We use your personal data within our market and customer analyses of our services, which mainly constitute usage statistics, interaction data provided by the User, and data from customer analyses. We also use third-party tracking services to provide relevant and tailored services. We do not share your personal data with our affiliates and/or partners of Maira. The result of our analysis is used to get insight into the needs of our users and understand how we can improve our services. We will ensure the personal data | Legitimate Interest. Processing is necessary for our legitimate interest in analyzing the use of our services and websites in order to improve our business and services or develop new services. Consent. Your consent, in relation to the processing of personal data in the form of cookies that is not necessary for the function of the service, in order to analyze the use of our website and our services. | Personal data stored in order to create statistics, analysis, and business development will be retained as long as necessary to fulfill the purpose, but no longer than one year without anonymizing it. |



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| | | <p>is pseudonymized and anonymized to the extent possible for us to fulfill the purpose of processing. For Self-Serve Users in Maira Agents, which are not within the Civic Tier, we may review your Content to understand the use of our services and improve the user experience. You can opt out of this feature at any time within the Maira Agents platform. We do not review specific Content of Civic Tier Users or Users of Company Subscribers. We, or any of our third-party service providers, do not use your personal data to train artificial intelligence and/or machine</p> | | |
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| | | learning models. | | |
| To market our Company and services through newsletters, social media, publications, and events | User, Billing and administration, IP Address, Any information shared through meetings/email/chat communication with us | We process your personal data within the scope of our marketing, as we provide relevant and tailored communication to our audience. We do not share your personal data with our affiliates and/or partners. | Legitimate Interest. Processing is necessary for the purposes of our legitimate interests to be able to market our services. Maira's legitimate interest outweighs the data subjects' right to privacy as Maira processes personal data that is not characterized by sensitivity to data subjects' integrity and because the data subject has the right to object to the processing of their personal data for marketing purposes. Consent. Your opt-in consent, in relation to our processing of your personal data in social media, | Personal data processed to contact you for marketing purposes will be stored for one year from the date when we collected your data or the date when we last used your data to contact you. You may at any time unsubscribe from our mailings. If you unsubscribe, you will no longer receive mailings. |

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| | | | publications, and events, when the applicable law requires it. | |
| To prevent fraud and other abuse. | User, Content, Device, User activity, Telemetry, Technical support and feedback, Any additional information you share through email/chat communication with us | We process your personal data in order to prevent fraud and other abuse of our services or etc. | Legitimate Interest. Legitimate interest of preventing fraud related to our services and ensuring that our services and/or websites are not used for other purposes than intended. | We will store your personal data for the purposes to prevent fraud and other abuse as long as you are necessary to fulfill the purpose but no longer than one year. |
| To comply with legal obligations. | User, Content, Device, User activity, Telemetry, Technical support and feedback, Any additional information you share through email/chat communication with us | We process your personal data to comply with our legal obligations under applicable law. | Compliance with Legal Obligations. We need to process personal data to comply with our legal obligations under applicable legislation, such as the Anti-Money Laundering Act, the Accounting Act and to respond to your request to exercise your rights | We will store your personal data as long as necessary for us to fulfill our legal obligations. Personal data processed to fulfill legal obligations in the Accounting Act will be stored for seven years. Data processed to fulfill the Anti-Money Laundering Act will be |

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| | | | under the GDPR. | stored for five to ten years depending on the circumstances. |
| To establish and defend against legal claims. | All of the above. | In case of a dispute, we are entitled to process your personal data to establish, exercise, or defend the legal claim. | Legitimate Interest. Establishment, exercise, or defense of legal claims. In case of a dispute, we are entitled to process your personal data since we assess that our interest in safeguarding our interests in a dispute overrides your interest in the protection of your privacy. | We will store your data for the purposes of establishing or defending Maira against legal claims for as long as you can make legal claims against us. This means that we may store personal data during any warranty period and until any limitation period has expired. The general limitation period is ten years under the Act on Limitations. |
| To reorganize or make changes to our business. | All of the above. | In case of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of Maira Lab's | Legitimate Interest. Processing is necessary for the purposes of our legitimate interests of enabling | The personal data will be processed as long as necessary to fulfill the purpose of the processing. |



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| | | assets, we may need to process your personal data in order to enable such transfer. | mergers, divestitures, restructuring, reorganization, dissolution, and other sale or transfers of Maira assets. | Personal data that is transferred to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Maira’s assets will not be stored by Maira after such transfer unless required to fulfill any of the other purposes set out above. |
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If we intend to process your personal data for a new purpose that differs from the original reason for collection and we have not obtained your consent, we will assess whether this new purpose is compatible with the initial one. We will consider any connections between the two purposes to determine if your personal data can be used for this new objective. Otherwise, we will either seek your consent or refrain from processing your data.

Your Rights: You have the right to object to the processing of your personal data when it is based on legitimate interest. If our processing of your personal data relies on your consent, you have the right to withdraw that consent at any time. For further details on your rights, please refer to **Section 7** below.

Automated Decision-Making

We do not use processes for automatic decision-making.



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Retention of Personal Data

Data Retention

We retain your personal data only for as long as necessary to fulfill the legitimate purposes for which it was originally collected, as outlined in this Privacy Notice and relevant privacy and data protection regulations. Once your data is no longer needed, it will be removed from our systems, databases, and backups. The exact retention period varies depending on the context. Where a specific retention time cannot be provided, we will explain the factors that determine it.

If legal restrictions prevent the immediate return or destruction of your data, our company (referred to as "Maira") will inform you and block such data from further processing (except for necessary hosting or processing required by law). Maira will continue to protect the data in its possession, and will require any authorized sub-processors to implement the same protective measures. As soon as legally permissible, Maira will, at your choice, securely delete or return all personal data to you.

For detailed information on data retention periods related to specific processing purposes, please refer to **Section 3. Who Do We Share Your Personal Data With?**

We may share personal data with trusted third parties with whom we have agreements in place to ensure your data is processed in accordance with this Privacy Notice. These recipients may include:

Company Subscriber: If you are a user of a Company Subscriber, your data may be shared with that Company Subscriber under the terms of our Agreement.

Maira Subsidiaries and Affiliates.

Third-Party Service Providers: Our third-party vendors, service providers, and contractors may access your personal data, including raw data obtained from third-party sources like Google Workspace APIs (see section 2.1.2), to perform services for us or on our behalf. This can include providers of:

- Email and electronic communication services
- Tax, legal, and accounting services
- Product fulfillment
- Payment processing
- Customer support
- Fraud prevention and detection
- vData enhancement
- Web hosting and cloud storage
- Research, analytics, artificial intelligence, machine learning, and statistical services

Examples of such providers include Google (Google Ireland Limited), Intercom (Intercom R&D Unlimited Company), Open AI (Open AI LP), Mistral (Mistral AI), Slack (Slack Technologies, LLC), and Segment (Segment.io, Inc.). Neither we nor our third-party service



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providers use your personal data to train artificial intelligence and/or machine learning models.

Other Third Parties: In the event of a reorganization or business change, your data may be shared with a buyer or other successor.

Law Enforcement: Under certain circumstances, we may be required to disclose personal data upon request from authorities or to third parties in connection with court proceedings, business acquisitions, combinations, or similar processes.

We will not sell your personal data.

Where Do We Use Your Personal Data?

International Data Transfers

While Maira primarily processes your personal data within the United States, there may be instances where we or our sub-processors need to transfer personal data to other countries. In such cases, we guarantee a legal basis for the transfer and ensure that the level of data protection is equivalent to that in the US. This is achieved by verifying the destination country has adequate protection, implementing appropriate safeguards like the European Commission's standard contractual clauses, obtaining your explicit consent, or when the transfer is necessary for the purposes outlined in Article 49 of the GDPR.

As the data controller, we are responsible for processing your personal data in compliance with applicable laws and enabling you to exercise your rights. You can contact us at any time to exercise your rights using the contact details provided at the end of this Privacy Notice.

We are obligated to respond to your requests within one month of receipt. For complex requests or a high volume of requests, we may extend this deadline by an additional two months. If we cannot fulfill your request within one month, we will inform you of the reason for the delay and your right to lodge a complaint with a supervisory authority or seek judicial remedy.

You will not be charged for information, communication, or actions we take to address your requests. However, if your request is clearly unfounded or excessive, we reserve the right to charge an administrative fee or refuse to act on your request. Your Rights: Access, Rectification, Erasure, and Restriction

As a data subject, you have the following rights:

- **Access to your personal data:** You have the right to request access to the personal data we hold about you. You are entitled to a free copy of the personal data we are processing. We may charge a reasonable administrative fee for additional copies. If you make an electronic request (e.g., via email), we will provide the information in a commonly used electronic format.
- **Rectification of your personal data:** At your request or on our own initiative, we will correct, anonymize, delete, or complete inaccurate, incomplete, or misleading data. You

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also have the right to complete any incomplete personal data if relevant information is missing.

- **Erasure of your personal data:** You have the right to request the deletion of your personal data if there is no compelling reason for us to continue processing it. Personal data should be erased if:
 - It is no longer needed for the purpose for which we collected it.
 - We process your personal data based on your consent, and you withdraw your consent.
 - You object to our processing of your data based on a legitimate interest assessment, and we have no compelling interest that overrides your interests and rights.
 - We have processed the personal data unlawfully.
 - We have a legal obligation to erase personal data.However, legal requirements or other compelling reasons may prevent us from immediately erasing your personal data. In such cases, we will cease processing your personal data for purposes other than compliance with the law or where there are no compelling legitimate grounds for doing so.
To exercise your right to erasure, please complete the provided form and send an email with the subject line "Erasure of Personal Data Request" and the attached form to privacy@maira.one. We will confirm receipt and take reasonable steps to verify your identity as the data subject. Upon verification, we will complete the erasure without undue delay.
- **Restriction of processing:** This means we will temporarily restrict the processing of your data. You can request restriction under specific conditions, such as when: you believe your data is inaccurate and have requested rectification (as defined above) while we verify its accuracy; the processing is unlawful, and you do not want the data erased; as the personal data controller, we no longer need the personal data for our processing purposes, but you require it to establish, exercise, or defend a legal claim; or you have objected to processing as defined in Section 9.3.1, pending our consideration of whether our legitimate interests override yours.

We will take all reasonable measures to notify anyone who has received personal data (as stated in **Section 7** above) if we have rectified, erased, or restricted access to your personal data following your request. If you request information on recipients of your personal data, we will inform you about them.

- **Right to Object:** You have the right to object to the processing of your personal data if our processing is based on legitimate interests (see **Section 3** above). If you object, we will only continue processing your data if we have compelling reasons to do so that override your interests.
- If you do not wish us to use your personal data for direct marketing, you have the right to object by contacting us. We will cease using your data for that purpose once we receive your objection.
- **Right to withdraw your consent:** When your consent is required for us to process your personal data, you always have the right to withdraw such consent at any time by contacting us.
- **Right to data portability:** You have the right to data portability. This means you can receive your personal data in a structured, commonly used, and machine-readable format, and request that this data be transferred to another personal data controller. The right to data portability applies only when processing is carried out by automated means



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and our lawful basis for processing your data is the performance of an agreement between you and us or your consent.

- **File a complaint:** You have the right to lodge a complaint with a relevant supervisory authority if you are dissatisfied with our processing of your personal data.

Protection of Your Personal Data

We want you to always feel confident when providing us with your personal data. Therefore, we have implemented appropriate security measures to protect your personal data against unauthorized access, alteration, and erasure. While we strive to protect your data, no security measures are perfect or impenetrable. Should a security breach occur that could materially impact you or your personal data (e.g., risk of fraud or identity theft), we will contact you to explain what actions you can take to mitigate potential adverse effects of the breach.

We strongly advise you to be cautious and protect your own personal data. You are responsible for keeping your passwords confidential and preventing others from observing your personal data when using our services in public spaces.

Collection of Personal Data from Children

Our services are not intended for children under 18 years of age, with the exception of free services offered to Civic Tier users aged 13 and above.

We do not knowingly collect personal data from children under 13 under any circumstances. If you believe that a child under 13 has provided personal data to Maira through our service, please contact us immediately at privacy@maira.one. We will investigate all reports and, if applicable, delete the personal data from our systems.

Use of Cookies

We utilize cookies, which may contain personal data, to enhance, analyze, and manage our websites, services, and your overall experience. For more detailed information, please refer to our **Cookie Notice**.

Amendments to this Privacy Notice

We reserve the right to modify this Privacy Notice at any time. In the event of significant changes that materially affect you, we will notify you of these changes and their implications before they take effect.

Contact Us



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Should you have any questions regarding this Privacy Notice, our processing of your personal data, or if you wish to exercise your rights, please do not hesitate to contact us.

Maira Labs, Co. is the data controller for your personal data processed under this Privacy Notice, unless you are a User of a Company Subscriber. You can reach our team by emailing our Privacy Mailbox at **privacy@maira.one**. Alternatively, you may direct any privacy-related inquiries to our Support Team via the Maira platform.

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E-mail: legal@maira.one

Website: <https://maira.one/>