

Privacy Policy

Lightbulb, Inc. (“Lightbulb”, “we”, “us”, “our”) has developed a unique type of emotion-sensing artificial intelligence software that is used in a variety of ways, including analyzing viewers reactions to digital content and analyzing emotions and cognitive states of users / testers. Through Lightbulb’s software development kits (“SDKs”), developers can integrate Lightbulb technology into a variety of applications.

This privacy policy describes the types of personal information we collect and process, how we use it, how long we keep it, when it is shared, how you can manage it, and how we secure it. Our agreements with customers may also include provisions related to use and retention of personal information which, with respect to those customers, would take precedence over the general rules specified in this Privacy Policy.

If you have questions or concerns about your privacy, please notify us by contacting info@thelightbulb.ai.

What kinds of information do we collect?

We collect information related to individuals who access our products and services (our “Products”), such as our customers’ employees or others authorized by our customers to use our Products. This may include information to provide log-in credentials, to communicate with our customers and for billing and support purposes. This information may include names, email addresses, physical addresses, and phone numbers. For billing purposes, it may also include financial and payment processing information, including transaction information, bank or credit card account information, and authentication information. We also collect information related to individuals’ use of our Products.

We collect information related to persons who we believe might be interested in our Products and media and industry contacts for use in marketing and promotional activity. This information may include names, email addresses, physical addresses, phone numbers, employer, and job title.

We collect camera feed and audio recordings of users / testers which our Products analyze to detect the emotions of the subjects of those recordings. This may include metadata related to such recordings, such as the location the recording was made.

We capture user’s device’s front camera feed to analyze facial expressions solely for the purpose of conducting research studies. The facial data processed may include features such as head position, gaze direction, eye openness, and other non-identifying facial metrics required for study-related emotion or attention analysis.

However such data is used only to generate anonymized analytical results for the research study in which you are participating. This data is never used for identification, authentication, marketing, or any purpose unrelated to the study.

Face data is collected only after obtaining explicit, informed consent from the participant. The facial data processed is limited to non identifying facial metrics such as head position, gaze direction, eye openness, and expression related signals. This data is not used for identification, authentication, marketing, advertising, or any purpose unrelated to the research study.

We also receive information related to uses of our technology and video and audio recordings from app developers who use our SDKs to integrate Lightbulb technology into their applications.

We collect information from visitors to our website, including the pages visited, how long individuals viewed each page, the devices used when visiting our website, and information from “cookies” (see below).

We also collect and retain personal information relating to our employees as necessary to run our business and personal information submitted by job applicants.

How do we use this information?

We use this information:

- to communicate with our customers regarding their use of our Products by analyzing the facial coding, eye tracking data extracted from faces identified from users’ camera feed and screen recording vocal expressions and sentiments extracted from audio feed
- to provide technical support to our customers,
- to bill our customers and communicate with them regarding their accounts,
- to provide information and engage in marketing activities regarding our Products,
- to maintain and submit the data as per the applicable legal provisions of the jurisdictional region of Lightbulb and of its customer’s
- to enable use of our Products
- to improve our Products,
- for job applicants, to use in the hiring process, and for employees, to use in connection with their employment with Lightbulb.
- to conduct research studies relating to emotion, attention, and cognitive response analysis, based solely on participant consent, and without using face data for identification, profiling, or marketing purposes.

How long do we keep this information?

Information related to an individual associated with any of our customers is retained while the customer relationship is in place (and to complete any post-termination transactions or wind-down of activities) or until we are advised that the individual is no longer associated with that customer. **All face-derived data is deleted after 12 months from the study’s end date.**

This 12-months retention period is required to:

- complete study-related analysis,
- validate results,
- allow researchers to address participant-requested corrections, and
- ensure data accuracy for final reporting.

After this period, the data is permanently deleted from all systems and backups.

This retention period applies across all systems, including those operated by our contracted service providers. Face data is retained only for the purpose of completing study related analysis, validating results, addressing participant requested corrections, and ensuring accuracy of final reporting. After the retention period, the data is permanently deleted from active systems and backups.

Information related to individuals who are contacted for marketing and promotional purposes is retained until they indicate they no longer wish to be contacted (e.g., unsubscribing from email solicitations).

Information related to individuals may also be deleted when the purpose for which the information was being used no longer exists.

When do we share personal information?

We do not sell or rent your personal information to third parties for purposes unconnected to our uses of the information described above. However, we may provide personal information to other parties to help us accomplish the uses described above. Such sharing of information includes:

parties which we contract with to help us provide the Products, including subcontractors, agents and third-party service providers (such as data centers), parties who assist us in our marketing and promotional programs, and parties which assist us with payment processing services.

Face Data and Third Party Processing. We share face data only with contracted service providers acting as data processors to enable secure hosting, processing, and analysis required for research studies. These service providers include cloud infrastructure and analysis platforms such as Amazon Web Services and AWS Rekognition. Face data is shared solely on our documented instructions and is not permitted to be used by third parties for their own purposes. Third party service providers may temporarily store face data only to provide the contracted services.

We provide the third parties with the minimum amount of personal information necessary to fulfill the terms of the predetermined service or transaction, and none of these third parties are permitted to use your personal information except for the purpose of providing a specific service on behalf of Lightbulb.

We may also provide information to third parties in connection with legal matters, which includes:

- providing information where we are legally obligated to do so (such as subpoenas or court orders), and
- in connection with the investigation, prevention or assisting law enforcement with respect to suspected or known illegal activities, fraud, threats, violations of our terms of service, or as otherwise required by law.

How can I manage my personal information retained by Lightbulb?

You are in control of whether or not you give us personal information, and you are free at any time to ask us to delete any personal information you have provided. EU individuals have the right to access their personal information. Upon request, and with consent of our customers, Lightbulb will grant individuals access to personal information that it holds about them. Please contact us at info@thelightbulb.ai to access, edit or delete your personal information. Please note that in the event of a deletion, Lightbulb may need to retain some personal information for the period of time necessary for legal proceedings, legal or audit requirements or for settling your account.

If you want to opt out from receiving promotional email from Lightbulb, send an email including your name and email address to info@thelightbulb.ai. If you receive an email using the Lightbulb name that you suspect might be spam, please contact us at info@thelightbulb.ai.

How do we secure your information?

Lightbulb is committed to protecting the Personal Information you share with us. We utilize a combination of industry-standard security technologies, procedures, and organizational measures to help protect your Personal Information from unauthorized access, use or disclosure.

We strongly encourage you to take every possible precaution to protecting your Personal Information when you are on the Internet. Good methods of protecting private information include change your passwords often, use a combination of letters and numbers when creating passwords, make sure you use a secure browser and protect emails through encryption.

Provisions Specific to EU Citizens

- Rights of EU Citizens Under the GDPR
- If you are a citizen of the European Union, you have certain rights relating to how others handle your personal information. These rights are:
 - The right to be informed how your personal information is being used. •
- The right of access your personal information and how it is processed.
- The right to rectify personal information which is inaccurate or incomplete.
- The right to erasure – also known as ‘the right to be forgotten’, this refers to an individual’s right to having their personal data deleted or removed.
- The right to restrict processing, that is, the right to block or suppress processing of your personal data.
- The right to data portability – this allows individuals to retain and reuse their personal data for their own purpose.
- The right to object, in certain circumstances, to use of your personal data in a manner different from the purpose for which it was provided.
- Right to prevent automated decision making or profiling based on your data without human intervention.

Identity of Data Controller

When an individual is providing personal information in connection with use of our Products in their capacity as an authorized user of a company which does business with Lightbulb, the data controller is generally going to be that company. This will also be true where personal information is being collected by Lightbulb in connection with use of a third-party product which was developed using the Lightbulb SDK.

If an individual is providing personal information directly to Lightbulb, for example, as an Lightbulb employee, a visitor to Lightbulb's website, or a party consenting to receive information regarding Lightbulb and its Products, then Lightbulb is generally going to be the data controller. In circumstances where Lightbulb is the data controller, you can contact us at the email and physical addresses provided above in the section named "How can I manage my personal information retained by Lightbulb?"

"Personal Information" is any information that can be used to identify an individual, and may include, but is not limited to, name, email address, postal or other physical address, credit or debit card number, title, and other information required to provide or deliver a Product, or carry out a transaction you have explicitly requested. If you give us Personal Information, we will treat it according to this policy.

Definition of the Parties Who Use Our Services and/or Access our Site:

Customers are companies that have licensed Lightbulb's technology for use in conjunction with products and services they offer to other companies or individuals. Examples of Lightbulb Customers are advertising agencies and/or public relations firms that contract with us to use Lightbulb technology to analyze videos of individuals viewing advertisements and other digital content on behalf of their Clients. In the course of fulfilling our contractual obligations with our Customers, it will sometimes be necessary for us to receive and maintain personal contact information. Lightbulb Customers may be granted access to protected areas of the website. In order to do so, they may need to activate a Lightbulb Web account that requires the use and storage of some Personal Information.

Lightbulb provides its market research Customers with both technical and non-technical support options. Lightbulb also provides support to SDK developers. When you contact customer support (info@thelightbulb.ai), your inquiry and relevant Personal Information will be added to a support database to enable an appropriate response. Lightbulb may also store relevant Personal Information to manage Customer feedback.

Clients refers to the parties who are represented by our Customers. Lightbulb does not have a direct relationship with these entities.

Individuals refers to the people who serve as data subjects for our Customers and/or their Clients. Facials videos of Individuals will be analyzed using Lightbulb's technology to evaluate the Individuals' emotional response to advertisements or other digital content. Individuals may also provide personal information in connection with this activity. Most, if not all, of the individuals have been solicited by our Customers or their Clients and have entered into agreements with our Customers or their Clients which describe the terms under which they will act as data subjects. As

with the Clients, we have no direct relationship with these Individuals and the identifying information they provide may be forwarded to us by our Customers. Occasionally, Individuals may come to our site of their own accord to investigate our product or learn more about our specific technology.

Individuals may also from time, to time, include our employees who serve as beta testers for quality control purposes. In the case of our employee data, nothing within this context is HR data that is subject to the employment relationship, and they are not part of any market studies conducted by our Customers.

Lightbulb provides individuals the opportunity to contact us with job inquiries by contacting info@thelightbulb.ai. If you send Lightbulb a resume or other documents containing Personal Information, it may be entered into a recruitment database. You may receive inquiries from Lightbulb or our affiliates in response to your inquiry.

Collection and use of your Personal Information

The reasons we collect and use your Personal Information are outlined below. If you enroll under “Get more information”, You may receive periodic calls or emails from our team in order to facilitate your request. Lightbulb may provide enrollees with the latest product announcements, software updates, software and system enhancements, special offers, and other information. Enrollees may also be contacted by Lightbulb or its trusted partners with offers to participate in surveys aimed at improving our Products.

If you are a Lightbulb Customer, you may provide us the names of individuals within your company, as well as physical addresses, payment information, email addresses and or telephone number. Lightbulb may need to use this information to verify credit card information, process payments and to provide services and support. Lightbulb may make use of a trusted third party to process your payment and in these cases, we will share your billing information with that party. If you are a Lightbulb Customer, you may also receive product updates or other information from our team.

Lightbulb offers Professional Services as well as software products. If you or your company have entered into a Lightbulb Professional Services agreement, please be aware that the terms of that agreement may include provisions that require the collection of Personal Information. These terms may take precedence over this Policy. We encourage all of our Customers to meet or exceed our standards for the protection of Personal Information. We will work with you to follow the highest integrity ethical standards, especially in the treatment of people as participants in data-collection studies. If you sign up under “Get more information”, Lightbulb will try to send you the requested information. You may receive periodic calls or emails from our team in order to facilitate your request. Lightbulb may provide enrollees with the latest product announcements, software updates, software and system enhancements, special offers, and other information. Enrollees may also be contacted by Lightbulb or its trusted partners with offers to participate in surveys aimed at improving our Products.

Choice:

If you ever opted in to receive mail from Lightbulb and now want to opt out, send an email including your name and email address to info@thelightbulb.ai. If you receive an email using the Lightbulb

name that you suspect might be spam, please contact us at info@thelightbulb.ai.

- Participating in opt-in video collection

Lightbulb provides people with opportunities to participate in interactive web applications in which data will be collected. Data will never be collected without informed consent. The data may include a subset of the following categories:

- ◆ Video from a participant's webcam
- ◆ Affective data derived from video Text
- ◆ data from survey responses

By Its nature, video data of Individuals is personal, so Lightbulb takes the process of recording participant video very seriously. Lightbulb will never associate data with an Individual without the Individual's consent. By default, Lightbulb will only use video data to analyze the Individual's emotional reaction to content the Individual is viewing and to train its computer algorithms around measurement and communication of emotion and will not share video data that has not been anonymized with outside groups. On occasion, Lightbulb provides people with an opportunity to explicitly opt-in to allow for their video data to be used in broader research or experimental purposes. Likewise, visitors to our website who view our demo, in which they are recorded watching a sample ad, will be explicitly cued to opt-in prior to the beginning of the session.

Anonymous information collection

In some instances, Lightbulb may collect non-personal aggregate or demographic data through cookies, web logs, and web beacons. This information may be used to better understand and improve the usability, performance, and effectiveness of the website. Please read the "Cookies" section below for more information. In addition, by using some of our Products, anonymous network information (not including Personal Information) may be transmitted back to us such as Product usage information. This information is transmitted back to us so we can determine how users are interacting with our Products, to assist us as we consistently improve our Products and to correct any problems that may occur.

Cookies web logs and web beacons

Like many websites, Lightbulb uses technologies, such as cookies and web beacons, which allow us to make your visit to our website easier, more efficient and more valuable by providing you with a customized experience and recognizing you when you return.

Our cookies do not read personal data off of your hard disk or read cookie files created by other sites. The only Personal Information that a cookie can contain is that which you explicitly consent to supply. Accepting the cookies used on our website may give us access to information about your browsing behavior while on our web pages, which we may use to personalize your experience and track user traffic patterns. We do this in order to determine the usefulness of our website information based on the needs of our users, and to assess how effectively our navigational structure helps users reach needed sources of information. You may browse most of Lightbulb's website

without accepting cookies from Lightbulb; however, some website functionality may be lost by disabling cookies on your computer. Other Lightbulb web pages, particularly those that require a login and password, require cookies and cannot be used when you have disabled cookies in your browser.

Web logs and web beacons are ways of gathering basic statistics and managing cookies, and do not extract any extra information from your computer. Turning off your browser's cookies will prevent web logs and beacons from tracking your specific activity.

If you prefer not to receive cookies while browsing our website or via HTML-formatted emails, you can set your browser to prompt you before it accepts cookies or refuse the cookie when your browser alerts you to its presence. You can also refuse all cookies by turning them off in your browser.

Linked websites and third-party services

Our websites and services may provide links to third-party websites and services that are outside our control and not covered by this policy. We encourage you to review the privacy policies posted on these (and all) sites you visit or services you use.

Children's privacy

Lightbulb's website does not knowingly collect Personal Information from children under the age of 13, without parental consent. If we learn that we have collected Personal Information on a child under the age of 13, without parental consent, we will erase that data from our systems. Lightbulb encourages parents and guardians to monitor the online activity of children in their care. Here are a few tips to help make a child's online experience safer:

- Teach children never to give Personal Information (such as name, address, phone number, school, etc.) unless supervised by a parent or responsible adult
- Know the sites your children are visiting, and which sites are appropriate Review website privacy policies and be aware of how your child's information is treated We encourage you to visit the Federal Trade Commission's website for information regarding initiatives designed to protect children's privacy online.

Consent to the transfer, processing and storage of Personal Information:

We reserve the right to transfer your Personal Information gathered from our website (this includes video as well as demographic information) to any Lightbulb affiliate worldwide, as well as to third parties acting on our behalf, for the purposes of processing or storage of data. By providing any of your Personal Information, you fully understand and consent to such transfer, processing and storage of such information.

Lightbulb is required to disclose personal information to public authorities if they provide lawful requests for reasons of national security or law enforcement.

Accessing and updating your Personal Information

You are in control of whether or not you give us Personal Information, and you are free at any time to ask us to delete any personal information you have provided. EU individuals have the right to access their personal information. Upon request, and with consent of our Customers, Lightbulb will grant individuals access to personal information that it holds about them. Please contact us at account-updates@thelightbulb.ai to access, edit or delete your personal information. Please note that in the event of a deletion, Lightbulb may need to retain some Personal Information for the period of time necessary for legal proceedings, legal requirements or for settling your account.

Unsubscribing

Lightbulb does not give out your Personal Information without your prior consent. By signing up for email notifications you are consenting to being contacted by the Lightbulb sales and marketing team or their representatives.

Each promotional email from Lightbulb or from parties to whom Lightbulb has given your email address with your prior consent includes instructions on how you can unsubscribe from that category of mailing or from receiving email from that third party. You may also unsubscribe from Lightbulb's promotional emails by sending an email, including your name and email address to i

Lightbulb will work diligently to update these settings in a timely manner: please allow 2-4 weeks for account updates to take effect. If you have additional questions regarding your information disclosure choices or Lightbulb's policies regarding receipt of promotional email, you may contact Lightbulb by sending an email with your name and email address to info@thelightbulb.ai.

Sharing your Personal Information

We do not sell or rent your Personal Information to others unless you have granted us permission to do so in advance. We may share your Personal Information within Lightbulb and its affiliated companies and with third party service providers only for purposes of data processing or storage that are in accord with your informed consent. By using the products, Customers are consenting to the terms of this privacy policy.

If necessary, to provide you with a Product or transaction you request, then we may also share your Personal Information with business partners, service vendors, authorized third-party agents or contractors.

We provide the third parties with the minimum amount of Personal Information necessary to fulfill the terms of the predetermined service or transaction, and no third parties are permitted to use your Personal Information except for the purpose of providing a specific service on behalf of Lightbulb.

Under certain circumstances, Lightbulb may be legally obligated to disclose your Personal Information (e.g. subpoenas, court orders, etc.). At our discretion, we also may elect to exercise our legal rights to defend against legal claims.

We may collect and possibly share Personal Information and any other additional information available to us in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of Lightbulb's Terms of Service, or as otherwise required by law.

While navigating Lightbulb's web site or computer-based Products, you may be directed to content or functionality that is hosted by a third-party supplier. When Personal Information is collected on behalf of Lightbulb exclusively, Lightbulb's Privacy Policy will be referenced and will dictate how your Personal Information will be used. For other, non-Lightbulb sites or services, the site or service provider's privacy policy should be consulted.

We will ask for your consent before we use or share your Personal Information for any purpose other than the reason you provided it or as otherwise provided by this policy. In order to let us know your preferences, we will require an action on your part, such as checking the appropriate option, to indicate your consent.

Security of your Personal Information

Lightbulb is committed to protecting the Personal Information you share with us. We utilize a combination of industry-standard security technologies, procedures, and organizational measures to help protect your Personal Information from unauthorized access, use or disclosure.

When we transfer credit card information over the Internet, we protect it using Secure Sockets Layer (SSL) encryption technology. While we strive to protect your Personal Information, we cannot ensure the security of the information that you transmit to Lightbulb, please make sure that you protect yourself by never sending Personal Data over an unsecure connection.

We strongly encourage you to take every possible precaution to protecting your Personal Information when you are on the Internet. Good methods of protecting private information include change your passwords often, use a combination of letters and numbers when creating passwords, make sure you use a secure browser and protect emails through encryption.

Consent to the transfer, processing and storage of Personal Information:

We reserve the right to transfer your Personal Information gathered from our website to any Lightbulb affiliate worldwide, as well as to third parties acting on our behalf, for the purposes of processing or storage. By providing any of your Personal Information, you fully understand and consent to such transfer, processing and storage of such information.

Refund & Cancellation Policy

Instances of Refund

Any amount once paid through the payment gateway shall not be refunded other than in the following circumstances:

- Multiple debits of Customer's Card/Bank Account due to a technical error OR if the Customer's account has been debited with an excess amount in a single transaction due to a technical

error.

In such cases, the excess amount excluding the Payment Gateway charges for the transaction would be refunded to the Customer.

- Due to a technical error, the payment has been charged on the Customer's Card/Bank Account but the enrolment for the services is unsuccessful. The Customer would be provided with the enrolment by Lightbulb at no extra cost. However, if in such cases, the Customer wishes to seek refund of the amount, then he/she would be refunded the net amount, after deduction of Payment Gateway charges or any other applicable charges.

Process for Refund

The Customer will have to make an application for refund along with the transaction number and original payment receipt if any generated at the time of making payments.

1. The application in the prescribed format should be sent to sales@thelightbulb.ai
2. The application will be processed manually and after verification, if the claim is found valid, the excess amount received will be refunded by MTPL through electronic mode in favor of the applicant and confirmation sent to the mailing address given in the online registration form, within a period of 21 calendar days on receipt of such claim. It will take 3-21 days for the money to show in your bank account depending on your bank's policy.
3. Company assumes no responsibility and shall incur no liability if it is unable to affect any Payment Instruction(s) on the Payment Date owing to any one or more of the following circumstances:
 - If the Payment Instruction(s) issued by you is/are incomplete, inaccurate, and invalid and delayed.
 - If the Payment Account has insufficient funds/limits to cover for the amount as mentioned in the Payment Instruction(s)
 - If the funds available in the Payment Account are under any encumbrance or charge. ○ If your Bank refuses or delays honoring the Payment Instruction(s)
 - Circumstances beyond the control of Company (including, but not limited to, fire, flood, natural disasters, bank strikes, power failure, systems failure like computer or telephone lines breakdown due to an unforeseeable cause or interference from an outside force)
 - In case the payment is not reflected for any reason, you will be intimated about the failed payment by an e-mail

User agrees that Company, in its sole discretion, for any or no reason, and without penalty, may suspend or terminate his/her account (or any part thereof) or use of the Services and remove and discard all or any part of his/her account, user profile, or his/her recipient profile, at any time.

Company may also in its sole discretion and at any time discontinue providing access to the Services, or any part thereof, with or without notice. User agrees that any termination of his /her access to the Services or any account he/she may have or portion thereof may be effected without prior notice, and also agrees that Company will not be liable to user or any third party

for any such termination. Any suspected, fraudulent, abusive, or illegal activity may be referred to appropriate law enforcement authorities. These remedies are in addition to any other remedies Company may have at law or in equity. Upon termination for any reason, user agrees to immediately stop using the Services.

4. Company may elect to resolve any dispute, controversy or claim arising out of or relating to this Agreement or Service provided in connection with this Agreement by binding arbitration in accordance with the provisions of the Indian Arbitration & Conciliation Act, 1996. Any such dispute, controversy or claim shall be arbitrated on an individual basis and shall not be consolidated in any arbitration with any claim or controversy of any other party.

[Download Annexure](#)

Updates to the Privacy Policy

We may update this policy from time to time. If you choose to opt in to email notifications by emailing get-info@thelightbulb.ai, you will be informed when changes take place. Whether or not you chose to receive notifications via email, our website will indicate when the policy has been altered. You may access the current version at any time by clicking on the “Privacy Policy” link at the footer on our website. Your continued use of the Lightbulb website or Products, thereafter, serves as binding confirmation that you agree with such changes.