

# Cosmos Continuum Privacy Policy

**Last Updated:** June 2022

This is the Privacy Policy for the cosmoscontinuum.com website and the Cosmos Continuum mobile Apps ("Products") owned and operated by Cosmos Continuum ("we," "our" "us" "Company"), a Florida LLC company. Throughout this Privacy Policy, we make reference to the Personally Identifiable Information ("PII") that we collect. This refers to information about you as an individual, such that your identity can be reasonably ascertained. For example, your name, telephone number and email address together are considered PII.

## Information We Collect

We receive and store information you give us when you use the services of our Products. For example, we collect information when you provide PII during account signup or you communicate with us by email for any purpose. The website collects general, statistical, Non-Personally identifiable Information ("Non-PII"). This Privacy Policy does not apply to information that you may provide to us, or that we may obtain (other than through our Products) such as by phone, postal mail, print or publicly available sources. This Privacy Policy does not apply to information collected about you by anyone except the Company, and it only applies to the cosmoscontinuum.com website and the Company's Products.

## Information Collected by Our Developer Tools

The company's Product is built using the Unity game engine and Vuforia AR platform. The automatic collection of unique device identifiers and hardware statistics by the Unity game engine has been disabled. You can access the Unity Privacy Policy at <https://unity3d.com/legal/privacy-policy> and the Vuforia Privacy Policy at <https://www.ptc.com/en/documents/policies/privacy>.

1. The Vuforia AR platform may collect the following information (collectively "statistics"):
  - Information about the end users' devices such as:
  - Make, model and firmware version of the user's device
  - Operating system name and version number of the user's device
  - Camera profile version
2. Information about the Software used to create the Developer Application such as:
  - Vuforia API version
  - Vuforia license keys for mobile and digital eyewear licenses
  - Cloud Recognition client key for apps that utilize Cloud Recognition (This feature is not utilized by the Product)
3. Information about the Developer Application and its use such as:
  - Application bundle ID

- Application version, for tracking application upgrades
- Application's App Store ID recorded for Google Play Store
- Initial application session timestamp, for the first time an app is launched after being installed on a device
- Camera start and stop times. This is only recorded when the Vuforia app process is running.
- Vuforia application process start / stop / resume timestamps
- Recognition event timestamps
- Log Data file configuration defines frequency and file size of the log file to be submitted to PTC
- Tracker state detected / tracking / lost timestamps
- Target created / destroyed timestamps
- Virtual button created / destroyed timestamps (This feature is not utilized by the Product)
- Virtual button pressed / released timestamps (This feature is not utilized by the Product)

4. The IP address used by the end user's device for the purpose of inferring the country / region of use (but not the exact location).

5. Images submitted with Cloud Recognition queries in order to match image for a Recognition event (This feature is not utilized by the Product).

## **How is the collected data retained?**

The Product is built using the Unity game engine and Vuforia AR platform. Data collection by the Unity game engine has been disabled. PTC Inc. is responsible for the storage of data collected by the Vuforia AR platform. The Product data is stored on a secure server.

## **Governing Law**

This Privacy Policy shall be interpreted under the laws of the United States and the State of Florida.

## **Modification of Products**

You understand and agree that by visiting cosmoscontinuum.com or by entering PII into our Products, you are accepting, without modification, this Privacy Policy. If you disagree with any portion of this Privacy Policy, then your only option is to not use cosmoscontinuum.com or the Company's Products.

This Privacy Policy is subject to change from time to time by Cosmos Continuum. Material changes to this Privacy Policy will be indicated by a revised effective date at the top of this page. Whether or not you are a registered member of Cosmos Continuum, it is your responsibility to check back and review this page regularly to

ensure you are familiar with the most current privacy terms. Should you object to any such modifications to this Privacy Policy or become dissatisfied with Cosmos Continuum in any way, your only option is to immediately discontinue the use of our Products. Your continued use of the service after the effective date of the current Privacy Policy revision means that you agree to be bound by the changes, without modification.

## **How We Use Your Information**

Your PII encrypted data is used to present a tailored experience. We cannot publish your operational or profile data in any personally identifiable way. We DO NOT sell or share your PII to third parties, advertisers or mass marketers. Additionally, your PII is encrypted and not stored as a record that could be easily constructed. It is important to note that your PII is not available, readable or accessible to employees of the Company. Your PII, once entered into the Cosmos Continuum app is stored on an encrypted server that can only be accessed by the Cosmos Continuum software and cannot be shared with the Company's clients.

## **Legally Compelled Disclosures**

We reserve the right to release account information:

- When we believe release is appropriate to comply with the law
- At the request of any judicial, administrative or similar proceeding such as a subpoena
- To investigate suspected fraud, harassment, physical threats, or other violations of any state or federal law, rule or regulation
- To protect the rights, property, or safety of our services, our users, or others
- Or to enforce or apply other agreements.

## **Business Transfers**

As our business continues to grow, we may acquire or sell a business. We reserve the right to transfer customer information in connection with such a transaction, but such information remains subject to the provisions of any pre-existing Privacy Policy. In the event that the Company or substantially all of its assets are acquired, customer information may be one of the transferred assets.

## **Your legal rights in the EU and the UK**

If you are based in the EU or the UK, you have rights under the EU-GDPR And the UK-GDPR in relation to your personal data. You have the right to:

- Request access to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request a correction of the personal data we hold about you. This enables you to

have any incomplete or inaccurate data corrected, though we will verify the accuracy of the new data that you provide to us.

- Request erasure of your personal data. This enables you to ask us to delete or remove personal data when there is no reason for us to continue processing it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your erasure request for specific legal reasons which will be disclosed to you, if applicable, at the time of your verified request.

- Object to your personal data's processing where we are relying on a legitimate interest (or those of a third-party). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which overrides your rights and freedoms.

- Object to where we are processing your personal data for direct marketing purposes.

- Request restriction of your personal data processing. You may request us to suspend your personal data processing under the following scenarios:

- You want us to establish the data's accuracy.
- Where our use of the data is unlawful, but you do not want us to erase it.
- Where you need us to hold the data for you if you need the data to establish, exercise or defend legal claims.

- You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

- Request the transfer of your personal data to you or to a third-party. We will provide to you, or a third-party you have chosen, with your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to information which you initially provided with your consent for us to use or where we used the information to draw up a contract with you.

- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect your data's use or processing that was carried out before you withdrew your consent. If you withdraw your consent, we may not be able unable to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

The Product does not save PII in a readable format. You control what goes in to the Product and can update it in the future. Your PII is only used when a visual trigger is engaged on the product by you.

## California Privacy Rights

Under the CCPA California residents have the right to manage their personal data similar to the rights granted in the GDPR for EU and UK data subjects.

These rights can be categorized into four key elements:

- Right to Disclosure
- Right to Deletion

- Right to Opt-Out
- Right to Nondiscrimination

California residents also have the right to receive information that identifies any third-parties with whom we have shared your personal data for that third-party's own marketing purposes within the previous calendar year, as well as a description of the categories of Personal Information disclosed to that third-party. The Product does not save PII in a readable format nor can it be used for marketing purposes. You control what goes in to the Product and can update it in the future.

## **Children's Online Privacy Protection Act (COPPA)**

The Company's Product is built using the Unity game engine and Vuforia AR platform and the Vuforia AR platform (PTC Inc.) collects Statistics which are listed in the "*Information We Collect*" section of this privacy policy. Statistics collection by the Vuforia AR platform include the IP address of the user's device. No other personal information is collected by the Vuforia AR platform (PTC Inc.). The persistent identifier is collected for the purpose of inferring the country / region of use (but not the exact location of the user). The Statistics collected are used by the Vuforia AR platform (PTC Inc.) in the following ways:

- to provide the Software and Services,
- to improve and optimize the Software and Services for different hardware and software requirements on various consumer devices (commonly referred to as device fragmentation),
- to facilitate the provision of new products, updates, enhancements, technologies, and other services,
- to improve the Software, the Services, and other products, services and technologies of PTC or its affiliates, and for any business purpose if de-identified and/or anonymized.

## **Consent**

Your use of the Company's Product and website implies consent with this Privacy Policy.

## **Contact Information:**

info@cosmoscontinuum.com  
www.cosmoscontinuum.com.