

Ruse AI Privacy Policy

Last update : January 27th 2022

This policy describes how Ruse IA Inc. ("**we**") collects, processes, uses and shares personal information and personal data about visitors to the Ruse IA website (the "**Website**") and users of the Ruse AI poker training service available as a web application and/or mobile application (the "**Service**"). The use of the second person ("**you**", "**your**", "**yours**") refers to a visitor to the Website or a user of the Service depending on the context.

In this policy, the term personal data refers to information about an identifiable individual.

The contact details of the personal data controller under this policy are as follows:

Privacy Officer

Ruse IA Inc.
203-3625 av. Ridgewood
Montréal QC H3V 1B4
Canada
privacy@ruse.ai

1. In summary

- We need to process personal data in order to be able to provide you with services, receive payments and fulfill our obligations to you.
- We anonymize certain data related to the use of the Service to create anonymous statistics and datasets. We use this anonymized data to improve our algorithms.
- We process personal data in order to improve the quality of the Website and the Service, learn about the browsing habits of our visitors and users, organize targeted advertising campaigns based on Website traffic, and provide personalized services to our users.

2. Basis for Processing

Our processing of data collected through the Service is based on a contractual relationship with respect to the data you provide directly to us and our legitimate interests in anonymously processing certain usage data.

Our processing of data collected through the Website is primarily based on our legitimate interests, including our interest in conducting personalized marketing. Some specific processing is based on the consent of visitors.

3. Data collected through the Service

3.1. User Information

We collect the following data about users of the Service:

Data category	Purpose of use
Name, first name, email and password	User identification and authentication.
Billing Address, Payment Information	Invoicing Payment processing
The content of communications transmitted by users	Respond to your requests.
Game Data, including cards, bets, decisions, strategies, gains, losses. Data generated by the Service regarding certain game situations, including the categorization of certain decisions.	Allow you to use the Service and view data associated with your profile. Create anonymized data sets for the improvement of the Service.
Analytics data which may include : <ul style="list-style-type: none">▪ The operating system of your device;▪ The language of your device;▪ The IP address from which your device accesses the Service;▪ Browsing and clickthrough data such as the number of connections to the Service, the duration of a session, the date of connections to the Service, the functions used;▪ Web page from which you accessed the Service;	Analytics data is collected through the Google Analytics service for the purpose of improving the Service.

4. Data collected through the Website

4.1. Information collected from you

We collect the information that you communicate to us (for example, by filling out a form) through the Website interface or otherwise. This information may include the data described below:

- Name;
- Email Address;
- Content of your messages;

4.2. Data Collected Automatically Through the Web Site

We collect information automatically during your use of the Website. This information is recorded each time you interact with the Website. Data collected includes certain information specific to your device and data about your interaction with the Website, including the data described below:

- The operating system and language of a device;
- The IP address from which a device accesses the Website;
- The country, state, city and postal code where the device is located;
- Navigation data, such as pages viewed, number of connections to the Website, duration of a session, date of connections to the Website, products viewed, page from which access to the Website is obtained;

This data is used to personalize your website experience (for example setting the language of the home page), to detect abuse and for advertisement retargeting.

4.3. Data from analysis tools

When you access the Website, we collect data from analytics tools such as Google Analytics. This data may include, for example, gender, age, interests. This data is not associated with you personally and is transmitted to us in aggregate form. You can deactivate Google Analytics on your browser through an add-on available at this address: <https://tools.google.com/dlpage/gaoptout>.

4.4. Data from social networks

We collect information from social networking sites or applications (Facebook, LinkedIn, Twitter, YouTube, Google+, etc.) when you interact with profiles that we operate on these social networking sites or applications. These sites or applications are also governed by their own policies relating to your personal data, which may differ from ours and may be applicable.

4.5. Tracking Technology

We use browser cookies and other tracking technologies such as invisible pixels to improve the performance of the Website and the Service, to personalize your experience on the Website, and to deliver advertisements to targeted audiences (based on Website traffic only). You can control the storage of browser cookies and some tracking technologies from your browser. Some tracking

technologies are provided by our suppliers, and our suppliers may be able to combine some of the data collected through cookies with other data they hold about you.

Depending on the geographic location from which you access the Website, your express consent may be required before tracking technologies are employed with respect to you.

5. How is your data used?

We use the personal data collected through the Website and the Service for the purposes described below.

5.1. Communication with you

We use the personal data you provide to us (such as your name and email address) to communicate with you about your use of the Service and to send you communications about our company, products and promotions, but only if you agree to receive marketing communications from us. We comply with all applicable regulations regarding unsolicited emails. If you no longer wish to receive electronic communications from us, you may notify us at any time by writing to us at privacy@ruse.ai.

5.2. Operation of the Service

We use the personal data collected through the Service to identify users and allow you to view your game data and to provide a personalized service to users (for example, a certain decision in a poker hand will result in a tip from the virtual coach). Personal data collected through the Service does not result in any decisions about users outside the Service.

5.3. Improvement to the Service

We anonymize some of the data collected through the Service and use it to improve the Service, including by building datasets for training machine learning algorithms.

5.4. Personalization of our services and Website

We use the data collected during your connection to the Website to offer you content that corresponds to your situation or interests. For example, the home page of the Website may be displayed according to your language preferences and the products and services displayed may be different depending on your geographic location.

5.5. Maintenance and Security

We use the data collected through the Website and the Service and data from analytics tools to monitor users' use of the Website and the Service generally, to prevent misuse of the Website or the Service, to identify problems or bugs with the Website or the Service, and to determine what features need to be improved. We may use certain data collected automatically to ensure the security of the Website, the Service and our computer systems, for example to prevent misuse or to prevent or deter fraud.

5.6. Personalized marketing and retargeting

We use the data collected through the Website to customize our advertising campaigns based on certain data collected, such as your subscription to our newsletter, your interest in our products and services, and navigational data, such as the pages you visited or the products you searched for or

viewed on the Website. This data allows us to target audiences to partners offering advertising services. Data collected through the Service, including game data, is not used for this purpose.

5.7. Targeted products and services

We may use the personal data collected through the Service to offer you additional products and services tailored to your situation. These offers come exclusively from us or from companies in our group that are bound by this policy. We never share your game data without your express consent.

6. How is your data stored?

We retain collected personal data until you request that we destroy it, or until our business no longer requires us to retain it. We do not, however, make a commitment to keep personal data for a specific period of time.

Personal data collected through the Service (such as user identity and game data) is stored electronically by our service providers on servers located in the State of Virginia in the United States.

Certain data relating to the use of the Service and the Website, email automation, support requests and payments are processed by our service providers through facilities that may be located in jurisdictions other than Canada.

Data generated from Google Analytics is stored on servers controlled by Google.

7. How is your data protected?

Your personal data is hosted on servers operated by our service providers and is protected by security measures proportionate with the sensitivity of the data against unauthorized access. Your financial data is subject to security measures that comply with the standards established by payment card networks.

Our employees and suppliers are informed of the confidential nature of personal data collected through the Website and the Service and are made aware of the appropriate security measures to prevent unauthorized access to personal data.

8. How is your data disclosed ?

We only share your personal data in the manner described in this policy and when we have obtained your consent. Your personal data may be disclosed to the categories of persons described below for the following purposes.

8.1. Employees

Personal data is accessible to our officers and employees who must have access to it in order to use the same as set forth in this policy.

8.2. Service Providers

We share personal data with service providers that allow us to provide our services more efficiently. We obtain confidentiality undertakings from these service providers with respect to the personal data provided to them. Our suppliers include the businesses listed below:

Supplier	Details	Useful links
Google, LLC	<p>We use the services of Google Analytics on the Website and on the Service. We use Google's services in order to analyze usage of the Service and the Website and to personalize our advertising campaigns according to Website traffic.</p> <p>Google Analytics obtains information about the behavior of visitors to the Website and users of the Service, including through "cookies" which allow Google to collect information about certain events such as the pages you visit, the length of a session or the products you view.</p> <p>The data processed by Google Analytics through the Website allows us to personalize advertising campaigns on the Google advertising network according to these behaviors.</p>	<p>Google Privacy Policy : https://policies.google.com/privacy?hl=fr</p> <p>Google's use of data from third-party sites : www.google.com/policies/privacy/partners/</p> <p>Deactivation tool: https://tools.google.com/dlpage/gaoptout</p>
Recurvyve Solutions Inc.	<p>We use the services of Recurvyve Solutions to help us with software development. Personal data may be shared if absolutely necessary to solve problems.</p> <p>Recurvyve Solutions is committed to maintaining the confidentiality of personal data and using it only to provide services to us.</p>	
Intuit (QuickBooks)	<p>We use the services of Quickbooks to process your payments.</p>	https://www.intuit.com/privacy/

Amazon Web Services (AWS)	<p>The Service and data associated with the Service (including personal data) are hosted by AWS.</p> <p>AWS is committed to maintaining the confidentiality of personal data and using it only to provide services to us.</p>	<p>AWS Customer Agreement (see section 3)</p> <p>https://aws.amazon.com/agreement/</p>
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8.3. Legal obligations

We may also disclose personal data to third parties if expressly permitted or required to do so by law, or if we are compelled to do so by a competent authority. We may disclose personal data in connection with legal proceedings if necessary to protect our rights or those of our users.

8.4. Transfer of business

In the event that the sale or restructuring of all or part of our business is contemplated, we may disclose personal data to the persons or organizations involved before and after the transaction, whether or not the transaction actually takes place. In such a case, these persons or organizations commit to us to maintain the confidentiality of personal data so disclosed and to use the same exclusively for the purpose of evaluating the feasibility of the transaction and in accordance with this policy.

9. What are your rights regarding your personal data?

9.1. Access your data

If you would like to access personal data we hold about you or have inaccurate personal data modified in our files, you may make a written request at privacy@ruse.ai.

We will respond to your request promptly (within 30 days of receipt). If required by law, we will provide your data in a machine-readable structured format.

9.2. Withdrawal of Consent

Your browser allows you to withdraw your consent to certain processing of your personal data, in particular by preventing the recording of browser cookies.

If you wish to withdraw your consent to the processing of your personal data beyond what is permitted by the Website or your browser, please notify us by writing to us at privacy@ruse.ai. Using the Website or the Service entails some processing of your personal data. The only way to stop all processing of your personal data is to stop using the Website and the Service.

9.3. Deletion

You may in certain circumstances request the deletion of personal data that we hold about you when its collection was not authorized. To make such a request, please write to us at privacy@ruse.ai. We will respond to your request as soon as possible (no later than 30 days after receipt).

If you continue to use the Website or the Service, we will again collect certain personal data about you.

9.4. Opposition

Under certain circumstances, you have the right to object to the processing of your personal data by us based on legitimate interests. Your rights in this regard depend, among other things, on your place of residence. To object to the processing of your data, you can write to us at privacy@ruse.ai.

9.5. Complaint

Depending on your place of residence, you may have the right to lodge a complaint about our personal data processing practices with the privacy authorities in your jurisdiction.

Our business is governed by the laws and regulations applicable in Quebec and Canada and is primarily subject to the jurisdiction of the Quebec and Canadian privacy authorities. Any complaint or claim based on this policy or on our processing of your personal data should be addressed to the Quebec or Canadian authorities.

9.6. Identity validation

We may verify the identity of individuals asking to exercise their rights with respect to their personal data. Any information collected to perform this verification will not be used for any other purpose.

10. Modifications

We may modify this Policy from time to time to reflect changes in our personal data processing practices. If a modification is made, the new policy will be available through the Service and on the Website at the following address www.ruse.ai/privacy

If we have collected your contact information, we will notify you of any material changes to our privacy policy by email before the new policy takes effect. If you do not accept the changes to your policy, you will have an opportunity to stop using the Service and the Website.

11. Additional Information

For any additional information with respect to our processing of personal data, you may contact us at the address indicated at the beginning of this policy.