

PRIVACY POLICY

Last updated: January 14, 2025

- 1. Introduction.** This Privacy Policy (**Policy**) explains how the personal data (including the personal data we collect and process through our services providers referred to below) of individuals (**you, your**) are handled in connection with accessing and using the website, its subdomains and any services available at mira.tg (**Website**) and by accessing the Telegram Mini App MiraAI (**Mini App**). This Policy applies to the Website, Mini App and any use thereof, including the use of services and/or products made available on the Website, via Mini App, Newsletters you may subscribe from time to time, when you communicate with us directly through the interface of the Website, Mini App, or via email, or offline engagement (collectively, the **Services**). By accessing or otherwise using the Website, Mini App or Services, you agree to collection, processing, disclosure, and use of Personal Data as described herein and you agree to the <https://mira.tg/terms-of-use.pdf> which shall be read and construed together with this Policy.

The term **Personal Data** in this Policy refers to personally identifiable information you may provide when using the Website, the Mini App, the Services and/or in any other contact with us, and our representatives. If you are interested in how cookies are used and how to change your cookies choice, please refer to clause **Cookies and Automatically Collected Data**.

- 2. Categories of Personal Data Collected, Purposes of and Bases for the Processing.** When providing the Services to you, your certain Personal Data could be processed for the following purposes:

Purpose of processing	Personal Data	Legal grounds (basis)
Establishing and managing relationships with you, including managing your account	Identification data, business data, contact data	Evaluation and due diligence prior to relationships establishing, our legitimate interest, meeting our legal and regulatory obligations, contractual obligations
Providing you with access to the Website, Mini App and/or Services	Identification data, business data, contact data, your Inputs and Outputs, any content you upload to our and/or our business partners' servers (except for cases when you use Decentralized Services referred to below), usage data, cookies	Evaluation and due diligence prior to relationships establishing, our legitimate interest, meeting our legal and regulatory obligations, contractual obligations (such as processing your Inputs and providing you with Outputs)
Sending email newsletters or newsletters by other means, communicating with you concerning your enquiries, sending you the information about our and/or our business partners' Services and products	Email address or another address required to send newsletters and communications	Your consent, contractual obligations

Developing, maintaining, providing, improving and ensuring safety of our Services	Identification data, business data, contact data, any content you upload to our and/or our business partners' servers (except for cases when you use Decentralized Services referred to below)	Evaluation and due diligence prior to relationships establishing, our legitimate interest, meeting our legal and regulatory obligations, contractual obligations
To administer and protect the Website, Mini App, the Services, intellectual property and any kind of licensed assets (including troubleshooting, testing, system maintenance, support, reporting and hosting of data)	Identification data, contact data, technical data	Our legitimate interest, your consent, contractual obligations
To use data analytics to improve or develop the Website, Mini App, the Services, intellectual property and any kind of licensed assets, User relationships and experiences	Technical data, usage data	Our legitimate interest, meeting our legal and regulatory obligations, contractual obligations

The data collected or otherwise obtained may include identification data (such as your name, date of birth, residency address and other identification data), contact data (such as your email, telephone number, Telegram account name and other addresses/means of communications), technical and usage data (such as details of your actions through the Website, Mini App and/or Services), marketing and communication data (such as your preferences in receiving marketing and other communications). Your Personal Data are collected directly from you or from other parties you have authorised to do such collection. There is no process for special categories of Personal Data about you unless you voluntarily provide such data.

By using the Website, Mini App and/or Services, there may be collection and/or processing of data that is not personal and relates to non-personal information. Such data is collected and processed to improve your user experience.

Please note that we do not process your payment information. When you purchase Telegram Stars, your Personal Data will be collected by third-party services providers and in accordance with their privacy policies.

Depending on the type of the Services (Custom Services, Third-Party Services, Decentralized Services (as defined in our Terms of Use) provided to you, we may process different types and volumes of your Personal Data. When you use the Services and include your Personal Data in your Inputs, such Personal Data may be processed automatically and for the purposes to provide you with an Output.

When you interact with Custom Services and/or Third-Party Services and include any Personal Data in your Input (as defined in our Terms of Use) we may use your Personal Data included in Inputs and Outputs to provide you with the Services. We can also use other content (including Inputs and Outputs) in de-identified manner after all your Personal Data has been automatically deleted therefrom to develop, maintain, improve the quality of and ensure the safety of our Services. When you interact with Decentralized Services, we do not use Personal Data you provide us with during the interaction with the Decentralized Services for the purposes of developing, maintaining, improving the quality of and ensuring the safety of our Services.

We do not use your personal data to train, develop, improve, operate or maintain our Services. If we use your Content to improve model performance, we will do so only in de-identified form and in accordance with applicable law. We will maintain and use De-Identified Data in de-identified form and not attempt to reidentify the information, unless required by law.

We do not control, and are not responsible for, third parties handling of your Inputs or Outputs, including for use in their model training.

We do not sell your Personal Data and do not share it with any third parties for cross-contextual behavioral advertising, and we do not process Personal Data for targeted advertising purposes.

3. **Personal Data Storage Period or Criteria for Such Storage.** Your Personal Data will be stored till:

- it is necessary to render you the Services;
- your consent is no longer valid;
- your Personal Data have been deleted following your data deletion request;
- in other circumstances prescribed by applicable laws.

In any event, your Personal Data will not be stored for periods longer than it is necessary for the purposes of the processing.

4. **Your Rights in Connection with Your Personal Data Processing.** While accessing, browsing the Website, Mini App and using the Services, you shall be entitled to exercise certain rights as set forth in applicable regulations, including GDPR and similar regulatory regimes, however it shall be noted that the exercise of some of those rights may not be possible in relation to the Website, Mini App and/or Services taking into account of their nature, manner, form and other applicable circumstances. You shall have the right to lodge a complaint with a competent data protection supervisory authority.

- **Right to Know:** you have right to know what your Personal Data we process;
- **Right to Access:** you may request a copy of all Personal Data you have shared with us via email provided below;
- **Right to Rectification:** you may ask us to update your Personal Data or correct the incorrect Personal Data. The exercise of the given right directly depends on the data category concerned: if it concerns online identifiers, then their rectification isn't possible, but such categories of Personal Data as email address may be rectified by sending a request via email;
- **Right to Erasure (Right to be Forgotten):** Personal Data could be deleted by a request via email;
- **Right to Object/Restrict Processing:** you may request that we do not process certain Personal Data you do not wish us to process. We will stop the processing unless such processing is required by virtue of law;
- **Consent Withdrawal Right:** you shall be entitled to withdraw consent to the processing of Personal Data to which you provided your consent. In particular, you can change your cookie choices by using cookie consent tool built in the Website or Mini App. You can exercise your right to withdraw consent by unsubscribing from the Newsletter;
- **Automated Decision-Making, Profiling:** neither is being carried out, your consent will be sought before carrying out any such activities.

To exercise any of the above rights, please contact us by emailing at legal@mera.tg.

Services may generate responses by reading your Input and, in response, predicting the words most likely to appear next. In some cases, the words most likely to appear next may not be the most factually accurate. For this reason, you should not rely on the factual accuracy of Output you receive from us. If you notice that the Output contains factually inaccurate information about you and you would like to request a correction or removal of the information, you can submit these requests through the email specified above.

5. **Marketing and Informational Communications.** You may subscribe to marketing and/or informational communications (**Newsletters**) using the Website, Mini App, Services or by other means made available to you by providing your explicit opt-in consent to receive Newsletters. You may withdraw your consent to marketing communications at any time by following the opt-out or “unsubscribe” links in the Newsletters or by emailing at legal@mira.tg.
6. **Cookies and Automatically Collected Data.** When you navigate through and interact with the Website, Mini App and Services, you may be asked to consent to use cookies, which are small files placed on the hard drive of your computer or mobile device, and web beacons, which are small electronic files located on pages of the website, to collect certain information about your equipment, browsing actions, and patterns.

The data is automatically collected from cookies, web beacons, local storages may include information from your web browser (such as browser type and browser language) and details of your visits to website, including traffic data and logs, page views, length of visit and website navigation paths as well as information about your device and internet connection, including how you interact with the Services. This data is collected in order to improve the Website, Mini App and Services. The information is collected automatically and may also include statistical and performance information arising from your use of Services, Website and/or Mini App. This type of data will only be used in an aggregated and anonymized manner.

7. **Transfer and Disclosure of Your Personal Data.** For the purposes of allowing your access to the Website, Mini App and rendering, developing, maintaining, ensuring safety of the Services, your Personal Data may be shared with certain categories of recipients and under certain circumstances:
 - **Service Providers and Advertising Partners:** providers, consultants, advisors, vendors and partners acting as data processors, which may supply Third-Party Services, hosting services, web analytics services, technology and support services, legal services, financial services, email marketing, automation services and other similar services. All such providers and partners shall have data processing agreements in accordance with the applicable laws and regulations to protect and secure Personal Data by using appropriate technical and organizational measures;
 - **Subsidiaries and Affiliates:** Personal Data may be shared with parent, subsidiary, joint venture partners and other affiliates under the common control subject to this Policy;
 - **Authorities:** in strict compliance with applicable laws and regulations, Personal Data may be shared with governmental authorities upon their decision, receipt of court orders mandating to disclose the Personal Data. In any such case, it will be strived to disclose only a portion of Personal Data which is definitely required to be disclosed, while continuing to be treated the rest of the data in confidence.
 - **Any other persons and/or entities** based on your consent.
8. **Security and Other Measures.** Your Personal Data is protected from loss, misuse or unauthorised access by maintaining administrative, technical, and physical security measures. Please, however, keep in mind that no security system is flawless or impenetrable, and no means of data transfer can be guaranteed to be free of interception or other types of misuse. Any information disclosed online is subject to interception and exploitation by unwanted parties. As a result, there is no guarantee of the complete confidentiality of any Personal Data you provide.
9. **Third-Party Links, Websites and Services.** Some technologies integrated into the Website, Mini App and/or Services (including Third-Party Services and Decentralized Services) are operated or controlled by third parties. For example, the Services may include links that

hyperlink to websites, platforms, and other services operated or controlled by a third party and/or transfer your Input to and receive your Output from third-party services providers.

Please note that when you interact with these other parties, including when you leave the Website, Mini App or Services, those parties may independently collect information about you and solicit information from you. You can learn more about how those parties collect and use your data by consulting their privacy policies and other terms. We are not responsible for the privacy practices of such websites, applications, interfaces, services and platforms operated by third parties that are linked to, rely on and/or integrated with the Website, Mini App or Services or for the privacy practices of third-party advertising companies.

10. International Transfer

We use service providers that may process personal data outside the European Economic Area (the "EEA"), the United Kingdom, and Switzerland, including in the United States.

Where the GDPR/UK GDPR applies, and where we transfer personal data to countries that do not provide an adequacy level of protection, we rely on appropriate safeguards, which may include:

- the European Commission's Standard Contractual Clauses (SCCs);
- the UK International Data Transfer Addendum to the SCCs (where relevant); and/or
- other valid transfer mechanisms recognized under applicable data protection laws.

We also implement appropriate technical and organizational measures designed to protect personal data, such as data minimization, access controls, and, where appropriate, encryption.

11. **Contacts and Requests.** Please send all your requests and queries in connection with your rights relating to the Personal Data protection and processing as part of providing the Website, Mini App and rendering the Services to you to: legal@mira.tg.
12. **Privacy of Minors.** Neither the Website nor Services are meant to be used by anyone under the age of 18. No Personal Data is being knowingly collected from children under 18 years old, unless expressly permitted by their parent or guardian.
13. **Governing Law and Dispute Resolutions.** Any dispute, controversy, or claim arising out of or in connection with this Policy, or the breach, termination or invalidity thereof, shall be governed by the laws and venue as stated in the Terms of Use.
14. **Changes to the Policy.** This Policy may be subject to reviews and changes from time to time. If substantial changes are made to the Policy, you will be notified about such material changes by updating this Policy. All such changes are represented by the "Last updated:" date. You are encouraged to check back and review this Policy from time to time so you will always be informed of what information is being collected, how it is used, and to whom it is being disclosed.