Privacy Notice

Last reviewed: *October 2026*

Introduction

Aylo (hereinafter **"we"**, **"us"** or **"our"**) operates the website https://aylo.com (hereinafter the **"Website"**) and is the controller of the information collected or provided to us during the use of our Website. This means that we are responsible for deciding how we collect, store or use your Personal Information. Personal Information, also referred to as personal data, means any information about an individual by which that individual can be identified ("**Personal Information**"). This Privacy Notice intends to inform you about the processing of your Personal Information by us for the purposes mentioned below.

Please, read this Privacy Notice carefully, as your visit, access to, and use of our Website signifies that you have read, understand and agree to all terms within this Privacy Notice. If you do not agree with any part of this Privacy Notice or our Terms of Use, please do not access or continue to use our Website.

This Privacy Notice does not apply to information collected by:

- us offline or through any means, including on any other website operated by us or any third party (including our affiliates and subsidiaries).
- information we collect from job applicants on this Website through our "Career" page. In this case, the Candidate Privacy Notice will apply;
- any third party (including our affiliates and subsidiaries), including through any application (including social media icon) that may link to or be accessible from or on the Website. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites, and we are not responsible for their privacy statements.

This Privacy Notice applies to information collected:

- on our Website; and
- on your communications with us via email, or otherwise.

If you have any questions about our privacy practices, please see here how to contact us.

Scope

For the purposes of this Privacy Notice, "process", "processed" or "processing" means any operation or set of operations performed on personal data or on sets of personal data (excluding disclosure thereof), including one or several of the following operations:

collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, alignment or combination, restriction, erasure, or destruction.

The Personal Information We Process About You

We may process the following kinds of Personal Information about you:

- **Communication Data:** We process contact data and other information that you send to us via email, information provided in the context of support requests or any other inquiries.
- **Website activity data:** We process online identifiers such as cookies or internet protocol (IP) address.

The Sources from Which We Collect Personal Information

We collect Personal Information in the following ways:

- **Directly from you:** We collect the categories of information listed above directly from you.
- **Automated technologies:** We set cookies to process website activity data, and we might also collect information such as IP addresses for the delivery of our webpage. Cookies are small text files that are stored in your web browser or downloaded to your device when you visit the Website. This Website uses only essential cookies.

Purposes for Which We Process Your Personal Information

We will only process your Personal Information in accordance with applicable laws and for the purposes described below:

- **Communications and handling of requests:** We process Communication Data and other information as necessary to respond to and resolve any of your requests, including where this is required to ensure compliance with our legal obligations.
- **Functionality and security:** We may process any of the categories of data described above to diagnose or fix technology problems, to detect, prevent, and respond to actual or potential fraud, illegal activities, or intellectual property infringement.

Our Legal Bases under Canadian and European Union (EU) Privacy Law

To the extent required by applicable laws, we process your Personal Information only where:

- **You provide your consent to do so for a specific purpose:** for example, when you allow us to send you e-mail(s) in response to your request. You may withdraw your consent at

any time. Withdrawing your consent will not affect the lawfulness of any collection, use, processing, or disclosure that occurred prior to the withdrawal.

- **It is necessary to fulfil our contractual obligations as per our Terms of Use**.
- **It is necessary to comply with legal obligations:** for example, we may be required to collect, use, or disclose your information in connection with civil, criminal, corporate, taxation, regulatory matters, or litigation
- **It satisfies a legitimate interest which is not overridden by your data protection interests:** for example, to keep our Website safe and secure from fraud and illegal activities.

Depending on the circumstances, we may rely on different legal bases when processing the above-mentioned information for different purposes. If you reside outside the European Economic Area ("EEA"), Switzerland or the United Kingdom ("UK"), the legal bases on which we rely may differ from those listed above.

Automated decision-making

You will not be subject to any decisions that will have a significant impact on you based solely on automated decision-making.

Disclosure of Your Personal Information

We disclose your Personal Information when necessary for the purposes set out in this Privacy Notice. When we disclose your Personal Information, we usually rely on our legal obligation to do so, our legitimate interest, so long as it doesn't outweigh your interests or your consent, except when expressly stated otherwise below in the paragraph "To comply with the law or protect our rights or the rights of third parties".

Disclosure of your Personal Information may also involve transfers of your Personal Information outside the EEA. To the extent that we need to transfer Personal Information outside the EEA, we will do so according to the section "Transfers of Your Personal Information to Other Countries". The parties to whom we may disclose your Personal Information include:

- **Our contractors and/or employees**: Our employees and/or contractors may receive access to your Personal Information only on a need-to-know basis. Such employees and contractors abide by confidentiality obligations.
- **Our corporate group**: We may disclose any of the categories of Personal Information that We collect to members of Our corporate group to the extent this is necessary for the purposes described in this Privacy Notice. You acknowledge that in some cases,

members of Our corporate group might be established or run their services outside the EEA.

- **Legal successors**: We may disclose all categories of Personal Information We process to a buyer or other successor in the event of a merger, acquisition or sale or transfer of some or all Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding. Such transactions may be in our legitimate interest, particularly our interest in making decisions that enable our business to develop.
- **To comply with the law or protect our rights or the rights of third parties**: We access, preserve and share Personal Information with regulators, public authorities, law enforcement, government agencies, out-of-court dispute settlement bodies or others where we reasonably believe such disclosure is needed to:
  a) comply with any applicable law, regulation, court order, legal process, government or public authority requests.
  b) detect, prevent, or otherwise address security or technical issues.
  c) where applicable, protect the rights, property, or safety of our company, our employees, and related third parties.
  d) maintain and protect the security and integrity of our infrastructure. In such cases, we may raise or waive any legal objection or right available to us, in our sole discretion.

  We may disclose your information to third parties for the above purposes where necessary to comply with our legal obligations, to perform a task in the public interest (where the public interest is laid down by applicable law), or under our legitimate interests and the interests of the public, including as part of investigations or regulatory enquiries to detect, investigate and prosecute illegal activity.

Transfers of Your Personal Information to Other Countries

We may share the information we collect globally, across our corporate group and other third parties. Transfers are necessary for a variety of reasons, including the purposes stated in this Privacy Notice.

Whenever we transfer Personal Information to countries outside the EEA and other regions with comprehensive data protection laws, we will ensure that the information is transferred in accordance with this Privacy Notice, as permitted by the applicable laws and based on appropriate mechanisms. Where applicable, we rely on decisions of the European

Commission, known as “adequacy decisions,” recognizing that certain countries offer a level of protection of Personal Information that is essentially equivalent to the EEA.

In other situations, we rely on standard contractual clauses approved by the European Commission (and the equivalent standard contractual clauses for the UK, where appropriate) or on derogations provided for under the applicable law to transfer information to a third country. For more information or to obtain a copy of our standard contractual clauses, please see the section “Contact Information” below on how to contact us.

Data security

We have put in place appropriate security measures to prevent your Personal Information from being accidentally lost, used, or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your Personal Information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your Personal Information based on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator in the event of a breach.

Retention of Personal Information

We will only retain your Personal Information for as long as necessary to fulfil the purposes we processed it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for Personal Information, we consider several factors, including what Personal Information we are processing, the risk of harm from any unauthorized disclosure, why we are processing your Personal Information and whether we can achieve this outcome by another means without having to process it.

Where we no longer need to process your Personal Information for the purposes set out in this Privacy Notice, we will delete it from our systems.

For more information on data retention periods, please see the section “Contact Information” below on how to contact us. Where permissible, we will also delete your personal information upon your request as explained in the section “Your Rights Related to Your Personal Information”.

Your Rights Related to Your Personal Information

Subject to local law and applicable legal requirements and exemptions, you have certain rights regarding your Personal Information:

- **Right of access:** you have the right to receive information on the Personal Information we hold about you and how such Personal Information is used, as well as a copy of your Personal Information.
- **Right to rectification**: you have the right to rectify inaccurate Personal Information concerning you.
- **Right to be forgotten:** you have the right to delete/erase your Personal Information**.**
- **Right to data portability**: you have the right to receive the Personal Information provided by you in a structured, commonly used, and machine-readable format and to transmit this personal data to another data controller.
- **Right to object:** you have the right to object to the use of your Personal Information where such use is based on our legitimate interests or on public interests.
- **Right to restriction of processing:** you have the right in some cases, to restrict our use of your Personal Information.
- **Right to file a complaint:** If you are in the EEA or the UK, you also have a right to file a complaint with your local data protection authority.
- If we ask for your consent to process your Personal Information, you have the right to withdraw your consent at any time with effect for the future.

You can exercise your above rights by contacting us at privacy@aylo.com.

Please note that we have one month to respond to your request. Prior to processing your request, we will need to verify your identity. This is an appropriate and reasonable security measure to ensure that Personal Information is not disclosed to any person who has no right to receive it or deleted in an unauthorized way.

California Rights and Choices

The California Consumer Privacy Act of 2018 (“CCPA”), as amended by the California Privacy Rights Act of 2020 ('CPRA'), provides California residents (“Consumer(s)”) certain rights with respect to their Personal Information, as this term is also defined under the CCPA. In addition to the rights that we state under this Privacy Notice, and subject to the exceptions found under the CCPA, such Consumers have the right to:

- Opt-out of the sale of their Personal Information, should we sell their Personal Information.
- Be informed of certain information concerning our collection and use of their Personal Information.
- Request that we delete certain Personal Information we collected from them.
- Appoint an agent to exercise their rights provided for by the CCPA, provided that a duly executed notarized power of attorney is presented and provided that the agent has information deemed sufficient to allow us to verify the identity of the Consumer in question and to locate his/her information in our systems.
- Not be subjected to discrimination for the exercise of these rights. We will not deny California residents the use of our service, neither will we provide a different level or quality or services for exercising any of their CCPA rights, unless as permitted under the CCPA.

Changes to Our Privacy Notice

We may modify or revise our Privacy Notice from time to time. You are expected to periodically review the most up-to-date version of our Privacy Notice, which will be posted at our Website, so you are aware of any changes. If we change anything in our Privacy Notice, the date of change will be reflected in the “last modified date”.

Enforcement; Cooperation

We regularly review our compliance with this Privacy Notice. Please feel free to direct any questions or concerns regarding this Privacy Notice by contacting us through this Website at privacy@aylo.com. When we receive a formal written complaint, we will contact the complaining party regarding their concerns. We will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding this Privacy Notice.

Notice to Law Enforcement

The following information serves as a guideline for law enforcement officials seeking disclosure of records. You may serve us a valid Court Order, Subpoena, Search Warrant or equivalent Legal or Official Administrative Document by respecting the following conditions:

- The document(s) is uploaded, and all required fields have been filed out adequately on our Legal Service Process Platform located at: https://legalservice.aylo.com/legal/datarequest
- The document(s) you are serving is correctly issued by a valid Court of Law or equivalent legal or administrative authority to the right operating entity for the website in question. (See the Contact page to find the operating entity).
- The document(s) is also sent by mail at the following address: 195-197 Old Nicosia - Limassol Road, Block 1 Dali Industrial Zone, Cyprus 2540.

We reserve the right to refuse online service through any other means not provided on our contact page, namely in cases where the above requirements are not met and require formal legal service at the above address. In such event, you will be notified. We may raise or waive any legal objection or right available, in our sole discretion.

No Rights of Third Parties

This Privacy Notice does not create rights enforceable by third parties.

No Error Free Performance Content

We do not guarantee error-free content under this Privacy Notice. We will use reasonable efforts to comply with this Privacy Notice and will take prompt corrective action when we learn of any failure to comply with our Privacy Notice. We shall not be liable for any incidental, consequential or punitive damages relating to this Privacy Notice.

Contact Information

If you have any questions about this Privacy Notice, please contact us at privacy@aylo.com.