AxiOne Privacy Policy

Last Updated: May 23, 2025

This Privacy Policy ("Policy") outlines how Nidelor Ltd, operating as AxiOne ("AxiOne," "we," "us," or "our") collects, uses, and discloses personal information obtained through our website at https://axione.ai and our Al-powered game development platform (collectively, the "Services").

By using our Services, you agree to the terms of this Policy. This Policy should be read together with our Terms and Conditions.

We are committed to protecting your privacy and complying with applicable data protection laws, including the General Data Protection Regulation (GDPR) where applicable.

For questions about this Privacy Policy, contact us at: privacy@axione.ai

1. DATA CONTROLLER

Nidelor Ltd is the data controller for personal data collected through our Services. We may act as a data processor on behalf of our customers for certain data processed through our platform.

Nidelor Ltd

Registered in Cyprus

Email: privacy@axione.ai

2. INFORMATION WE COLLECT

2.1 Information You Provide to Us

Account Information:

- Name and email address
- Password (encrypted)
- Profile information
- Payment and billing information (credit card details, billing address)

Content and Communications:

- Game development projects and documentation
- Prompts and inputs provided to Al Assistants
- Messages and communications with our support team
- Feedback and survey responses

Professional Information:

- Company name and role (if applicable)
- Game development experience level
- Project details and game concepts

2.2 Information We Collect Automatically

Usage Data:

- How you interact with our Al Assistants
- Features used and time spent in the platform
- · Credit usage and subscription activity
- Generated content metadata (not the content itself)

Technical Information:

- IP address and general location (city/country level)
- Device type, browser, and operating system
- · Session duration and navigation patterns
- Error logs and performance data

Cookies and Similar Technologies:

- Session cookies for platform functionality
- Analytics cookies to understand usage patterns
- Preference cookies to remember your settings

2.3 Al-Generated Content

We distinguish between:

- Your Prompts: Inputs you provide to our Al Assistants
- Generated Assets: Content created by our Al based on your prompts
- Usage Patterns: How you interact with AI features (anonymized)

3. HOW WE USE YOUR INFORMATION

We use your information for the following purposes:

3.1 Service Provision

- Providing access to the AxiOne platform and Al Assistants
- · Processing your game development projects
- Managing your account and subscription

· Processing payments and billing

3.2 Service Improvement

- · Analyzing usage patterns to improve our AI models
- · Developing new features and capabilities
- · Identifying and fixing technical issues
- Conducting research and development

3.3 Communication

- Responding to your inquiries and support requests
- Sending important service notifications
- Providing educational content and tips (with consent)
- Marketing communications (with consent, where required)

3.4 Legal and Security

- Preventing fraud and abuse
- · Complying with legal obligations
- · Protecting our rights and interests
- Ensuring platform security

Legal Basis (GDPR):

- Contract performance (providing Services)
- Legitimate interests (service improvement, security)
- Consent (marketing communications)
- Legal compliance (regulatory requirements)

4. AI MODEL TRAINING AND IMPROVEMENT

Important: We use your textual prompts to improve our Al Assistants, but we handle your Generated Assets differently:

- Prompts: May be used (in anonymized form) to improve Al responses
- **Generated Assets:** Only used to train your custom models (if applicable)
- Publicly Shared Content: Content you choose to make public may be used for general improvements
- Private Projects: Remain private and are not used for general training

You can opt out of Al improvement programs by contacting <u>privacy@axione.ai</u>.

5. INFORMATION SHARING AND DISCLOSURE

We share your information only in the following circumstances:

5.1 Service Providers

We work with trusted third-party providers for:

- Cloud Infrastructure: AWS, Google Cloud (data hosting and processing)
- Payment Processing: Stripe, PayPal (payment transactions)
- Analytics: Google Analytics, Mixpanel (usage analysis)
- **Communication:** Email service providers (notifications)
- Al Models: OpenAl, Anthropic, Google (Al processing)

All service providers are contractually required to protect your data and use it only for specified purposes.

5.2 Business Transfers

If AxiOne is involved in a merger, acquisition, or sale of assets, your information may be transferred as part of that transaction.

5.3 Legal Requirements

We may disclose information when required by law or to:

- Comply with legal process or government requests
- Prevent fraud or security threats
- · Protect our rights and property
- Respond to emergencies involving safety

5.4 Aggregated Data

We may share anonymized, aggregated statistics about platform usage that cannot identify individual users.

6. DATA RETENTION

We retain your information for different periods depending on the type:

- Account Information: Until account deletion plus legal retention period
- Usage Data: 3 years for analytics, longer if required by law
- Generated Assets: Until you delete them or close your account
- Support Communications: 3 years after resolution

Payment Information: As required by financial regulations

You can request deletion of your data at any time, subject to legal retention requirements.

7. YOUR PRIVACY RIGHTS

Under GDPR and other applicable laws, you have the following rights:

7.1 Access and Information

- Know what personal data we have about you
- Receive a copy of your data in portable format
- Understand how we use your information

7.2 Correction and Updates

- Correct inaccurate information
- Update your account details
- Modify communication preferences

7.3 Deletion and Erasure

- Delete your account and associated data
- Request removal of specific information
- Exercise "right to be forgotten" (where applicable)

7.4 Control and Restriction

- Opt out of marketing communications
- Restrict certain data processing activities
- Object to processing based on legitimate interests

7.5 Portability

- Export your Generated Assets
- Receive your data in machine-readable format
- Transfer data to other services

To exercise these rights, contact us at: privacy@axione.ai

We will respond within 30 days (or as required by local law). For account deletion, you may also use the self-service option in your account settings.

8. DATA SECURITY

We implement comprehensive security measures to protect your information:

8.1 Technical Safeguards

- Encryption in transit and at rest
- Secure authentication and access controls
- · Regular security monitoring and auditing
- Penetration testing and vulnerability assessments

8.2 Organizational Measures

- Staff training on data protection
- Limited access on need-to-know basis
- · Regular security policy reviews
- Incident response procedures

8.3 Infrastructure Security

- · Secure cloud hosting with enterprise-grade providers
- Regular backups and disaster recovery plans
- · Network security and firewalls
- Continuous monitoring for threats

However, no system is 100% secure. We cannot guarantee absolute security, and you should protect your account credentials.

9. INTERNATIONAL DATA TRANSFERS

AxiChat is based in Cyprus (EU). However, some of our service providers are located outside the EU:

- **US Providers:** We use Standard Contractual Clauses (SCCs) and ensure adequate protection
- Data Processing Agreements: All providers must meet EU data protection standards
- Adequacy Decisions: We prioritize providers in countries with adequacy decisions

By using our Services, you consent to these transfers under appropriate safeguards.

10. COOKIES AND TRACKING

10.1 Types of Cookies We Use

Essential Cookies: Required for platform functionality

- · Authentication and session management
- Security and fraud prevention
- Core platform features

Analytics Cookies: Help us understand usage patterns

- Google Analytics (anonymized)
- Platform usage statistics
- Performance monitoring

Preference Cookies: Remember your settings

- Language and region preferences
- Interface customizations
- Feature toggles

10.2 Cookie Management

You can control cookies through your browser settings. However, disabling essential cookies may affect platform functionality.

Cookie Consent: We obtain consent for non-essential cookies as required by law.

11. CHILDREN'S PRIVACY

Our Services are not intended for children under 13. We do not knowingly collect personal information from children under 13. If you believe we have collected such information, please contact us immediately at privacy@axione.ai.

For users aged 13-18, we require parental consent or supervision as outlined in our Terms and Conditions.

12. EXTERNAL LINKS AND INTEGRATIONS

Our platform may contain links to third-party websites or integrate with external services. This Privacy Policy does not apply to those third parties. We encourage you to read their privacy policies before providing any information.

Third-Party AI Models: When you use external AI models through our platform, your prompts may be processed by those providers under their privacy policies.

13. DATA PROTECTION OFFICER

For GDPR-related inquiries, you can contact our Data Protection Officer at: dpo@axione.ai

14. CHANGES TO THIS POLICY

We may update this Privacy Policy periodically to reflect changes in our practices or applicable law. We will:

Post updated versions on our website

- Notify you of material changes via email
- Update the "Last Updated" date at the top

Continued use of our Services after changes constitutes acceptance of the updated Policy.

15. COMPLAINTS AND REGULATORY CONTACTS

If you have concerns about our data handling practices, you can:

- 1. Contact us directly: privacy@axione.ai
- 2. File a complaint with supervisory authorities:
 - Cyprus: Office of the Commissioner for Personal Data Protection
 - EU: Your local data protection authority
 - Other jurisdictions: Relevant privacy regulators

16. CONTACT INFORMATION

For privacy-related questions or requests:

- Email: privacy@axione.ai
- Subject Line: Please include "Privacy Request" or "GDPR Request"
- **Response Time:** We aim to respond within 5 business days

For general support:

• Email: support@axione.ai

Company Information:

• Name: Nidelor Ltd

• Jurisdiction: Republic of Cyprus

This Privacy Policy was last updated on May 23, 2025 and is effective immediately.