

Divinia, Inc.

B2B Privacy Notice

Divinia, Inc. ("us", "we", or "our") is committed to protecting the security and confidentiality of personal information of our clients.

1. Contact Information

For general privacy issues please email: info@divinia.ai

2. Categories of Personal Information

As a service vendor, Divinia, Inc. may be processing data, including personal information at the request of our customers. In this case, Divinia does not directly collect personal data from data subjects/individuals. The personal data we are collecting may include the following:

- First name and last name
- Email address
- IP address

The more detailed and accurate categories of personal data we process will depend on the actual contract and therefore it is casebycase. And such categories may be specified in our agreements with individual customers.

3. Use of Personal Information

Our purposes for using personal information include:

- Provide Service as Specified in the service agreement between the customer and us
- Analyze performance Metrics of our service and Improve our service
- Comply with Legal Obligations

4. Purpose of processing

The purpose of processing such data is to provide services. Divinia, Inc. processes data (which may include personal data) on behalf of our customer. Therefore the detailed purpose of processing is casespecific and defined by individual contracts.

5. How We Share Personal Information

Divinia, Inc. does not own personal information provided by the client, and does not sell such information to a third party.

As a data processor, Divinia, Inc. may hire subprocessor(s) to provide services such as computing infrastructure provisioning. The subprocessor has or potentially will have access to or process Service Data (which may contain Personal Data). Divinia, Inc. use a commercially reasonable selection process by which it evaluates the security, privacy and confidentiality practices of proposed subprocessor(s) that will or may have access to or process Service Data.

Divinia, Inc. will also properly configure services provided by such sub-processors to enhance security and authorized access of personal information.

For a complete list of current data processors, please see Section 7.

We may also be required to share personal information in response to subpoenas, court orders, or other legal processes; to establish or exercise our legal rights; to defend against legal claims; or as otherwise required by law.

6. Security of Personal Information Processed a. Network Security

We will make sure all the personal data is transferred to and from the customer, or between our own servers in encrypted form.

b. Computer Security and Reliability

We will make sure that the firewalls of our servers which contain personal data are properly configured, and kept updated with the latest security patches.

Personal data are also stored in disks and other storage systems in encrypted form. Divinia, Inc. will take actions to properly guard master keys corresponding to such encryptions.

c. Testing and reviews of security measures

Divinia, Inc. will perform regular reviews and testing of all security measures being implemented.

7. Subprocessors

The following is an up-to-date list (as of Jan 2021) of the names of subprocessor(s):

Amazon Web services Purpose: Hosting, Computation Location: United States

Website: <https://aws.amazon.com/>

8. Retention

Please see Divinia, Inc.'s Data Retention Policy.

9. Rights of Data Subjects

Divinia, Inc. respects rights of data subjects as defined in [GDPR](#) or other applicable laws including:

- Right of access by the data subject
- Right to rectification
- Right to erasure (“right to be forgotten”)
- Right to restriction of processing

Right to data portability

Right to object

If you're unable to exercise your rights as a citizen of applicable jurisdiction using the information above, please contact us by emailing info@divinia.ai . We respond to requests within 30 days. However, it may take longer to complete the request. We'll let you know these details over email.

Effective 01/2021