

Privacy Policy
Qrati Labs, LLC
Updated February 2026

Qrati is operated by Qrati Labs, LLC (“**We**”, “**Us**”), a Colorado limited liability company (the “**Company**”). The Company has prepared this privacy policy (the “**Privacy Policy**”) to describe to You, or if You represent an entity or other organization, that entity or organization (in either case, “**You**”) how we handle Your personal information.

The Company offers a platform where You can upload Your original media, which will then be presented and curated through a variety of means, including human input (the “**Platform**”). You may access the Platform through qrati.com (the “**Site**”) or using web-based platforms, mobile-optimized experiences, progressive web applications (PWAs), or other online interfaces by and on behalf of the Company (each, an “**Application**” or “**App**,” **whether or not a native application download is required**) and each Application and the Site treated as part of the “**Platform**” for purposes of this Privacy Policy). By using the Company’s Platform, You consent to the storage, processing, transfer, and disclosure of Your personal information as described in this Privacy Policy. We will note the effective date of the latest version of our Privacy Policy at the end of this Privacy Policy.

The Privacy Policy may be changed at any time without prior notice, and an effective date of the changes will be posted on the Site and/or Application, with all changes applying to all Site and/or Application users (past and present) and replacing all prior inconsistent policies. You will be subject to, and are deemed to have been made aware of and to have accepted, all changes to the Privacy Policy by Your continued access or use of the Site and Application after the date the changes are published on the Site/Application.

It is important that You read the Privacy Policy and all other privacy notices and fair processing notices that we may provide on specific occasions while we are collecting or processing personal data about You, so that You are fully aware of how and why we are using Your data. The Privacy Policy supplements those other notices and is not intended to override them. The Privacy Policy also includes provisions that are intended to comply with the California Consumer Protection Act (“CCPA”) and with the European Union’s General Data Protection Regulation (“GDPR”).

Controller and Processor Roles

For purposes of applicable data protection laws, Qrati Labs, LLC acts as a **data controller** with respect to personal data collected and processed for platform administration, security, analytics, product improvement, and business operations. In connection with certain events hosted, organized, or sponsored by third parties, Qrati Labs may act as a **data processor or service provider** on behalf of event organizers, municipalities, brands, or other partners, and processes personal data in accordance with their instructions and applicable agreements.

We have appointed a data privacy manager who is responsible for overseeing all questions with respect to the Privacy Policy. If You have any question about the Privacy Policy (including any request to exercise Your legal rights), please contact the data privacy manager using the contact details set out below.

Full name of legal entity: Qrati Labs, LLC
Name of data privacy manager: Andy Jacobs
Email: dataprivacy@qratilabs.com

Collection

You may browse the Platform without providing personal information about Yourself. However, to use the Platform to upload photos and to receive notifications about the Platform, the Company may collect the following information: name, e-mail address, phone number, and any personal photographs You provide to be curated and/or used as a profile picture. The Company may collect other information from Your interaction with the Platform, including billing and financial information, transaction data, profile data, computer and connection information, statistics on page views, traffic to and from the Site, ad data, IP address, aggregate data, demographic data, and standard web log information. If You choose to provide the Company with personal information, You consent to the transfer and storage of that information on the Company's servers.

In addition to personal information, the Company may collect other information from You using the following technologies:

- Cookies. "Cookies" are small bits of information that the Site places on the hard drive of Your computer. Cookies remember information about Your activities on the Site to make Your visits to the Site more enjoyable and valuable to You by providing a customized experience and recognizing Your preferences when You visit the Site. If You've chosen to disable cookies on Your browser, some of the functionality of the Site may be lost. Certain services provided by the Company, require that cookies be enabled on Your browser and cannot be used when You have disabled cookies in Your browser.
- Web Beacons. Web beacons are small graphic images on a web page or in an email that can be used for such things as recording the pages and advertisements that You select, or tracking the performance of email marketing campaigns.
- Social Networking Sites. If You log into Your user account through sign-in services, You provide us with permission to access certain information about You from that social networking site.
- Location. When You use the platform, the Company may collect and process information about Your actual location. The Company uses various technologies to determine location, including IP address and GPS.

Use

The Company may use the personal information You provide for various purposes, including without limitation, to communicate with You, register You as a user of our Site or Application, troubleshoot problems, customize Your experience and make recommendations, inform You about our services and policies such as our Terms of Use, measure interest in the Platform, process financial transactions, in connection with promotions, surveys, advertising, to detect, prevent and mitigate fraudulent or illegal activities, and to comply with our legal obligations.

Artificial Intelligence and Automated Processing.

The Company may use personal data and User Content in connection with automated systems, machine-learning models, and artificial intelligence tools to analyze, classify, curate, rank, summarize, and improve the Platform and related services. This may include extracting metadata, embeddings, or other derived data from content. Where possible, such processing is performed using de-identified, aggregated,

or anonymized data. Derived data and analytical outputs may be retained even if the original content or account is deleted, as permitted by applicable law.

Sharing

The Company does not sell or rent Your personal information for marketing purposes without Your explicit consent. The Company may share Your information with its affiliates, subsidiaries, and services providers that perform services for the Company, such as payment processors and financial institutions under contract who help with the Company's business operations. The Company may disclose personal information to respond to legal requirements, enforce its policies, respond to claims that a posting violates other's rights, or protect anyone's rights, property, or safety. In addition, if the Company sells all or part of its business or makes a sale or transfer of assets or are otherwise involved in a merger or business transfer, the Company may transfer Your personal information to a third-party as part of that transaction. All information will be disclosed in accordance with applicable laws and regulations.

If You are a resident of a country within the European Union, we will be transferring Your data outside the European Economic Area ("EEA"), as we are based in the United States; and, many (if not most) of the third-parties may be based outside the EEA, so their processing of Your personal data will also involve a transfer of data outside the EEA. In any event, whenever we transfer Your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by adhering to the applicable GDPR's guidelines; and, we will only transfer Your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. Please contact us if You want further information on the specific mechanism used by us when transferring Your personal data out of the EEA.

Event Organizers and Partners.

Content and limited personal data submitted through the Platform may be shared with applicable event organizers, sponsors, municipalities, partners, or their service providers for purposes related to event operation, content curation, analytics, promotion, or sponsorship activation. Such parties' use of personal data is governed by their own privacy practices, and Qrati Labs is not responsible for the privacy practices of third-party event organizers or partners.

California Privacy Rights.

Qrati Labs does not sell personal information as defined under the California Consumer Privacy Act, as amended by the California Privacy Rights Act ("CPRA"). Any sharing of personal information is conducted for business purposes, service provision, analytics, or other permitted purposes under applicable law.

Access & Choice

You may access or update the personal information You provided to use at any time through the account feature in the Application. You may also request that Your account be deleted at any time by contacting the Company at dataprivacy@qratilabs.com. You may also opt out of any geolocation features by changing the Application's settings on Your device.

Security

Your personal information is important and the Company uses a variety of reasonable and appropriate tools to protect it from unauthorized access. Even though the Company takes reasonable precautions to

protect Your data, the Company cannot guarantee that Your personal communications and other transmissions will not be intercepted by third-parties.

(a) Data Retention

We will only retain Your personal data for as long as may be necessary to fulfill the purposes for which we collected it for, which may include satisfying any legal, accounting, or reporting requirement. To determine the appropriate retention period for personal data, we may consider (i) the amount, nature, and sensitivity of the personal data, (ii) the potential risk of harm from unauthorized use or disclosure of the personal data, (iii) the purposes for which we process the personal data, (iv) whether we can achieve those purposes through other means, and (v) applicable legal requirements. In some circumstances, You may ask us to close Your account and delete Your data (please see “request erasure” section below).

In certain circumstances, we might anonymize Your personal data (so that it can no longer identify or otherwise be associated with You) for various research or statistical purposes, in which case we may use that information indefinitely without further notice to You. We reserve the right to share aggregated, anonymized, or de-identified data with any universities, researchers, and other third-parties and in various publications, all of which may be based upon any of the data submitted to the Site. Such data may be used for research, statistical analysis, platform improvement, or societal or behavioral impact studies and does not reasonably identify individual users.

In some circumstances, personal data may be retained in de-identified or aggregated form for analytics, research, security, or product improvement purposes, including the development and improvement of automated or AI-driven features, in accordance with applicable law.

(b) Your Legal Rights and Non-Discrimination Policy

Under certain circumstances, You have rights under various data protection laws and regulations with respect to Your personal data. If You wish to exercise any of the rights that are described in these Terms of Use or that otherwise may be available, please contact us at info@qratilabs.com. If You exercise any of Your rights, we will not discriminate against You by denying You goods or services, charging You different prices or rates for goods or services, or providing a different level or quality of goods or services. Please note that we may offer financial incentives to collect, sell, or erase Your personal information.

(c) No Fee Usually Required

You do not have to pay a fee to access Your personal data or to exercise any of Your rights; however, if Your request is clearly unfounded, repetitive, or excessive, then we may charge a reasonable fee or we may refuse to comply.

(d) What We May Need From You

We may need to request specific information from You to help us confirm Your identity and to ensure Your right to access Your personal data or to exercise any of Your rights, because we seek to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact You to ask You for further information with respect to Your request, to help expedite our response.

(e) Time Limit to Respond

We will respond to all legitimate requests for disclosure of Your personal information within 45 days; however, it could occasionally take us longer if Your request is particularly complex or if You have made a number of requests (in which case we will notify You and keep You updated). In the case of any alleged unauthorized acquisition of unencrypted personal information or noncompliance with the CCPA arising from our side, we reserve a time period of up to 30 days to cure any alleged violation before private legal action may be taken.

(f) Do Not Track

We do not respond to Do Not Track and related signals requesting us to stop the tracking of individual users on our websites. Please see www.allaboutdnt.com for more information.

Glossary

(a) Lawful Basis may include:

- i. “**Legitimate Interest**” means our various interests with respect to conducting and managing our business, to enable us to provide better products or services and to create a more engaging or secure experience. We consider and balance any potential impact on you (positive or negative) and your rights, before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted by applicable law or regulation). Please contact us to obtain further information about how we assess our legitimate interests against any potential impact on you with respect to specific activities.
- ii. “**Performance of a Contract**” means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into any contract.
- iii. “**Compliance with a legal obligation**” means processing your personal data where it is necessary for compliance with an applicable legal or regulatory obligation.

(b) Third-parties may include:

- Service Providers, including processors based in the United States who provide IT and system administration services.
- Professional advisers, including lawyers, bankers, auditors, and insurers based in the United States who provide consultancy, banking, legal, insurance, and accounting services.
- The Federal government of the United States and various state governments and their respective regulators and other authorities based in the United States who require reporting in certain circumstances.

Your Legal Rights

You have the right to:

(a) Request access to Your personal data (a “data subject access request”), which allows You to receive a copy of Your personal data held by us and to verify that we are lawfully processing it.

(b) Request disclosure information about the personal information we have collected from You, including (i) the categories and specific pieces of Your personal information collected, sold, or disclosed, (ii) the sources from which Your personal information was collected, (iii) the business purposes for collecting or selling Your personal information, and (iv) the categories of third-parties with whom Your personal information is shared.

(c) Request correction of Your personal data held by us, which allows You to have incomplete or inaccurate data held by us corrected (we might need to verify the accuracy of the new data You provide to us).

(d) Request erasure of Your personal data, which allows You to ask us to delete or remove personal data and to instruct third-parties to do the same, when there is no good reason for us continuing to process it; however, that does not apply to situations where Your personal data is necessary to (i) complete the transactions for which Your personal data was collected, (ii) provide the goods or services that You have requested, (iii) protect business property, or (iv) comply with applicable laws and regulations (e.g., the California Electronic Communications Privacy Act). You also may ask us to delete or remove Your personal data (a) when You have successfully exercised Your right to object to processing (see below), (b) if we have processed Your information unlawfully, or (c) if we are required to erase Your personal data to comply with local laws and regulations; however, we might not always be able to comply with Your request of erasure for specific legal reasons that would (if applicable) be shared with You at the time of Your request.

(e) Object to processing of Your personal data when we are relying on a legitimate interest (or those of a third-party) and there is something about Your particular situation that makes You want to object to processing on that basis because You believe it affects Your fundamental rights and freedoms. You also may object when we are processing Your personal data for direct marketing purposes. In some cases, however, we may be able to demonstrate that we have compelling legitimate grounds to process Your information, which override Your rights and freedoms.

(f) Request restriction of processing of Your personal data, which allows You to ask us to suspend the processing of Your personal data (i) if You want us to establish the data’s accuracy, (ii) if our use of the data is unlawful, but You do not want us to erase it, (iii) if You need us to hold the data (although we may no longer require it) because You need it to establish, exercise, or defend legal claims, or (iv) You have objected to our use of Your data, but we need to verify whether we have overriding legitimate interests to use it.

(g) Request the transfer of Your personal data to You or to a third-party. Upon verifying Your request, we will provide to You, or a third-party You have chosen, Your personal data in a structured, commonly used, readily-useable, machine-readable format. This right applies only to automated information that You initially provided consent for us to use or where we used the information to perform a contract with You.

(h) Withdraw consent at any time, if we are relying on consent to process Your personal data; however, this will not affect the lawfulness of any processing carried out before You withdraw Your consent. If You withdraw Your consent, we might not be able to provide certain products or services to You (we will advise You if this is the case, when You withdraw Your consent).

Rights of Minors

The Platform is not intended for use by children without appropriate parental or guardian involvement. Where required by law, parental or guardian consent must be granted before collecting personal data from minors.

General

The Company may update this Privacy Policy at any time by posting amended terms on the App. All amended terms take effect as of the updated effective date stated above, unless otherwise required by applicable law. The Company encourages You to read this Privacy Policy periodically to stay up-to-date about the Company's privacy practices. By continuing to access or use the Platform, You agree to be bound by the revised Privacy Policy. For questions about this Privacy Policy, please contact the Company at dataprivacy@qratilabs.com.

If the Company needs, or is required, to contact You concerning any event that involves information about You, the Company may do so by email, telephone, or mail.

Privacy Policy, v1.2

February 2026

Copyright 2026 Qrati Labs, LLC. All Rights Reserved.