

Privacy Policy

Last Revised: June 14, 2024

Ours Principles

This Privacy Policy ("Policy") describes how Dmitrii Kvashnin ("Publisher" or "**Mile AI**" or "we" or "our" or "us") treats information collected or provided in connection with an end user's ("you" or "your" or "User") use of the **Mile AI** mobile device software application ("App") and the **Mile AI** website located at www.mile-ai.com (the "Service" and together with the App, the "Services"). The Service is used by Users to keep track of and analyze the User's activities with one or more services providers and their potential tax impact (each a "Provider").

This Policy is drafted to comply with the California Consumer Privacy Act ("**CCPA**") (as amended by the California Privacy Rights Act ("**CPRA**")). In addition, this Policy is applicable to data subjects within the European Economic Area and the United Kingdom (collectively, the "**EEA**"). Therefore, this Policy is drafted to comply with the EU General Data Protection Regulation (EU) 2016/679 and the U.K. GDPR (collectively, the "**GDPR**"). Users of the Service are under no statutory or contractual obligation, or other obligation to provide PII to us. For the purposes of compliance with the GDPR, we are the data controller of information we collect from data subjects through the Services. For the purposes of this Policy, "**data subject**" means an identified or identifiable natural person located in the EEA.

Mile AI recognizes that using our service is a choice you make, and you can change your mind at any time. If you need assistance with canceling your subscription or deleting your account, please reach out to support@mile-ai.com^{**}.

Please note that your use of the Services constitutes your acceptance of this Policy as set forth below.

How the Service works

When you create an account, the onboarding screens provide guidance around collecting location data and optimizing your device for drive detection. The app runs in the background to detect drives based on the movement of your mobile device, so there is no need to press a start or stop button. You can customize the hours you work, location names and more, to make identifying and classifying drives easier. You can classify drives as business or personal (or delete them altogether) from the mobile app or the web dashboard. When you need to share drives, whether it's for taxes, employer reimbursement or other records, you can create a report and share it by email.

Automatic drive detection is dependent on factors you control (such as location services, motion services and battery usage) as well as factors outside of your control (such as no cellular reception).

What Data Is Collected

Mile AI collects precise geolocation information to provide you with drive data whenever you are logged in to the app and have location services turned on and available. Additional telemetry around how you interact with the app (what buttons are/aren't pushed, etc.) is collected to provide troubleshooting and improve the user experience. If you do not want drive data collected, you can log out of or delete the app. Logging out or deleting the app also stops additional telemetry from being collected.

Under the CCPA, precise geolocation information is considered "Sensitive Personal Information." As a result, California residents have a right to limit our use of such information.

While you must input an email address and password to create an account and use MileIQ, providing the following information is optional:

- **Identifiers:**
 - User identification
 - Device identification
 - Subscription Information including:
 - Subscription price
 - Subscription period
 - Subscription expiration date
 - Subscription status
 - IP Address
- **Drive-Related Information:**
 - Vehicle information
 - Location names for easier start and end point identification
 - Drive categories in addition to the preset categories based on IRS deductible mileage
 - Custom mileage rate and unit (km or mile)
 - Auto classification rules
 - Work hours
 - Frequent drives
 - Reports
 - Drive classifications
 - Notes, tolls and parking
 - Motions
- **Other Information:**
 - Notifications
 - Emails to support
 - Internet or Other Similar Network Activities including: Browsing History
Search History Interactions with the Services

We may also collect deidentified information from you that may not by itself reasonably identify you as the source when you utilize the Services (“**Deidentified Information**”). Deidentified Information may include:

- device type
- device operating system
- internet browser type
- internet service provider
- referring/exit pages,
- date/time stamp
- clickstream information

We will take reasonable measures to ensure that Deidentified Information we collect is not personally identifiable and may not later be easily used to identify you as required by applicable law.

We do not offer our Services or promote the Services to, nor do we intentionally collect or retain PII from, children who are younger than 13 years of age. If we discover that we have inadvertently collected information from a child under 13 years of age, we will promptly take all reasonable measures to delete such information from our systems.

How We Collect Information

The information we collect depends on what Users do when they utilize the Services. We collect Personally identifiable information (“**Personal Information**” or “**PII**”) and Deidentified Information in various ways, including:

Directly from You: We collect PII when you voluntarily submit PII to us while completing forms on the Services and in connection with other activities, services, features, or resources we make available on the Services. The PII we collect depends on what you do when you utilize the Services or how you choose to communicate with us.

Through Your Use of the Services: We may collect PII and Deidentified Information that your browser transmits when you utilize the Services. We may also collect Deidentified Information about how you access and interact with the Services through the use of automated tracking technologies, such as session cookies, persistent cookies, and web beacons.

A cookie is a small data file that is transferred to an internet browser, which enables the Services to remember and customize your subsequent visits. We may use session cookies to make it easier for you to navigate the Services. In particular, we may use session cookies to record session information, such as which web pages you visited and to track your activity on the Services. Session cookies expire when you close your browser. We may also use persistent cookies to track and target your interests to enhance your experience on the Services. Persistent cookies remain on your device for an extended period of time.

Most internet browsers automatically accept cookies. However, you can instruct your internet browser to block cookies or to provide you with a warning prompt before you accept cookies

from the Services. Please refer to your internet browser's instructions to learn more about these functions. If you reject cookies, the functionality of the Services may be limited and you may not be able to participate in several of the Services' features.

Additionally, we may use web beacons, which are single-pixel, electronic images embedded in the Services that allow us to gather information about your browsing activities on the Services.

From Third Party Services: We may collect PII about you from third parties whose privacy practices may differ from the practices described in this Policy. We do not make any representations or warranties concerning, and will not in any way be liable for, any informational content, products, services, software, or other materials available through third parties. Your use of third parties' services and/or third party websites is governed by and subject to the terms and conditions of those third parties and/or third party websites. We encourage you to carefully review the privacy policies and statements of such third parties and/or third party websites.

How We Use Information

We may use Users' PII for various general, lawful business purposes: (i) as necessary for the performance of our contract with Users (such as our Terms of Use), (ii) for our legitimate interests, so long as they are not overridden by Users' own rights and interests, or (iii) as required by law. These purposes include:

Delivery of the Services: We may use your PII and/or Deidentified Information to deliver automatic mileage tracking services and prepare reports on your driving activity.

Direct Marketing: We may use your PII to send you promotional materials. You have the right to opt-out of receiving direct marketing.

Customer Service and User Communications: We may use your PII to help us respond to your inquiries, questions, requests, and support needs more efficiently.

User Experience Personalization: We may use Users' PII and/or Deidentified Information in the aggregate to analyze Users' browsing and usage activities and patterns in order to understand Users' interests and preferences with respect to the Service and our services. This will help us optimize your experience on the Service.

Business Optimization: We may use your PII and/or Deidentified Information to improve the content on our web pages, to customize the content and layout of our web pages, and in managing our everyday business needs. We may also use your feedback to improve the Service and our other products and services. All of this is done with the intention of making the Service more useful for you.

Safety and Security: We may use your PII and/or Deidentified Information to promote the safety and security of the Service, our users, and other parties. For example, we may use the information to authenticate users, facilitate secure payments, protect against fraud and

abuse, respond to a legal request or claim, conduct audits, and enforce our terms and policies.

Company will not collect additional categories of PII or use PII we collect for materially different, unrelated, or incompatible purposes without providing you notice.

Disclosure of Information

We share and disclose the information we collect about you as follows:

(a) Third-party Service Providers. We use contractors and third-party service providers to assist us in making the Services available. Such third-party contractors or service providers may obtain access to the information you provide, including personally identifiable information. They are required to protect this information in a manner that is consistent with this Policy by, for example, not using the information for any purpose other than to carry out the Services they are performing for us.

(b) Advertising. We may provide advertisers and other third parties with aggregated, non-personally identifiable information about our user base and its interests and usage patterns. We may also partner with third party advertising companies in order to serve advertising regarding our products and services to users elsewhere on the web after they visit our website. This is a common practice called “retargeting.” For more information on such practices and the ability to opt-out, you may visit <http://www.aboutads.info>.

(c) Aggregated Data. We may make aggregated, anonymous data relating to activity on this Service available to third parties. By way of example only, this may include the provision or publication of reports regarding average income of contractors of a given Provider during some time period.

(d) Legal Requirement. We will use and disclose information where we, in good faith, believe that the law or legal process (such as a court order, search warrant or subpoena) requires us to do so or in other circumstances where we believe it is necessary to protect the rights or property of Company, our users and/or third parties.

(e) Affiliates. We may disclose this information to our affiliates for use as described in this Policy.

(f) Apple. If we receive a refund request for an in-app purchase from an end user, we reserve the right to provide Apple with information regarding the user's in-app purchase consumption. This includes the following data: app usage time, anonymous account identifier, total amount spent, and total amount refunded.

Security

The security and confidentiality of your PII is very important to us. We use commercially reasonable security measures to protect your PII on the Service. However, no data

transmitted over or accessible through the internet can be guaranteed to be 100% secure. As a result, while we attempt to protect your PII, we cannot guarantee or warrant that your PII will be completely secure (i) from misappropriation by hackers or from other nefarious or criminal activities, or (ii) in the event of a failure of computer hardware, software, or a telecommunications networks.

Legal Rights

We value the privacy and security of our users and our staff has been trained on **Privacy Rights** regulations to ensure your data is being handled with care.

We are committed to keeping your data secure and ensuring that you always have control over your data.

What this means for you?

We have always believed that your data should be controlled by you. We want to ensure that you can request access to your data and (or) delete your data at anytime. You may request info at anytime by contacting our support team and providing your account email and a form of identification. Contact us at support@mile-ai.com ****with subject lines of one of the following:

- Access request
- Rectification of personal data
- Erasure of personal data

Transfer to the U.S. or Other Countries

Company uses facilities in the United States. Your information will be stored and processed in the United States or other countries where Company has facilities. By using the Services, you consent to the transfer of information outside of your country, even if your country has more rigorous data protection standards.

Third Parties

The Services may contain offers from third parties or links to third-party websites. This Policy does not apply to information that you may provide to or that may be collected by third parties. We encourage you to request such third parties to provide you with their applicable privacy policies and other terms and conditions before engaging with or making a purchase from such third parties.

Modifications

We reserve the right to update this Policy from time-to-time in our sole discretion. If our privacy practices change materially in the future, we will post an updated version of the privacy policy to the Service. It is your responsibility to review this Policy for any changes

each time you use the Service. We will not lessen your rights under this Policy without your explicit consent. If you do not agree with the changes made, we will honor any opt-out requests made after the Effective Date of a new privacy policy.

Contacting Us

If you have any questions about this Policy, please contact us via email at support@mile-ai.com