

Aidealy Website Privacy Policy

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This Privacy Policy explains how **Aidealy Ltd.** ("Aidealy", "we", "us") handles personal data collected through our **marketing website** at aidealy.ai (the "Site").

This Policy covers the Site only. It does **not** cover: our SaaS product and account area (see the **Product Privacy Policy**), the Aidealy IDE extension (see the **Extension Privacy Notice**), or the detailed list of cookies (see our **Cookie Policy**).

1. Who we are (controller) and how to contact us

Aidealy Ltd. is a company registered in **Israel**, at **Hamidron 1, Herzliya 4654110, Israel** (company registration number: 517367066). For personal data collected through the Site, Aidealy is the **data controller**.

- **Privacy contact / data protection enquiries:** privacy@aidealy.ai
- **EU representative (GDPR Art. 27):** being appointed via **EuVerify** (GDPR Art. 27 service - EU + UK plan). Until that appointment completes, please contact privacy@aidealy.ai about anything you would otherwise raise with our EU representative. We will publish the representative's name and EU member-state address here on completion.
- **UK representative (UK GDPR Art. 27):** being appointed via **EuVerify** (same EU + UK plan). Until that appointment completes, please contact privacy@aidealy.ai. We will publish the representative's name and UK address here on completion.

2. What information we collect

We collect only what the Site needs:

- **Contact / request-a-demo form:** your name, email address, company, role, team size, which git providers and IDE tools you use, and the contents of your message. The form asks for your **consent** before we process your request, and offers a separate, **optional** opt-in to marketing communications.
- **Website analytics:** we measure aggregated statistics about how visitors use this Site via **Plausible**, a cookieless analytics service that does not store your IP address or set persistent identifiers, and only after you accept statistics cookies in our consent banner; we act as controller and Plausible as our processor.
- **Security: Cloudflare Turnstile** protects our forms from bots; depending on configuration it may set a strictly-necessary stored item (see the Cookie Policy).
- **Error monitoring: Sentry** helps us detect Site errors.
- **Marketing & CRM:** information you submit through our forms is stored in **HubSpot**, which we also use for marketing (and, if we activate advertising campaigns, for measuring and targeting our advertising).

We do **not** intentionally collect special-category / sensitive personal data through the Site, and ask you not to submit it via the contact form.

3. Why we use your information, and our legal basis

Purpose	Personal data	Legal basis (EEA/UK)
Respond to your enquiry / demo request	Contact-form data	Your consent (the form's consent box); performance of / steps prior to a contract; our legitimate interest in responding to enquiries

Purpose	Personal data	Legal basis (EEA/UK)
Send marketing communications you opted in to	Name, email (optional form opt-in)	Your consent (withdraw any time)
Measure Site usage	Plausible website analytics	Our legitimate interest in understanding and improving the Site
Protect our forms from abuse	Turnstile data	Our legitimate interest in Site security
Record and demonstrate your cookie choices (consent log)	Consent identifier and state, policy version, page address, browser user agent, first half of your IP address, date and time (kept 12 months, see section 4)	Our legal obligation to be able to demonstrate your consent (GDPR Art. 7(1)) and our legitimate interest in honouring your choices
Detect and fix errors	Sentry data	Our legitimate interest in a reliable Site
Marketing <i>(and advertising, if we activate it)</i>	CRM + marketing identifiers (HubSpot)	Your consent (for non-essential cookies/tracking and marketing messages)

Where we rely on legitimate interests, you have the right to object (see §11).

4. Cookies and similar technologies

We use cookies and similar technologies as described in our **Cookie Policy**. Non-essential cookies and trackers - including any marketing/advertising technologies used with HubSpot - are **set only after you consent** via our cookie consent banner (powered by Cookiebot), which lets you accept or reject them equally easily and withdraw consent at any time using the "**Manage cookies**" link in our footer. The banner is provided by **Usercentrics A/S (Cookiebot)**, which keeps the record of your choice in a consent log processed within the EU/EEA (hosted on Microsoft Azure in Ireland) for 12 months. Because the banner is delivered through Cookiebot's default content-delivery network, the request that fetches it before you make any choice (your IP address, browser user agent, page address and language) is served through the content-delivery network of Akamai Technologies, Inc., a United States company, which may handle the request outside Europe and may log connection details, including your IP address; Cookiebot itself uses that request only to serve the banner and keeps none of it after processing. The safeguards we rely on for data handled outside Europe are described in section 6. We also recognise browser-based opt-out signals (see §8).

5. Who we share your information with

We share personal data with service providers ("processors"/"sub-processors") who act for us under contract:

- **Vercel, Inc.** - hosting and delivery of the Site; its serverless functions run in Vercel's Dublin, Ireland region.
- **Cloudflare** - bot protection only (Turnstile, which runs invisibly on our contact form). For details of what Turnstile processes, see Cloudflare's Turnstile Privacy Addendum.
- **Usercentrics A/S (Cookiebot)** - our cookie consent banner and the consent log described in §4.
- **Mailgun** - email delivery: when you submit the contact form, your enquiry is emailed to our team via Mailgun (EU endpoint).
- **Sentry** - error monitoring.

- **HubSpot** - CRM, email, and marketing; if we activate advertising campaigns, also **advertising** (including measurement and targeting).
- **Plausible** - privacy-focused, cookieless website analytics.
- **Google** - business email: enquiries you send us through the contact form or by email are received and stored in our Google Workspace mailbox.

If we activate advertising campaigns, we will also share data with **LinkedIn and Google** for advertising measurement and targeting (see our Cookie Policy for the tracker details).

We do not sell your personal data for money. If we use advertising tools (HubSpot, LinkedIn, or Google) for cross-context behavioural advertising, some US state laws will treat this as **"sharing"** - see §8 for how to opt out.

Business transfers. If Aidealy is involved in a **merger, acquisition, financing, corporate reorganisation, or sale of some or all of its business or assets**, personal data may be disclosed to the prospective or actual acquirer, investor, or lender (and their professional advisers) as part of that transaction - during due diligence only to the minimum extent necessary and under confidentiality obligations - and may be transferred to the **successor entity** when the transaction completes. Where GDPR or UK GDPR applies, we rely on our **legitimate interests** in conducting and completing corporate transactions as the legal basis for these disclosures. Any successor may use your personal data only **consistently with this Policy as in force at the time**; if a successor intends to materially change that, you will be given the notice (or, where required, asked for the consent) that applicable law requires before the change applies to you. Under US state privacy laws such as the California CCPA, a transfer of personal information as an asset in such a transaction is not a "sale" or "sharing" of personal information.

6. International data transfers

Aidealy is based in **Israel**. Some of our providers are located outside your country. We rely on the following safeguards:

- **From the EEA:** Israel benefits from a **European Commission adequacy decision**, so transfers of personal data from the EEA to Aidealy in Israel are permitted without additional safeguards. For providers in the United States or elsewhere, we rely on an appropriate safeguard (such as the EU Standard Contractual Clauses or, where applicable, the EU-US Data Privacy Framework). You can request a copy of the safeguards using the contact in §1.
- **From the UK:** the UK recognises **Israel as providing adequate protection** ("data bridge"), so UK→Israel transfers need no additional safeguards. For US providers we rely on the UK-US "data bridge" or the UK International Data Transfer Agreement / EU SCCs with the UK Addendum.
- **From Israel:** we transfer data abroad in accordance with the Israeli Protection of Privacy (Transfer of Data Abroad) Regulations, relying on your consent and/or contractual undertakings from recipients.

7. Your rights

Depending on where you live, you may have the right to: **access** your data; **correct** it; **delete** it; **restrict** or **object** to processing; **portability**; and to **withdraw consent** at any time (without affecting prior processing). To exercise any right, contact us at privacy@aidealy.ai. We will respond within the time limits set by the law that applies to you. You will not receive discriminatory treatment for exercising your rights.

Verification, authorised agents, and if we decline your request. We **verify** requests (typically by confirming control of the email address the request concerns, or equivalent evidence), and where your local law allows an **authorised agent** to act for you, we accept agent requests with proof of your authorisation and verification of your identity. If we **decline** a request in whole or part, we tell you why and how to take it further: you may **appeal** by replying to our response or writing to privacy@aidealy.ai with "Appeal" in the subject, and we will have the appeal reviewed by someone other than the original decision-maker and respond **within 60 days** (or any shorter period your local law requires). If your appeal is unsuccessful and you are in a US state whose privacy law

provides it, you may **contact your state Attorney General**; wherever you live, you can also complain to your local data-protection authority (§12).

We do **not** make decisions about you based solely on automated processing (including profiling) that produce legal or similarly significant effects.

8. Your US privacy choices

If we use advertising tools (HubSpot, LinkedIn, or Google - see our Cookie Policy) for cross-context behavioural advertising, certain US state laws will treat this as "**sharing**" (even though no money changes hands). Your choices:

- **Opt out of sharing for advertising:** use the "**Do Not Sell or Share My Personal Information**" link in our footer. We also honour the **Global Privacy Control (GPC)** browser signal as a valid opt-out, and display confirmation when your opt-out preference signal has been honoured.
- We do **not** use or disclose **sensitive personal information** beyond the purposes permitted without a right to limit; if this changes we will provide a "Limit the Use of My Sensitive Personal Information" option.
- **Do Not Track:** some browsers send a "Do Not Track" signal; we currently respond to GPC as described above.

US residents also have rights to know, delete, correct, and opt out of targeted advertising, sale, and certain profiling. See §7 and §9 to exercise them.

9. Region-specific information

9.1 EEA / European Union

You may lodge a complaint with your local **supervisory authority**. The status of our EU representative, and how to reach us in the meantime, are set out in §1. We rely on the legal bases in §3.

9.2 United Kingdom

UK residents may complain to the UK data protection regulator, the **ICO**, at ico.org.uk - please contact us first so we can try to resolve it. UK law (the Data (Use and Access) Act 2025, in force) requires us to give you a way to complain to us directly: contact privacy@aidealy.ai, and we will acknowledge your privacy complaint within **30 days** and respond without undue delay. Our UK representative is in §1.

9.3 California and other US states

We provide the disclosures required by the CCPA/CPRA and other state privacy laws. The categories of personal information we collect (using statutory terms) are: **identifiers** (name, email, IP), **commercial/professional information** (company), **internet activity** (analytics, error logs), and **the contents of your communications**. For each we describe sources, purposes, retention, and whether shared in this Policy. We **do not sell** personal information for money. We also do **not** currently **share** it for cross-context behavioural advertising; if we start using advertising tools (HubSpot, LinkedIn, or Google) for that purpose, some US state laws will treat it as "sharing" - see §8 for how to opt out.

9.4 Israel

As an Israeli company, we provide notice under the Protection of Privacy Law. When you submit a form, providing your data is voluntary; **if you do not provide it, we cannot respond to your enquiry**. You have the right to **access** and **correct** your personal data held by us; contact us in §1.

9.5 South Korea

If you are in South Korea: our contact form asks for your **consent** before we process your enquiry, and presents a **separate, optional** opt-in for marketing emails, which you can decline without affecting anything else. This Policy sets out what we collect (§2), why (§3), who receives it and where (§5 and §6), how long we keep it (§10), and how to refuse or withdraw (§7 and §11).

Submitting the form sends your data outside Korea to the providers listed in §5, in Israel, the European Union and the United States; our business email provider, Google, may also process it in other countries where Google or its sub-processors have facilities.

Before we use your data for **advertising**, we will obtain your **separate, itemised consent** at the point of collection - stating the recipient, the purpose, the data items, the retention period, and your right to refuse. You may refuse that consent; refusing does not affect your ability to browse the Site or to contact us.

9.6 Japan

If you are in Japan, the Act on the Protection of Personal Information (APPI) applies to our handling of your data. We specify and make public our purpose of use. Your data is handled outside Japan: by us in **Israel** and by the service providers listed in §5, in the EU and the United States. **We do not rely on your consent for these cross-border transfers.** Before we serve visitors and contacts in Japan through providers outside Japan (other than recipients in the EU or the United Kingdom, which Japan's Personal Information Protection Commission has designated as equivalent), we will put in place with each such recipient **contractual safeguards that continuously secure protections equivalent to those the APPI requires of a Japanese business operator** (APPI Article 28(1); PPC Rules Article 16(i)) - including annual verification, monitoring of the recipient country's laws, and suspension where the safeguards fail - and, on your request, we will tell you how each recipient's safeguards are established, an outline of the protections, how we verify them, the recipient's country, any laws of that country that could affect them, and any impediments and our response (APPI Article 28(3); PPC Rules Article 18). The countries where your data is stored are stated in §5 and §6.

9.7 United Arab Emirates / Gulf

If you are in the **United Arab Emirates**, UAE Federal Decree-Law No. 45 of 2021 (the "UAE PDPL") restricts transfers of personal data outside the UAE. The UAE has not yet issued the PDPL's Executive Regulations, so no adequacy approvals under Article 22 have been published. Where we receive personal data of individuals located in the UAE through this website, we rely on **Article 23(1) of the PDPL, and principally on Article 23(1)(a)**: our contracts with the service providers that process this data obligate them to apply protections, measures and controls consistent with the requirements of the PDPL. When the Executive Regulations are issued, we will review this basis and update this section where required. We honour your right to object to processing for direct-marketing purposes.

9.8 Canada (including Quebec)

If you visit the Site from Canada, Canada's federal private-sector privacy law (**PIPEDA**) applies to the personal data described in this Policy, because we collect it in the course of commercial activity directed at you. If you are in Quebec, the Quebec **Act respecting the protection of personal information in the private sector** (as amended by "Law 25") also applies.

- **Who is responsible.** Aidealy Ltd. is responsible for your personal data, including when our service providers process it for us; we use contracts requiring them to protect it to a comparable level. For Quebec, our **person in charge of the protection of personal information** (responsable de la protection des renseignements personnels) is our founder, acting as **Privacy Officer**, reachable at privacy@aidealy.ai.
- **Consent.** We collect the form data in §2 with your consent (the form's consent box); marketing email is a separate, optional opt-in presented on its own, and you can withdraw either at any time. Marketing emails to Canadian addresses are sent only with that express opt-in, identify us, and include an unsubscribe we honour within **10 business days** (Canada's anti-spam law, CASL).
- **Processing outside Canada and Quebec.** Your data is processed outside Canada - in Israel, the EU/EEA and, for some providers, the United States (see §5); our business email provider, Google, may also process it in other countries where Google or its sub-processors have facilities. While your data is in another jurisdiction, it may be accessible to the courts, law enforcement, and

national-security authorities of that jurisdiction. For Quebec residents, we carry out the privacy assessment Quebec law requires before communicating personal information outside Quebec.

- **Your rights.** You may ask us to confirm what personal data we hold about you, access it, and correct it if inaccurate or incomplete. Quebec residents may also withdraw consent and, in the circumstances Quebec law defines, require us to stop disseminating their information or de-index links to it. We answer access and correction requests from Quebec within **30 days**.
- **Complaints.** Contact us first at privacy@aidealy.ai. You may also complain to the **Office of the Privacy Commissioner of Canada** (priv.gc.ca) and, in Quebec, to the **Commission d'accès à l'information** (cai.gouv.qc.ca), including by a "demande d'examen de mécontentement" within 30 days of our answer (or refusal, including a deemed refusal) to an access or correction request.

9.9 Australia and New Zealand

Australia. The Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs) may apply to our handling of your personal data when we carry on business in Australia. Whatever our formal status under that Act, we handle Australian visitors' personal data consistently with the APPs:

- **What we collect and why:** the contact and demo-request details in §2, collected directly from you, for the purposes in §3.
- **Access, correction and complaints:** ask us to access or correct your personal data using the contact details in §1. If you believe we have mishandled your personal data, please complain to us in writing first - we will respond within **30 days**. If you are not satisfied, you can complain to the **Office of the Australian Information Commissioner (OAIC)** at oaic.gov.au.
- **Overseas disclosure:** we are an Israeli company, and your data is processed in Israel and disclosed to our service providers in the European Union and the United States (see §5). We take reasonable steps, including contractual safeguards, to ensure these providers handle your data consistently with the APPs, and we remain accountable for their handling of it.
- **Marketing:** we only send marketing emails if you tick the separate marketing checkbox; every message identifies us and includes a working unsubscribe that we honour promptly and free of charge.
- **Automated decisions:** we do not use computer programs to make decisions that significantly affect your rights or interests based on personal data collected through the Site.

New Zealand. The Privacy Act 2020 may apply to us as an overseas agency carrying on business in New Zealand. This Policy, together with the notice at the point of collection, tells you what we collect, why, who receives it, and that Aidealy Ltd. (Hamidron 1, Herzliya 4654110, Israel) collects and holds it.

- **Your rights:** you may ask us to confirm whether we hold personal data about you, to access it, and to correct it (or attach a statement of correction), using the contact details in §1.
- **Complaints:** please raise any concern with us first; if we cannot resolve it, you can complain to the **Office of the Privacy Commissioner** (privacy.org.nz).
- **Overseas disclosure:** your data is processed outside New Zealand (Israel, the EU, and the US; our business email provider, Google, may also process it in other countries where Google or its sub-processors have facilities). Where we disclose it to our service providers, we rely on agreements requiring them to protect your data with safeguards comparable to New Zealand's Privacy Act; where such safeguards are not in place, we will only disclose your data with your authorisation, after expressly informing you that it may not receive comparable protection.
- **Marketing:** we only email you marketing if you opted in; every message identifies us and includes a free, working unsubscribe.

10. How long we keep your data

We keep personal data only as long as needed for the purpose collected: contact/CRM records for **24 months** after our last interaction with you, after which we delete them; cookie-consent records for **12 months** (see section 4); if you opted in to marketing communications, we stop sending them as soon as you unsubscribe or withdraw consent; analytics in aggregated form; and security, bot-

protection, and error-monitoring records only for the short operational period needed to keep the Site secure and working, after which they are deleted (we may keep statistics that no longer relate to any person).

11. How to object or withdraw consent

You can unsubscribe from marketing emails using the link in every such email (or by contacting us), change your cookie choices any time via the "**Manage cookies**" link in our footer, and object to processing based on legitimate interests by contacting us. You can also reach us at privacy@aidealy.ai about any of the above.

12. Representatives and complaints

12.1 EU representative

Aidealy's EU representative is **being appointed via EuVerify** (GDPR Art. 27 service - EU + UK plan, selected 2026-06-17). Until that appointment completes, please contact privacy@aidealy.ai about anything you would otherwise raise with our EU representative, including any request to exercise your rights under Section 11. We will publish the representative's name and EU member-state address in this Section on completion.

12.2 UK representative

Aidealy's UK representative is **being appointed via EuVerify** (same EU + UK plan). Until that appointment completes, please contact privacy@aidealy.ai. We will publish the representative's name and UK address in this Section on completion.

13. Security

We use appropriate technical and organisational measures to protect personal data, including **encryption in transit (HTTPS/TLS)**, **access controls** limiting who can see the data, bot protection on our forms, and use of reputable processors who maintain their own security safeguards.

14. Children

The Site is not directed to children, and we do not knowingly collect personal data from children under 16.

15. Changes to this Policy

We may update this Policy. We will post the new version here with a new "Last updated" date and, where required, notify you.

16. Contact

Questions about this Policy or your data: privacy@aidealy.ai, Aidealy Ltd., Hamidron 1, Herzliya 4654110, Israel.