

AKIRA LTD

PRIVACY POLICY · AKIRA AI ASSISTANT

Privacy Policy

How Akira LTD collects, uses, and protects your personal data — across the US, EU, UK, Canada, Australia, and worldwide.

Effective Date: [INSERT DATE] · **Last Updated:** [INSERT DATE]

This Privacy Policy explains how **Akira LTD** (“Akira”, “we”, “us”, “our”), a company registered at Cherni Vrah Blvd 26, Entr. A, Fl. 1, Lozenets, Sofia 1421, Bulgaria, collects, uses, shares, and protects information about you when you purchase, access, or use our AI assistant product (the “Product”), visit our website, or otherwise interact with us.

This Policy should be read together with our Terms of Service, Return Policy, and End User License Agreement (EULA).

QUICK SUMMARY: we collect only what we need to deliver the Product, fulfil your order, support you, secure our service, and comply with the law. We do not sell your personal data. You have rights over your data — including access, correction, and deletion — which you can exercise at operations@akira.ltd.

1. Who We Are

Akira LTD is the data controller responsible for your personal data.

Company: Akira LTD

Registered address: Cherni Vrah Blvd 26, Entr. A, Fl. 1, Lozenets, Sofia 1421, Bulgaria

Company number: [INSERT COMPANY REGISTRATION NUMBER]

Privacy contact: operations@akira.ltd

Data Protection Officer (where appointed): [INSERT NAME / OR DELETE LINE]

EU/UK Representative (if outside EU/UK): [INSERT IF APPLICABLE]

2. Scope of This Policy

This Policy applies to personal data we process about:

- Customers and prospective customers who purchase, evaluate, or enquire about the Product;
- Visitors to our website and digital storefronts;
- Recipients of our marketing communications;
- Anyone who contacts us by email, form, or other channel.

If you are a resident of the European Union, United Kingdom, European Economic Area, California, Quebec, Australia, or another jurisdiction with specific privacy law, additional rights may apply (see Section 9).

3. Personal Data We Collect

3.1 Account & contact data. Name, email address, billing address, country, language, phone number (if provided), and password hash.

3.2 Purchase & transaction data. Order ID, products purchased, purchase price, payment method type (e.g. “Visa ending 1234”), invoice metadata, and refund history. Full payment-card details are processed by our payment processor and are not stored on our systems.

3.3 Product usage data. Information generated as you use the Product, including: prompts you submit, outputs the Product generates, session timestamps, feature usage, and (where logged for support and abuse prevention) AI model interaction metadata.

3.4 Device & technical data. IP address, device type, operating system, browser, language settings, time zone, referrer URL, and diagnostic logs.

3.5 Communications data. Emails, support tickets, refund requests, complaints, and any other correspondence you send us.

3.6 Marketing data. Newsletter subscription status, marketing preferences, and email open/click data (where you have consented or where applicable law permits).

3.7 Cookies & similar technologies. Information collected via cookies, pixels, and local storage — see Section 12.

SENSITIVE DATA: we do not knowingly collect special-category data (health, racial/ethnic origin, political views, religion, sexual orientation, biometric or genetic data) and we ask you NOT to input such data into the Product. If you do, you do so at your own risk and consent to our processing of it for the purpose of delivering the Product.

4. How We Collect Personal Data

- Directly from you — when you create an account, purchase the Product, contact support, complete a form, or use the Product.
- Automatically — through cookies, server logs, and analytics technologies when you visit our website or use the Product.
- From third parties — our payment processor (transaction confirmation, basic billing details), authentication providers (if you log in via SSO), fraud-prevention services, and publicly available sources where lawful.

5. Why We Use Personal Data & Lawful Bases

We use personal data for the purposes below. Where the EU/UK GDPR applies, the corresponding lawful basis is shown.

5.1 Deliver and operate the Product. Process orders, deliver access, authenticate users, run the AI assistant, provide support. Lawful basis: performance of contract.

5.2 Process payments and prevent fraud. Verify payments, detect fraudulent transactions, manage chargebacks. Lawful basis: performance of contract; legitimate interests; legal obligation.

- 5.3 Communicate with you.** Service announcements, transactional emails, refund correspondence, security alerts. Lawful basis: performance of contract; legitimate interests.
- 5.4 Improve and secure the Product.** Diagnose bugs, prevent abuse, monitor performance, protect against attacks, develop new features. Lawful basis: legitimate interests.
- 5.5 Comply with legal obligations.** Tax record-keeping, accounting, regulatory reporting, response to lawful requests from authorities. Lawful basis: legal obligation.
- 5.6 Marketing.** Send you newsletters, product updates, and promotional offers. Lawful basis: consent (where required) or legitimate interests (for existing customers, where permitted by law). You can unsubscribe at any time.
- 5.7 Defend legal claims.** Establish, exercise, or defend Akira's legal rights. Lawful basis: legitimate interests.

6. Who We Share Personal Data With

We share personal data only as needed and only with parties bound by appropriate confidentiality and data-protection obligations. Categories of recipients include:

- 6.1 Payment processors.** Such as [INSERT — e.g. Stripe, PayPal] for processing payments and refunds. They process your card data directly under their own privacy policies.
- 6.2 AI model providers & infrastructure.** Where the Product relies on third-party AI models or APIs (e.g. [INSERT — e.g. OpenAI, Anthropic, Google, etc.]), prompts and certain technical metadata may be transmitted to them solely for the purpose of generating Output. These providers operate under their own enterprise data terms.
- 6.3 Cloud hosting & email delivery.** Such as [INSERT — e.g. AWS, Google Cloud, SendGrid] for hosting the service and sending transactional emails.
- 6.4 Analytics & error monitoring.** Such as [INSERT — e.g. Google Analytics, Plausible, Sentry] to understand product use and diagnose errors. Where required by law, we obtain consent before deploying non-essential analytics.
- 6.5 Customer support tooling.** Such as [INSERT — e.g. Zendesk, Intercom] for ticketing, when you contact support.
- 6.6 Professional advisors.** Lawyers, accountants, auditors, and tax authorities, as required by law or to protect our legitimate interests.
- 6.7 Authorities.** Law enforcement, courts, or regulators, when legally required or to protect rights, property, or safety.
- 6.8 Successors in business.** In a merger, acquisition, restructuring, or sale of assets, your data may be transferred to the successor entity, subject to this Policy.

WE DO NOT SELL YOUR PERSONAL DATA: Akira does not sell or rent personal data to third parties for monetary or other valuable consideration as defined under the CCPA/CPRA, Quebec Law 25, or equivalent laws.

7. International Data Transfers

Personal data may be processed in countries outside your country of residence, including the United States, the European Economic Area, the United Kingdom, and other jurisdictions where Akira or its service providers operate.

Where we transfer personal data outside the European Economic Area, the United Kingdom, or other regions with similar protections, we rely on appropriate safeguards, including:

- European Commission and UK ICO Standard Contractual Clauses (SCCs / IDTA);
- Adequacy decisions, where available;
- Other transfer mechanisms recognised under applicable law.

You may request a copy of the relevant safeguards by contacting operations@akira.ltd.

8. How Long We Keep Personal Data

We retain personal data only as long as necessary for the purposes set out above, including legal, accounting, or reporting requirements. Indicative retention periods:

8.1 Account & contact data. While your account is active and for up to seven (7) years after closure, in line with tax and statutory record-keeping requirements.

8.2 Purchase & invoice data. For up to ten (10) years from the date of transaction, where required by tax and accounting law.

8.3 Product usage logs. Typically up to twelve (12) months, after which logs are deleted or aggregated/anonymised, unless retention is required for security investigation, fraud prevention, or legal claims.

8.4 Support and complaints data. For up to six (6) years from the resolution of the matter.

8.5 Marketing data. Until you unsubscribe or otherwise object, plus a short suppression-list retention to ensure we honour your preference.

After the relevant retention period expires, we delete or anonymise the data.

9. Your Rights

Subject to applicable law and certain exemptions, you have the following rights in relation to your personal data. To exercise any of them, email operations@akira.ltd. We may need to verify your identity before responding.

EU / UK / EEA — GDPR & UK GDPR RIGHTS: you have the right to: access; rectification; erasure (“right to be forgotten”); restriction of processing; data portability; objection (including to direct marketing); withdraw consent at any time; and lodge a complaint with your supervisory authority.

CALIFORNIA (CCPA / CPRA): you have the right to know what personal information we collect, use, share, and disclose; the right to delete personal information; the right to correct inaccurate personal information; the right to opt out of “sale” or “sharing” for cross-context behavioural advertising; the right to limit use of sensitive personal information; and the right not to be discriminated against for exercising any of these rights.

CANADA (PIPEDA & QUEBEC LAW 25): you have the right of access and correction. Quebec residents additionally have rights to data portability, de-indexing, and to be informed of any automated decision based solely on personal information.

AUSTRALIA (PRIVACY ACT 1988): you have the right to access and seek correction of your personal information held by us, and to make a complaint to us or to the Office of the Australian Information Commissioner (OAIC).

Other jurisdictions: where local privacy law grants you specific rights (e.g. Brazil LGPD, South Africa POPIA), we will honour those rights to the extent applicable.

10. Children's Privacy

The Product is not intended for use by children. We do not knowingly collect personal data from children under sixteen (16) years of age (or, in the United States, under thirteen (13) years of age, in line with COPPA).

If you believe a child has provided personal data to us, please contact operations@akira.ltd and we will delete it.

11. Security

We use reasonable technical and organisational measures designed to protect personal data, including encryption in transit (TLS), encryption at rest where appropriate, access controls, secure development practices, vendor due diligence, and regular reviews.

No method of transmission or storage is fully secure. You are responsible for keeping your account credentials confidential. If you believe your account or any personal data has been compromised, contact operations@akira.ltd immediately.

Where required by law, we will notify affected individuals and competent authorities of any personal-data breach within the applicable deadlines.

12. Cookies & Similar Technologies

We use cookies, pixels, and local storage to operate, secure, and improve the Product and our website. We use:

- 12.1 Strictly necessary cookies.** Required for the website and Product to function (e.g. login session, fraud prevention). These cannot be disabled.
- 12.2 Functional cookies.** Remember your preferences and settings.
- 12.3 Analytics cookies.** Help us understand how the Product is used so we can improve it.
- 12.4 Marketing cookies.** Help us deliver relevant communications and (where applicable) measure marketing effectiveness.

Where required by EU/UK ePrivacy law or equivalent, we obtain your consent before deploying non-essential cookies. You can withdraw consent or change your preferences at any time via the cookie banner or your browser settings.

13. AI Processing & Automated Decisions

13.1 AI processing. The Product is an AI-powered assistant. When you submit prompts, those prompts — and certain related technical metadata — may be processed by us and by third-party AI model providers solely to generate Output for you. We instruct providers, where contractually possible, not to use your prompts to train their general models.

13.2 No solely-automated significant decisions. We do not use automated decision-making (including profiling) that produces legal effects concerning you or similarly significantly affects you, except where you have explicitly consented or where required by law and with appropriate safeguards. Where applicable law (such as EU/UK GDPR Article 22 or Quebec Law 25) grants you rights in relation to automated decisions, we will honour those rights.

13.3 Output is not personal advice. Output generated by the Product is informational and does not constitute legal, medical, financial, or other professional advice. See the Terms of Service for further detail.

14. Changes to This Policy

We may update this Privacy Policy from time to time. The most recent version will indicate the “Last Updated” date. Material changes will be communicated by reasonable means before they take effect (e.g. by email to your registered address or by prominent notice in the Product).

15. Complaints

If you have any concerns about our processing of your personal data, please contact operations@akira.ltd first — we will work in good faith to resolve them.

You also have the right to lodge a complaint with your local data-protection authority.

Examples:

- EU — your national supervisory authority (full list at edpb.europa.eu);
- United Kingdom — Information Commissioner’s Office (ico.org.uk);
- Canada — Office of the Privacy Commissioner of Canada (priv.gc.ca); Quebec residents may also contact the Commission d’accès à l’information du Québec;
- Australia — Office of the Australian Information Commissioner (oaic.gov.au);
- California — California Privacy Protection Agency (cppa.ca.gov) or your State Attorney General;
- Other US states — your State Attorney General.

16. Contact

For privacy questions, requests, or to exercise any of your rights:

Akira LTD

Email: operations@akira.ltd

Registered address: Cherni Vrah Blvd 26, Entr. A, Fl. 1, Lozenets, Sofia 1421, Bulgaria

Subject line for privacy requests: “Privacy Request — [type]”

ACKNOWLEDGEMENT

By using our Product or website, you acknowledge that you have read and understood this Privacy Policy.