

Privacy Policy

Version 1.2

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Cerebry is an AI company from Singapore, working to build STEM-based Homework and Assessment Solutions for School Students. This Privacy Policy explains how we collect, use, disclose, and otherwise process your personal data when you use our website and other places where Cerebry may act as a data controller and link to this Privacy Policy—for example, when you use Cerebry APIs or other products as a consumer for personal use (“Services”). It also describes your privacy rights. More information about your rights, and how to exercise them, is set out in the “Rights and Choices” section.

This Policy does not apply where Cerebry acts as a “data processor,” such as with respect to personal data we receive, process, store, or host when you use Cerebry’s AI services as or through an enterprise customer, unless otherwise specified in this policy. In those cases, the enterprise customer company is the controller, and you can review their privacy policy for more information about how they handle your personal data.

To reiterate, our Privacy Policy is underpinned by our dedication to the following Privacy Principles:

- We are strongly committed to establishing a safe and secure online environment for your benefit.
- We do not share your personal information with third parties. Our goal is to offer you access to your data and give you control over it, and we place utmost importance on safeguarding your information.
- We take additional measures to protect our younger learners, as outlined in our Children’s Privacy Notice.
- We do not feature third-party advertisements on Cerebry. Our primary mission is to provide you with a top-notch education, not to promote or sell products

1. Collection of Personal Data

When we refer to “personal data,” we mean information that relates to you. We collect the following categories of personal data:

Personal data you provide to us directly

Identity and Contact Data:

Cerebry may collect identifiers, such as your name , email address and phone number, when you sign up for a Cerebry account, to receive information on our Services, or submit an application for an employment opportunity. If you do not provide us with this information, we will not be able to administer your Cerebry account. We may also collect indirect identifiers (e.g., “USER12345”).

Payment Information:

We will collect your payment information if you choose to purchase access to Cerebry’s products and services. If you don’t provide us with this information, we will not be able to facilitate payment for Cerebry’s products and services.

Professional Information:

If you apply for employment with us, Cerebry may collect professional information, such as your employment history, your qualifications, and any other information contained in your CV or résumé.

Feedback on your use of our Services:

Where applicable, we will collect your Feedback (as defined in our [Terms of Service](#)) regarding Prompts and Outputs, and use it under your authorization to train and improve our Services. This might arise if, for example, you report that Cerebry returned inaccurate information in an Output, or if you rate an Output to your Prompt using the thumbs-up/thumbs-down icon. We may also collect and use this information for the same purposes when you use our enterprise services.

Personal data we receive automatically from your use of the Services

When you use the Services, we may also receive certain technical data automatically (together “Technical Information”). This includes:

- Internet or other electronic network activity information, including your device type.

- IP address (including information about the location of the device derived from your IP address).

- Device or advertising identifiers, probabilistic identifiers, and other unique personal or online identifiers.

- Information about your device and operating system, such as time zone setting and location, operating system and platform.

- Information about your browser, such as browser type and version, browser plug in types and versions.

- Internet service provider.

- Pages that you visit before and after the website, browsing history, search history, and the date and time of your visit.

Information about the links you click, pages you view, and other information about how you use the Services.

The technology on the devices you use to access the Services.

Standard server log information.

If you or your device experiences an error, we may collect information about the error, the time the error occurred, the feature being used, the state of the application when the error occurred, and any communications or content provided at the time the error occurred.

In these contexts, Cerebry receives personal data from the following categories of sources: directly from you, such as when you interact with the Cerebry website, and from internet service providers.

2. Cookies & Similar Technologies

We and our service providers use cookies, scripts, or similar technologies (“cookies”) to manage the Services and to collect information about you and your use of the Services. These technologies help us to recognize you, customize or personalize your experience, offer additional products or services to you, and analyze the use of our Services to make it more useful to you.

These technologies may also allow us to collect demographic and statistical data and provide this information to our service providers to help deliver their services.

We use cookies that are strictly necessary in order to facilitate your access to our Services or ensure your safety, as well as cookies or similar technologies for analytics.

These technologies help us improve and optimize the experience we provide—for example, by helping us measure how visitors interact with our platforms. We may collect technical information, such as pages visited and length of time between clicks.

Most browsers allow you to remove or manage cookie functions and adjust your privacy and security preferences. For information on how to do this, access the “help” menu on your browser, or access <http://www.aboutcookies.org/how-to-control-cookies>. Please note, however, that disabling our cookies may mean that you may not be able to take full advantage of our Services.

3. Privacy considerations when using Cerebry’s custom built GPTs

GPTs are custom versions of ChatGPT, an artificial intelligence tool offered by OpenAI. As a builder, Cerebry shares anonymized answers to math and science questions submitted by students either during practice, revision or post-test remedial practice. Cerebry receives information from OpenAI

about such questions or prompts, which does not contain personal identifying information, and Cerebry's custom built GPT responds to the prompt.

The sole purpose of sharing the answers with OpenAI is to analyze the responses for correctness, conceptual understanding, and to generate educational feedback. This process is crucial in offering personalized learning experiences and support to students. Cerebry does not have access to your personal data when you use Cerebry's custom built GPT.

Remember: Cerebry's Custom Built GPTs are an AI tool. We recommend that you do NOT share personal data when using Custom Built GPTs or any other large language model (LLM).

4. Uses of Personal Data and (for Europe) our Legal Bases

We will only use your personal data when the law allows us to. Usually, we rely on the following grounds under European data protection laws (our "**Legal Bases**"):

Where we need it to perform a **contract** with you. For example, we process Identity and Contact Data, Prompts, Outputs and Payment Information in order to provide Services to you.

Where it is necessary for our **legitimate interests** (or those of a third party) and your interests and rights do not override our interests. Our legitimate interests include:
providing, maintaining and improving our products and services;
research and developing, including developing new products and features;
marketing our products and services;

detecting, preventing and enforcing violations of our terms including misuse of services, fraud, abuse, and other trust and safety protocols; and
protecting our rights and the rights of others.

Where you have given us your **consent**. You have the right to withdraw your consent at any time.

Where we need to comply with our **legal obligations**.

We use your personal data for the following purposes:

Purpose	Type of Data	Legal Basis
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To provide and facilitate the Services, including to fulfill any contracts with you with respect to your Cerebry account	Identity and Contact Data Payment Information Feedback	Contract
To communicate with you for non-marketing purposes including by sending you emails, and other messages	Identity and Contact Data	Contract Legitimate interests
To send you marketing communications, where you have signed up to receive them	Identity and Contact Data	Consent
To review and consider your application for employment with Cerebry, if you choose to apply	Identity and Contact Data Professional Information	Contract Legitimate interests
To create and administer your Cerebry account	Identity and Contact Data Payment Information Feedback	Contract Legitimate interests
To facilitate payments for products and services provided by Cerebry	Identity and Contact Data Payment Information	Contract Legitimate interests
To prevent and investigate fraud notifications, unlawful or criminal activity, unauthorized access to or use of personal data or Cerebry systems and networks, and to meet governmental and institutional policy obligations	Identity and Contact Data Payment Information Prompts and Outputs Technical Information	Legitimate interests Legal obligation
To investigate and resolve disputes	Identity and Contact Data Prompts and Outputs Feedback Professional Information (if the dispute is connected to your employment with Cerebry)	Legitimate interests Legal obligation

To investigate and resolve security issues	Identity and Contact Data Feedback Technical Information	Legitimate interests Legal obligation
To debug and to identify and repair errors that impair existing functionality	Identity and Contact data Feedback Technical Information	Legitimate interests
To improve the Services and conduct research	Identity and Contact Data Feedback Technical information	Consent Legitimate interests
To de-identify it and train our AI models	Prompts and Outputs Feedback Technical Information	Consent Contract Legitimate interests
To enforce our Terms of Service and similar terms and agreements, including our Acceptable Use Policy .	Identity and Contact Data Prompts and Outputs Technical Information	Contract Legitimate interests

Aggregated or De-Identified Information.

We may process your personal data in an aggregated or de-identified form for the purposes of analyzing the effectiveness of our Platform, our Services, conducting research, analyzing the behavior of users of our Platform and Services and training our models and interfaces. Usually, we only do so under your authorisation—i.e., where you act as the controller for any personal data contained in Prompts and Outputs. We will also do so without reference to you when our purpose is to enforce and train our classification models for trust and safety purposes.

5. How We Disclose Personal Data

Cerebry will disclose personal data to the following categories of third parties for the purposes explained in this Policy:

Affiliates & corporate partners. Cerebry discloses the categories of personal data described above between and among its affiliates and related entities.

Service providers & business partners. Cerebry may disclose the categories of personal data described above with service providers and business partners for a variety of business purposes, including website and data hosting, ensuring compliance with industry standards, research, auditing, and data processing.

Cerebry may also disclose personal data in the following circumstances:

As part of a significant corporate event. If Cerebry is involved in a merger, corporate transaction, bankruptcy, or other situation involving the transfer of business assets, Cerebry will disclose your personal data as part of these corporate transactions.

To comply with regulatory or legal requirements, safety and to enforce our terms. We may disclose personal data to governmental regulatory authorities as required by law, including for tax or accounting purposes, in response to their requests for such information or to assist in investigations. We may also disclose personal data to third parties in connection with claims, disputes or litigation, when otherwise required by law, or if we determine its disclosure is necessary to protect the health and safety of you or any other person, to protect against fraud or credit risk, or to enforce our legal rights or contractual commitments that you have made.

With an individuals' consent. Cerebry will otherwise disclose personal data when an individual gives us permission or directs us to disclose this information.

If you access third-party services, such as social media sites or other sites linked through the Services (e.g., if you follow a link to our Facebook or Instagram account), these third-party services will be able to collect personal data about you, including information about your activity on the Services. If we link to a site or service via our Services, you should read their data usage policies or other documentation. Our linking to another site or service doesn't mean we endorse it or speak for that third party.

6. Rights and Choices

Subject to applicable law, and depending on where you reside, you may have some rights regarding your personal data, including the following:

Right to know. You may have the right to know what personal data Cerebry processes about you, including the categories of personal data, the categories of sources from which it is collected, the business or commercial purposes for collection, and the categories of third parties to whom we disclose it.

Access & data portability. You may have the right to request a copy of the personal data Cerebry processes about you, subject to certain exceptions.

Deletion. You may have the right to request that we delete personal data collected from you and retained, subject to certain exceptions.

Correction. You may have the right to request that we correct inaccurate personal data Cerebry retains about you, subject to certain exceptions. Please note that we cannot guarantee the factual accuracy of Outputs. If Outputs contain factually inaccurate personal data relating to you, you can submit a correction request and we will make every effort to correct this information—but due to the technical complexity of our large language models, it may not always be possible for us to do so. You may also submit a deletion request.

Objection. You may have a right to object to some processing activities.

Withdrawal of consent. Where Cerebry processing of your personal data is based on consent, you have the right to withdraw your consent.

Sale & targeted advertising. Cerebry does not “sell” your personal data as that term is defined by applicable laws and regulations. Cerebry also does not engage in targeted advertising using your personal data.

Do Not Track. Some web browsers provide a “Do Not Track” option. We currently do not respond to browser “Do Not Track” signals.

To exercise your rights, you or an authorized agent may submit a request by emailing us at Info@Cerebry.co. After we receive your request, we may verify it by requesting information sufficient to confirm your identity. You may also have the right to appeal requests that we deny by emailing Info@Cerebry.co.

7. Third-Party Websites and Services

Our Services may involve integrations with, or may direct you to, websites, apps, and services managed by third parties. By interacting with these third parties, you are providing information directly to the third party and not Cerebry and subject to the third party’s privacy policy. For example, if you use the Services to apply for employment, this could involve an integration with a third-party product, subject to that third party product’s privacy policy.

7A. Google Classroom Integration

Cerebry’s feature to enable Educators to obtain Student Email, Assignment and Grade Information to any other app of information received from Google APIs will adhere to [Google API Services User Data Policy](#), including the Limited Use requirements.

8. Data Transfers

When you access our website or Services, your personal data may be transferred to our servers in the US, or to other countries outside the EEA and the UK. This may be a direct provision of your personal data to us, or a transfer that we or a third party make (the latter being a “**Transfer**”).

Where information is transferred outside the EEA or the UK, to a country that is not subject to an adequacy decision by the EU Commission or an adequacy decision issued or recognised under UK data protection law (as applicable), you should be aware that it may be subject to a lower standard of protection. In respect of Transfers, we will ensure that your personal data is adequately protected by EU Commission and/or UK data protection law approved standard contractual clauses (as applicable) or applicable Binding Corporate Rules.

You can ask us to provide more information about the service providers we use and their locations. You may ask us to provide further information about this, or to provide you with a copy of the appropriate safeguard, by contacting us at Info@Cerebry.co.

9. Data Retention

Cerebry retains your personal data for as long as reasonably necessary for the purposes and criteria outlined in this Policy.

10. Children’s Privacy Notice

This privacy notice supplements our Privacy Policy and provides additional information about how we collect, use and disclose personal information from children under the age of 13 (a “Child” or “Children”).

Cerebry is committed to Children’s privacy.

Protecting the privacy of Children is especially important to Cerebry. For that reason, we created certain features designed to help protect personal information relating to Children (“Child Users”). When Cerebry is used by a School in an educational setting, we rely on the School to provide the requisite consent, on behalf of the Parent, for Cerebry to collect information from a School User under the age of 13 for educational purposes.

11. Changes to Our Privacy Policy

Cerebry may update this Privacy Policy from time to time. When we make updates, we will post the updated Privacy Policy on this page and will update the Effective Date. We encourage you to review this page for updates when you access the Services.

12. Contact Information

The responsible entities in respect of your personal data are:

Cerebry Pte. Ltd. with a registered address at Singapore
company registration no.: 201621279N 385 Pasir Panjang Road, #02-11,
Singapore 118719
Contact: Shubham Goyal (CEO, Shubham@Cerebry.co)

You can email us at Info@Cerebry.co

Please note that you have the right to lodge a complaint with the supervisory authority in the EU country in which you live or work. A full list of EU supervisory authorities' contact details is available [here](#). If you live or work in the UK, you have the right to lodge a complaint with the [UK Information Commissioner's Office](#).