**ComposeAlpha Platform Privacy Notice**

This Platform Privacy Notice was last updated on **April 15, 2026**

We, Infostretch Corporation dba Apexon (**"we"**, **"us"**, **"our"** **"Company"**, **"Apexon"**) are the owners of the website https://www.apexon.com/partners/atlassian-partnership/ (**"Website"**). The Website showcases the Company's **ComposeAlpha – AI Assistant Generate user stories, test cases, and automation scripts directly inside Atlassian Jira using AI.** (the **"Software"**). The Website and the Software are hereinafter collectively referred to as the **"Platform"**.

The Platform enables **ComposeAlpha to help agile teams automate requirement analysis, quality evaluation, and test creation—reducing manual effort and improving consistency across your SDLC** ("Services").

We respect data privacy rights and are committed to protecting Personal Information collected on this Platform. This Privacy Notice (**"Privacy Notice"**) sets forth *how we collect, use and protect the Personal Information* collected on this Platform. **"Personal Information"** means any information relating to an identified or identifiable natural person. Depending on the jurisdiction, Personal Information may also be referred to as **Personal Data**, and shall have the same meanings.

In order to use the Services, it shall be your responsibility to comply with both this Privacy Notice and any agreements executed between the Customer and the Company. If the Privacy Notice is inconsistent with any provision contained in the specific agreements, the Company shall determine, in its sole and absolute discretion, which of the provisions shall control any such inconsistency or conflict.

**PLEASE READ THIS PRIVACY NOTICE CAREFULLY. BY CLICKING ON THE CONSENT CHECK BOX, AND BY PROVIDING US PERSONAL INFORMATION, YOU CONSENT TO OUR USE OF YOUR PERSONAL INFORMATION IN ACCORDANCE WITH THE TERMS OF THIS PRIVACY NOTICE. IF YOU DO NOT AGREE TO THIS PRIVACY NOTICE, YOU MAY WITHDRAW YOUR CONSENT OR ALTERNATIVELY CHOOSE NOT TO PROVIDE YOUR PERSONAL INFORMATION ON THE PLATFORM. SUCH AN INTIMATION TO WITHDRAW YOUR CONSENT CAN BE PROVIDED BY EMAIL TO info@apexon.com.**

**IF YOU ARE ACCESSING THE PLATFORM ON BEHALF OF A THIRD PARTY, YOU REPRESENT THAT YOU HAVE THE AUTHORITY TO BIND SUCH THIRD-PARTY TO THE TERMS AND CONDITIONS OF THIS PRIVACY NOTICE AND, IN SUCH AN EVENT YOUR USE OF THE PLATFORM SHALL REFER TO USE BY SUCH THIRD PARTY. IF YOU DO NOT HAVE SUCH AN AUTHORITY (TO PROVIDE ANY PERSONAL INFORMATION OF A THIRD PARTY) OR DO NOT AGREE TO THE TERMS OF THIS PRIVACY NOTICE, THEN YOU SHOULD REFRAIN FROM USING THE PLATFORM.**

This Privacy Notice is an electronic record in the form of an electronic contract compliant and construed in accordance with data protection laws of the applicable jurisdictions.

## 1. DEFINITIONS

i. **"User(s)"** **"you"**, **"your"** shall mean individuals that visit/use/access the Platform on behalf of the Customer;
ii. **"Customer"** shall mean an entity, organizer, which avails the Platform;
iii. **"Controller"** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data;

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iv. "**Processor**" means a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller.

## 2. WHAT PERSONAL DATA IS COLLECTED BY US?

We may collect your Personal Data in the following ways:

i. **Personal Data collected through our Platform:** We may receive your Personal Data when you use our Platform and avail Services. We may receive your Personal Data including but not limited to your name and email address.

ii. **User account:** You may provide Personal Data including but not limited to your name, email address, company name, designation, username, password when creating an account on our Platform.

We may receive your Personal Data from our Customer/s, in which case, we will act as a Processor and the Customer is the Controller. We process Personal Data only in accordance with the instructions of the Customer.

## 3. WHAT PERSONAL INFORMATION DO WE PROCCESS ON BEHALF OF THE CUSTOMER?

This section concerns the Personal Data of the User collected by the Customer, and such collection may be facilitated by us.

i. **The Company as a Data Controller:** The Company will act as a Data Controller wherein the Company will determine the purpose and means of processing the Personal Data.
ii. **The Company as a Data Processor:** The Customer sets the purpose and means of processing of such Personal Data. We process such Personal Data only on behalf of and on the instructions of the Customer and for the purpose of rendering our Services to the Customer.
iii. **Customer Privacy Notice:** If you are the User of the Platform and your Personal Data was shared with us by the Customer, the Privacy Notice of the Customer, on whose behalf we collect and process the Personal Data, will apply. This means that any enquiry, request, objection or complaint that you as a User may have in connection with the collection and/or processing of Personal Data that forms part of your Platform usage should be addressed to and resolved by the Customer.
iv. **Personal Information:** Depending on the nature of Services and Customer requirements, the Company processes Personal Data on behalf of Customer/s. We may process Personal Data including but not limited to the name, email ID, username, password,
v. Further, the Personal Data collected on behalf of the Customer may differ based on the specific requirements, The Company remains the data processor and the Customer is responsible to provide adequate privacy notices.

**The Customer has complete control over the Personal Data and the Company processes the Personal Data on the Customer's behalf.**

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We will process the Personal Data for as long as we provide Services to the Customer and the Customer maintains active accounts of such Users.

## 4. ACCURACY OF INFORMATION

The User undertakes that he/she shall be solely responsible for the accuracy, correctness, or truthfulness of the Personal Information shared with us whether of its own or any third party. In the event the User is sharing any Personal Information on behalf of a third person, the User represents and warrants that he/she has the necessary authority to share such Personal Information with the Company, and the User has obtained written consent from such third party, and the Company shall not be responsible for verifying the same. The User understands and acknowledges that such Personal Information shall be subject to the terms and conditions of this Privacy Notice.

## 5. HOW DO WE USE PERSONAL DATA?

We use the Personal Information for the following purposes:

i. to inform you about our Services and to respond to your requests;

ii. to provide you with a better experience when you access our Platform and to improve the Services;

iii. to maintain and manage our Platform;

iv. to manage our relationship with you;

v. for internal record keeping;

vi. and to comply with our legal or statutory obligations.

## 6. DISCLOSURES

We do not sell, rent, share, distribute, lease or otherwise provide your Personal Information to third parties, without your prior consent. Keeping this in mind, we may disclose your Personal Data in the following cases:

i. **Affiliates:** We may provide your Personal Information to our affiliates to enable them to improve the Services, provide feedback and respond to their queries.

ii. **Service Providers:** We may share your Personal Information with the service providers who work with us in connection with operating the Platform and/or providing the Services. All such service providers are subject to stringent confidentiality restrictions consistent with this Privacy Notice.

iii. **Merger or Acquisition:** We may transfer your Personal Information if we are acquired by another entity, or if we merge with another company or transfer a part of our business, including the Platform, to a third party. Any third party or resultant entity that receives your Personal Information shall have the right to continue to use your Personal Information in line with the purposes set out herein.

iv. **Safety, Legal and Regulatory Authorities:** We may disclose your Personal Data if we believe that we are required to do so: (a) by law; (b) to comply with legal process or governmental requests; (c) to enforce our agreements; (d) to protect our operations; (d) to protect the rights, privacy, safety or property of the Company, you or others; (e) to protect our reputation and (f) to permit us to pursue available remedies or limit the damages that we may sustain.

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## 7. DATA RETENTION

We will retain User's Personal Information as long as it is required to be retained for the purpose of provision of the Services on our Platform. We may also retain and use User's Personal Information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## 8. HOW WE SECURE YOUR PERSONAL DATA?

We are committed to maintaining information security and protecting Personal Information from potential breaches. We implement appropriate technical safeguards such as encryption and network security controls.

Although we provide appropriate firewalls and protections, we cannot warrant the security of Personal Information transmitted as these systems are not hack proof. Data pilferage due to unauthorized hacking, virus attacks, technical issues is possible, and we will take necessary measures to mitigate such events.

You agree to immediately notify the Company in writing by email to info@apexon.com of any unauthorized use of your account or any other breach of security.

## 9. YOUR PRIVACY RIGHTS

Depending on your location and applicable data protection law, you may have certain rights regarding your Personal Information, including but not limited the right to:

i. Request access to Personal Information we hold about you;

ii. Request correction of inaccurate Personal Information;

iii. Request deletion of Personal Information, subject to legal exceptions;

iv. Object to or restrict certain processing activities;

v. Withdraw consent, where processing is based on consent; and

vi. Request information about categories of Personal Information disclosed for business purposes.

These rights may be subject to limitations and exceptions under applicable law. To exercise your rights, please write to us at info@apexon.com. For more information on jurisdiction specific rights, please refer to the sections below.

## 10. ADDITIONAL INFORMATION FOR RESIDENTS OF INDIA

This section applies to individuals located in India and supplements the information provided elsewhere in this Privacy Policy. It is intended to comply with the Digital Personal Data Protection Act, 2023 and Digital Personal Data Protection Rules, 2025 (collectively "**DPDPA**").

You have the following rights that can be exercised:

i. Right to access information about Personal Data.

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ii. Right to correction and erasure of Personal Data.

iii. Right of grievance redressal.

iv. Right to nominate.

v. Withdraw consent at any time where we are relying on consent to process Personal Data.

For ease of reference, we have provided an itemized table of how we collect and use the Personal Information:

| Categories of Personal Information | Specified Purpose(s) of Processing |
|---|---|
| **Information You provide to us**<br><br>(Name, email address, username, password) | • To provide you Services;<br>• To establish and manage business relationships;<br>• To communicate with you;<br>• For internal record keeping;<br>• To comply with applicable legal and regulatory requirements. |

Depending on the nature of the request, we may ask you to complete a Personal Data request form or seek certain details to verify the request.

All requests for Personal Data will be handled within a reasonable period of time. If you would like to exercise ANY of these rights, please contact info@apexon.com

To exercise your rights or submit a grievance request, please write to us at info@apexon.vom. We may request information necessary to verify your identity before responding to your request. Ater exercising your rights with us, if your grievance remains unresolved, you may approach the Data Protection Board of India, as prescribed under DPDPA.

## 11. ADDITIONAL INFORMATION FOR RESIDENTS OF EUROPEAN UNION AND UNITED KINGDOM

This section applies to Users located in the European Union ("**EU**") and United Kingdom ("**UK**"). It supplements the information provided elsewhere in this Privacy Notice and is intended to comply with the EU General Data Protection Regulation (the "**GDPR**") and the UK GDPR, the United Kingdom Data Protection Act 2018, the Privacy and Electronic Communications Regulations, and any regulation superseding any of the foregoing ("**UK Privacy Laws**"). As per the provisions of the GDPR and UK Privacy Laws we shall be considered the Processors of the Personal Data collected as a result of your use / access of the Platform and the Service.

**Legal Basis of Processing (for EU residents and UK residents):** We will not process your Personal Data without a lawful basis to do so. We will process your Personal Data only on the legal basis of consent, contract, or on the basis of our legitimate interests or for compliance with legal obligations, provided that such interests are not overridden by your privacy rights and interests.

**Transfer of your personal information across borders (for EU Residents):** Personal Data may be transferred to and processed in countries outside the EU or UK. Where such transfers occur, we implement appropriate safeguards in accordance with applicable data protection

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laws. You may contact us for more information about the safeguards we apply to international transfers.

**Your Rights (For EU and UK Residents):**

You have the right to request us:

i. to let you know what Personal Data belonging to you,

ii. we hold in our possession,

iii. withdraw consent at any time where we are relying on consent to process your Personal Data,

iv. right to have us rectify or modify any such Personal Data,

v. right to have us erase/delete your Personal Data,

vi. right to restrict us from processing such Personal Data,

vii. right to object to our use of your Personal Data,

viii. you have the right to lodge a complaint with a data protection authority.

To exercise your rights, please contact us at info@apexon.com. We may request information to verify your identity before responding to your request.

If you are located in the UK, you have the right to lodge a complaint with the Information Commissioner's Office (ICO). If you are located in the EU, you may lodge a complaint with your local supervisory authority. We encourage you to contact us first so that we may address your concerns.

**Governing Laws**: For any EU and UK residents, this Privacy Notice shall be governed respectively by the provisions of the GDPR and UK Privacy Laws.

## 12. ADDITIONAL INFORMATION FOR RESIDENTS OF CALIFORNIA

In addition to disclosures made elsewhere in this Privacy Notice, certain states in the United States of America require us to disclose information related to our privacy practices. This section of our Privacy Notice ("**California Privacy Notice**") serves to comply with the California Consumer Privacy Act of 2018 ("**CCPA**"), as amended by the California Privacy Rights Act ("**CPRA**") (collectively, "**CCPA**"), and any capitalized terms defined in the CCPA have the same meaning when used in this Section.

The CCPA provides consumers with specific rights regarding their Personal Information. This section describes those state-specific rights and explains how to exercise those rights. The section will not apply if we do not collect Personal Information about you or if the Personal Information that we collect, is exempted from the CCPA and CPRA.

For the purpose of this section, "**Personal Information**" shall mean information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

**California-Specific Disclosures**

We may disclose Personal Information to service providers and affiliates for business purposes as described in this Privacy Policy.

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We do not sell Personal Information. We do not share Personal Information for cross-context behavioral advertising purposes. We do not use or disclose Sensitive Personal Information for purposes other than those permitted by the CCPA.

**Your California Privacy Rights:**

The California rights set forth below apply to all visitors, Users, and others regardless of place of residence.

i. Request to know the categories and specific pieces of Personal Information we have collected about them;

ii. Request deletion of Personal Information collected from them;

iii. Request correction of inaccurate Personal Information;

iv. Request information about categories of Personal Information disclosed for business purposes.

v. Request to limit our use of sensitive Personal Information (if any) unless our use of sensitive Personal Information falls into one of limited business purposes;

vi. Request to Opt-Out of sale or sharing of Personal Information processing for targeted advertising, personal data sales, or advertising, personal data sales or advertising for cross context behavioral advertising purposes.

## 13. CHOICE AND OPT-OUT

We may send you communications including but not limited to (a) notices about your use of our Platform and Services provided on our Platform, including those concerning violations of use, (b) updates, (c) promotional information regarding our services, and (d) newsletters. You may opt out of receiving promotional emails and newsletters from us by following the unsubscribe instructions provided in those emails. Alternatively, you can opt out, at any time, by emailing info@apexon.com with your specific request.

## 14. LINKS TO OTHER WEBSITES/ PLATFORMS

Our Platform may contain links to other websites/platforms/applications of your interest. Please note that we do not have any control over such other websites/platforms/applications, and you will be accessing these websites/ platforms/applications at your own risk. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such websites/platforms/applications and those are not governed by this Privacy Notice. You should exercise caution and look at the privacy Notice applicable to such websites/platforms/applications.

## 15. GOVERNING LAWS

This Privacy Notice shall in all respects be governed by and construed and enforced in accordance with the laws of Delaware and the competent courts in California shall have an exclusive jurisdiction to adjudicate any subject matter under this Privacy Notice.

## 16. CHANGES TO THIS NOTICE

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Please revisit this Privacy Notice periodically to stay aware of any changes to this Privacy Notice, which we may update from time to time. If we modify this Privacy Notice, we will make it available through the Platform and indicate the date of the latest revision. If such modifications materially alter your rights or obligations hereunder, we will make reasonable efforts to notify you of the change via email or through our Platform.

## 17. CONTACT US

If you have any questions or concerns or grievances regarding this Privacy Notice or wish to withdraw your consent in relation to the processing of your Personal Data you can reach out to our appointed grievance redressal officer at info@apexon.com

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