

Privacy Policy

Controller: Focure Inc. (“Focure,” “we,” “us”)

Effective date: July 23rd, 2026

Last updated: July 23rd, 2026

This Privacy Policy explains how Focure Inc., a Delaware corporation with its principal place of business at **108 West 13th Street, Wilmington, Delaware 19801, County of New Castle, USA** (“Focure,” “we,” “our,” or “us”), collects, uses, discloses, and protects personal information when you visit **autofocals.ai** (the “Site”), join our wishlist or newsletter, or contact us through the Site as an optometry partner or otherwise (collectively, the “Services”).

This Policy applies globally. If you are located in the European Economic Area (EEA), the United Kingdom, or California, additional terms apply to you and are set out below.

1. Who We Are and How to Contact Us

Data controller: Focure Inc., 108 West 13th Street, Wilmington, Delaware 19801, County of New Castle, United States.

Privacy contact: info@fuller.vision

EU/UK Representative (Article 27 GDPR): [NAME AND ADDRESS OF EU/UK REPRESENTATIVE – TO BE APPOINTED]

2. Information We Collect

We collect the following categories of personal information:

2.1 Information you provide to us

- **Wishlist signups:** name, email address, country.
- **Newsletter signups:** email address only.
- **Optometry partner / contact form:** name, email address, country, company or practice name (if provided), and the content of your message.
- **Other communications:** if you email us directly, any information you choose to include.

2.2 Information collected automatically

When you visit the Site, we and our service providers automatically collect certain information through cookies, pixels, and similar technologies, including:

- IP address and approximate location derived from it;
- Device, browser, and operating system information;
- Referring URL, pages viewed, links clicked, time spent, and other usage data;
- Unique identifiers assigned by analytics and marketing tools.

We do not knowingly collect special categories of personal data (e.g., health, biometric, or precise geolocation data) through the Site.

3. How We Use Your Information and Legal Bases

We process personal information for the purposes below. Where the GDPR or UK GDPR applies, we identify the legal basis we rely on:

- **Operating the wishlist.** To register your interest in Autofocals, notify you when the product becomes available, and gauge demand by region. **Legal basis:** consent (Art. 6(1)(a)) and our legitimate interest in commercializing our product (Art. 6(1)(f)).
- **Sending newsletters and marketing emails.** To send updates about Focure, Autofocals, and related news. **Legal basis:** consent (Art. 6(1)(a)). You can withdraw consent at any time using the unsubscribe link in any email.
- **Responding to partner inquiries.** To evaluate and respond to optometry partner outreach and manage collaboration opportunities. **Legal basis:** legitimate interest (Art. 6(1)(f)) in pursuing business relationships, and pre-contractual measures at your request (Art. 6(1)(b)).
- **Operating, securing, and improving the Site.** To monitor performance, prevent abuse, and analyze how visitors use the Site. **Legal basis:** legitimate interest (Art. 6(1)(f)); consent (Art. 6(1)(a)) for non-essential cookies.
- **Complying with legal obligations.** To respond to lawful requests and enforce our terms. **Legal basis:** legal obligation (Art. 6(1)(c)) and legitimate interest (Art. 6(1)(f)).

We do not use your personal information for automated decision-making that produces legal or similarly significant effects.

4. Cookies and Similar Technologies

We use cookies and similar technologies to operate the Site, remember your preferences, and understand how the Site is used. Categories include:

- **Strictly necessary cookies** required for the Site to function (e.g., load balancing, security).
- **Analytics cookies** set by Google Analytics 4 to measure traffic and usage.
- **Marketing and CRM cookies** set by HubSpot (e.g., __hstc, hubspotutk, __hssc) to attribute visits, distinguish unique visitors, and link form submissions to your browsing session.

Where required (e.g., in the EEA and UK), we will request your consent for non-essential cookies through a cookie banner before they are set. You can change or withdraw your consent at any time through the cookie preferences link on the Site, and you can also control cookies through your browser settings.

5. How We Share Personal Information

We share personal information only as described below. We do not sell personal information for monetary consideration.

5.1 Service providers (processors)

We share personal information with vendors that process it on our behalf under written data processing agreements:

- **HubSpot, Inc. (US)** — form capture (wishlist, newsletter, partner contact), CRM, and marketing email sending.
- **Google LLC (US)** — Google Analytics 4 for Site analytics.
- **Hetzner** — Site hosting and content delivery.
- **info@fuller.vision** — transactional email and inbound mail handling.

5.2 Legal, safety, and business transactions

We may disclose personal information when we believe in good faith that disclosure is necessary to comply with law, enforce our terms, protect the rights, safety, or property of Focure or others, or in connection with a merger, acquisition, financing, or sale of assets, in which case we will require the recipient to honor this Policy.

5.3 With your consent

We may share personal information for any other purpose disclosed to you at the time of collection or with your consent.

6. International Data Transfers

Focure is based in the United States. When you provide personal information to us, it is transferred to and processed in the United States and may be accessed by our service providers in other countries. These countries may not provide the same level of protection as your home jurisdiction.

For transfers of personal data from the EEA, UK, or Switzerland to the United States, we rely on one or more of the following safeguards:

- **EU-US Data Privacy Framework (DPF), the UK Extension, and the Swiss-US DPF** where the recipient is certified (e.g., HubSpot and Google are listed on the DPF — to be verified on the official DPF list before publication);
- **Standard Contractual Clauses** (Module 2 or 3, as applicable) adopted by the European Commission, together with supplementary measures where necessary;
- **UK International Data Transfer Addendum** for transfers subject to the UK GDPR.

You can request a copy of the safeguards we rely on by emailing **info@fuller.vision**.

7. How Long We Keep Your Information

We retain personal information only as long as necessary for the purposes set out in this Policy, including to comply with our legal, accounting, or reporting obligations. Indicative retention periods:

- **Wishlist data:** until commercial launch of Autofocals plus twelve (12) months, or until you unsubscribe or request deletion, whichever is earlier.
- **Newsletter subscribers:** until you unsubscribe or request deletion, plus a short suppression record to honor your opt-out.
- **Partner contact form submissions:** up to three (3) years from last contact, or longer where required to manage an ongoing partner relationship.

- **Analytics and log data:** up to fourteen (14) months in Google Analytics 4 (configurable); web server logs for a shorter period for security purposes.

When retention periods expire, we delete or anonymize personal information.

8. Your Rights (EEA, UK, and Switzerland)

If you are in the EEA, UK, or Switzerland, you have the following rights, subject to applicable law:

- **Access** — obtain a copy of the personal data we hold about you.
- **Rectification** — ask us to correct inaccurate or incomplete data.
- **Erasure** — ask us to delete your personal data.
- **Restriction** — ask us to limit how we process your data.
- **Portability** — receive your data in a structured, machine-readable format.
- **Objection** — object to processing based on legitimate interests or for direct marketing.
- **Withdraw consent** — withdraw any consent you previously gave, without affecting prior lawful processing.
- **Lodge a complaint** — with your local supervisory authority (e.g., the UK ICO or your national EU data protection authority).

To exercise any of these rights, contact us at info@fuller.vision. We will respond within the timeframes required by applicable law.

9. Your Rights (California)

If you are a California resident, the California Consumer Privacy Act (CCPA), as amended by the CPRA, grants you the following rights:

- **Right to know** the categories and specific pieces of personal information we have collected about you, the sources, the purposes, and the categories of third parties we shared it with.
- **Right to delete** personal information we have collected from you, subject to exceptions.
- **Right to correct** inaccurate personal information.
- **Right to opt out** of the sale or sharing of personal information for cross-context behavioral advertising. Focure does not sell personal information for monetary consideration. We may “share” personal information for cross-context behavioral advertising as defined under the CPRA where marketing cookies are set; you can opt out via our cookie preferences or by emailing us.
- **Right to limit** the use of sensitive personal information (we do not collect sensitive personal information for purposes that would trigger this right).
- **Right to non-discrimination** for exercising any of these rights.

Categories of personal information collected in the past 12 months (CCPA categories): identifiers (name, email, IP address); commercial information (interest in our products); internet activity (Site usage); geolocation (country, approximate location from IP); inferences drawn from the above. Sources: directly from you and automatically from your device. Purposes: as described in Section 3. Categories of recipients: as described in Section 5.

To submit a request, email **info@fuller.vision**. We will verify your request using the email address associated with your account or submission. You may designate an authorized agent to act on your behalf with written authorization.

10. How We Protect Your Information

We use reasonable administrative, technical, and physical safeguards designed to protect personal information against unauthorized access, disclosure, alteration, and destruction, including encryption in transit (TLS), access controls, and vendor security reviews. No system is fully secure; we cannot guarantee absolute security.

11. Children's Privacy

The Services are not directed to children under 16, and we do not knowingly collect personal information from children. If you believe a child has provided us with personal information, please contact us at info@fuller.vision and we will take appropriate steps to delete it.

12. Marketing Communications

Every marketing email we send includes an unsubscribe link. You can opt out at any time by clicking that link or by emailing info@fuller.vision. Even after you opt out of marketing, we may continue to send transactional or relationship messages (for example, replies to a partner inquiry).

13. Changes to This Policy

We may update this Policy from time to time. When we do, we will update the "Last updated" date above and, for material changes, provide additional notice (such as a banner on the Site or an email to subscribers). Your continued use of the Services after the effective date of the updated Policy constitutes your acceptance of the changes, except where additional consent is required by law.

14. How to Contact Us

Focure Inc. — 108 West 13th Street, Wilmington, Delaware 19801, County of New Castle, United States

Email: info@fuller.vision

EU/UK Representative (Article 27): [NAME AND ADDRESS – TO BE APPOINTED]