

HALRON

Essential Edition for Mac

Privacy Notice

Global notice with European and Middle East regional provisions

HALRON Privacy Notice

Effective date: 7 September 2026

A LOCAL-FIRST PRODUCT

HALRON runs supported AI models on your Mac. During ordinary local inference, your prompts, model responses, Sessions, Notebooks and local attachments are

processed on your device and are not sent to Floating Point. Network activity is used for licence operations, model downloads that you explicitly authorise, and the optional automatic News & Announcements check described below.

1. Who we are and what this notice covers

Floating Point FZE LLC, trading as Floating Point ("Floating Point", "we", "us" or "our"), is the controller responsible for the personal data described in this notice, except where a named third party acts as an independent controller for its own purposes. Item Details Legal name Floating Point FZE LLC Licence number 2626010497888 Tax registration number 105405130300001 Registered address CWS-1V-224650, 26th Floor, Amber Gem Tower, Ajman, United Arab Emirates Privacy contact customerservice@floatingpoint.tech This notice applies to HALRON Essential Edition for Mac, the associated Lemon Squeezy checkout and licensing workflow, and support communications controlled by Floating Point. Use of HALRON is governed by the HALRON End User Licence Agreement, which includes the adults-only eligibility requirement. Lemon Squeezy and Hugging Face publish separate privacy notices for processing they control independently.

2. The short version

Local AI content stays on your Mac during ordinary local inference. Floating Point does not receive it merely because you use HALRON. Lemon Squeezy processes purchase, payment, tax, fraud-prevention and licence information. Floating Point can access limited customer, order and licence records through its seller account. HALRON sends a licence key and an installation identifier or installation name to Lemon Squeezy when you validate, activate or deactivate a licence. HALRON contacts huggingface.co only after you approve a model download. Hugging Face may receive ordinary network and request information under its own privacy policy. After legal consent, HALRON may contact a signed public News & Announcements endpoint operated through Cloudflare once at each application startup and when you explicitly choose Check Now. Cloudflare may process the IP address and ordinary request metadata. The request contains no licence key, customer identifier, prompts, outputs, Sessions, Notebook names, attachment names, filenames, installed-model inventory or customer files. Automatic checks can be disabled in Settings. HALRON does not include first-party advertising or cross-app tracking. The inspected product configuration does not automatically upload prompts, outputs or diagnostic bundles to Floating Point. You may have rights to access, correct, delete, restrict, object to, or obtain a portable copy of personal data, depending on your location and the legal basis used.

3. Personal data and product data

"Personal data" means information relating to an identified or identifiable person. HALRON also stores product data locally that may be personal or confidential even when Floating Point never receives it. Category Examples Where it goes Prompts, responses, Sessions, Notebook names and content, attachment Local AI and workspace content names and content, local file references, Reader content, model preferences Stored

and processed on your Mac during ordinary local inference. Not received by Floating Point unless you choose to send material for support. and exported files. Name, email address, billing country/region, order, price, currency, tax, Purchase and customer data refund and transaction status. Payment-card details are handled by Lemon Squeezy and its payment providers. Licence key, licence status, product/store/variant association, installation Licence data identifier, installation name, activation count, timestamps and vendor response status. Collected by Lemon Squeezy as Merchant of Record. Floating Point can access seller-facing customer and order records but does not receive full card details. Sent to api.lemonsqueezy.com for validation, activation and deactivation. The full key and installation identifier are also stored locally in HALRON's environment-separated credential record. Requested model repository and revision, download status, acknowledgement Model-download data of model terms, and ordinary network information such as IP address and request metadata. Support and correspondence Marketing preferences Your name, email, message, and any screenshots, logs, diagnostic information or files you choose to provide. Email address, subscription status, consent record and unsubscribe state, if you opt in. Agreement acceptance records Licence-agreement version, privacy-notice version, adult-eligibility confirmation, acceptance timestamp and app version. The acknowledgement and download state are stored locally. Requests are made to huggingface.co only after explicit authorisation; Hugging Face independently receives network requests. Received only when you contact us or intentionally send material. Do not send prompts, licence keys, confidential files or special-category data unless necessary and requested through an approved channel. Used separately from purchasing and licensing. Marketing consent is optional and can be withdrawn. Stored locally on your Mac as part of the product's controlled records; not transmitted to Floating Point. Used to evidence contract formation and eligibility (legal basis: contract; legitimate interests in establishing and defending legal claims).

4. Why we use personal data and our legal bases

The legal basis depends on the activity and your location. For EU/EEA and UK individuals, the bases below refer to Article 6 of the GDPR or UK GDPR. In the UAE and other Middle East jurisdictions, we rely on consent and the other lawful grounds available under applicable local law, including processing necessary to perform a contract, comply with law, protect security, or establish and defend legal rights. Purpose What we do Basis Provide the product and licence Issue, validate, activate, deactivate and support your licence; deliver purchase communications. Contract; steps requested before contract. Process orders and meet legal Payment, tax, invoicing, refunds, accounting, sanctions and fraud prevention, primarily through Contract; legal obligation; legitimate interests in preventing fraud duties Lemon Squeezy as Merchant of Record. and protecting the service. Provide user-authorized model Connect to the repository and download the selected immutable model revision after downloads acknowledgement. Security and service integrity Investigate misuse, protect accounts and licences, enforce terms, preserve evidence and respond to incidents. Support Respond to questions, troubleshoot issues and retain a record of the resolution. Contract and your explicit request. Legitimate interests; legal obligation; establishment or defence of legal claims. Contract; legitimate interests in customer service and product reliability. Marketing Send product news or offers only where you have separately opted in or another lawful route clearly applies. Consent, normally. You may withdraw it at any time. Legal and corporate matters Comply with regulators, courts or law enforcement; manage claims, audits, restructuring or a Legal obligation; legitimate interests; legal claims. business transfer. Our legitimate interests are operating and securing HALRON, preventing fraud and licence abuse, supporting customers, maintaining business records and defending legal rights. We assess whether these interests are necessary and proportionate and whether your rights override them. You may object to processing based on legitimate interests.

5. Where personal data comes from

Directly from you when you purchase, enter a licence key, contact support or opt in to marketing. From Lemon Squeezy when it makes seller-facing customer, order, receipt, refund and licence information available to us. From HALRON licence operations, which create or update licence status and installation records. From your device or communication only when you intentionally send us diagnostic or support material.

6. Local processing, optional downloads and diagnostic information

6.1 Local AI content HALRON is designed for local model inference. Ordinary prompts, responses, Sessions, Notebooks and local attachments are processed on your Mac. Floating Point cannot access that content

through the product's ordinary local inference path. You control local deletion and export. Removing the application may not automatically delete all data stored in your macOS Application Support folders; use HALRON's deletion/reset controls and verify retained files when retiring a device.

6.2 Model downloads Before HALRON contacts huggingface.co for a curated model, it requires an explicit acknowledgement of the model terms and authorisation for the network download. Hugging Face acts independently for its service and may process IP address, device/request information and any account information under its privacy policy. HALRON does not send your local prompts or model responses as part of the model download request.

6.3 Diagnostics and support bundles HALRON does not automatically upload a support bundle to Floating Point. If you choose to export or send diagnostic material, review it first. Diagnostic material may identify the app version, macOS and hardware characteristics, model identifiers, request status, timing, memory observations, error details and filenames. The product is designed to exclude complete licence keys and installation identifiers from diagnostics, backups and logs; nevertheless, you should not send a licence key or confidential content by email.

6.4 News & Announcements After legal consent, HALRON may make one asynchronous request at each application startup. Additional requests occur only when you explicitly choose Check Now. The endpoint returns the same signed, non-personalized public feed to all customers. HALRON stores announcement history, read state and per-message suppression locally. No read receipt is sent. You can disable automatic startup checks in Settings and continue to open the local history from Help. Service or network failure never blocks ordinary HALRON use.

7. Who receives personal data

Recipient Role/purpose Location Lemon Squeezy / Sold through Merchant of Record for checkout, payment, tax, refunds and fraud controls; processor for certain seller customer and United States and other locations Link, LLC licence data; independent controller where it determines its own legal purposes. described by Lemon Squeezy. Hugging Face, Inc. and Hosts model repositories requested by the user. Receives download requests and ordinary network metadata under its own United States, France and other service Hugging Face SAS privacy policy. locations. Cloudflare, Inc. Delivers the signed, non-personalized News & Announcements feed and media. Receives IP address and standard HTTPS request metadata; receives no HALRON licence or workspace content. Processing locations and safeguards are described in Cloudflare's privacy and data-protection terms. Professional advisers and service providers Legal, accounting, security or support providers where necessary and bound by confidentiality and data-protection terms. Only as required for the service or legal duties. Authorities and courts Where disclosure is required by applicable law, valid legal process, or necessary to establish, exercise or defend legal rights. Relevant jurisdiction. Successor organisation A buyer, investor or successor in a merger, reorganisation or sale, subject to appropriate confidentiality and legal safeguards. Relevant transaction location. We do not sell local HALRON workspace content or use it for targeted advertising. We do not disclose personal data to a recipient merely because it asks; disclosures must have a valid purpose and legal basis.

8. International transfers

Floating Point is established in the United Arab Emirates. Lemon Squeezy is established in the United States, and model-download requests may be handled in the United States, France or other service locations. Therefore, personal data may be transferred outside your country and, for EU/EEA or UK users, outside the EEA or UK. Where transfer restrictions apply, we use a recognised legal mechanism appropriate to the relationship, such as an adequacy decision, approved standard contractual clauses, the UK International Data Transfer Addendum or another permitted safeguard. Lemon Squeezy's published Data Processing Agreement states that EEA transfers will, unless otherwise agreed, rely on EU-approved Standard Contractual Clauses. You may request information about the applicable safeguards by contacting us. No transfer mechanism eliminates all risk. We also apply data minimisation, access controls, confidentiality and security measures appropriate to the data and purpose.

9. How long we retain data

Record Retention period or criteria Local workspace and model data Until you delete it. It remains under your device account and backup practices. Uninstalling the app may not remove all Application Support data. Local licence credential and While the licence remains configured on the device. Confirmed deactivation removes the local credential and associated metadata. Ordinary reset and backup/export metadata workflows are designed not to expose the credential. Customer, order, invoice and refund For the time required to fulfil the purchase, handle disputes, prevent fraud and meet applicable tax, accounting and legal-retention duties. Lemon Squeezy records separately applies its own retention policy as Merchant of Record. Licence-service records For the life of the licence and for the additional period reasonably needed to manage activation limits, security, disputes and legal claims. Support correspondence Until the issue is resolved and thereafter only for the period reasonably needed for follow-up, security, product quality and legal claims. Unnecessary attachments should be deleted or de-identified earlier. Marketing records Until you unsubscribe or withdraw consent, plus a minimal suppression record so that we can respect your opt-out.

10. Security

We use measures appropriate to the nature of the processing, including data minimisation, access controls, contractual confidentiality, HTTPS network requests and local file protections. The HALRON licence credential is stored in an environment-separated record in the signed-in user's Application Support area with owner-only permissions; it is not separately encrypted or stored in the macOS Keychain. Protect your macOS account, enable disk encryption where appropriate, and do not share your licence key. No electronic storage or transmission method is completely secure. If we identify a personal-data breach, we will assess and notify affected individuals and competent authorities where applicable law requires it.

11. Your choices

You decide whether to authorise each model download after reviewing the applicable model terms. You can disable automatic News & Announcements checks in Settings without affecting ordinary use. You may choose not to provide purchase or licence data, but then we may be unable to issue or validate a licence or provide the product. Marketing is separate from purchasing. You can unsubscribe through the message facility or contact us. You decide whether to send support screenshots, logs or diagnostic material. Remove unnecessary personal or confidential content first.

12. Your privacy rights

Depending on your location and the processing, you may have the right to: receive information about processing and obtain access to personal data we hold about you; correct inaccurate or incomplete data; request deletion or erasure where the law permits; restrict or stop certain processing; object to processing based on legitimate interests and object at any time to direct marketing; receive data you provided in a structured, commonly used, machine-readable format and request transfer where technically feasible; withdraw consent at any time without affecting processing already carried out lawfully; request review of a solely automated decision that has legal or similarly significant effects; and complain to a competent data-protection authority or seek another remedy available under local law.

RIGHT TO OBJECT

If we process your personal data on the basis of legitimate interests, you may object for reasons relating to your situation. You may object to direct marketing at any time. We will stop direct marketing and will stop other objected-to processing unless we demonstrate compelling lawful grounds or need the data for legal claims.

12.1 How to exercise a right Email customerservice@floatingpoint.tech with the subject "Privacy request". Describe the request and the product or transaction involved. We may verify your identity proportionately and may ask for authority if you act for another person. We will respond within the period required by the law that applies to you. Rights are not absolute; if an exception applies, we will explain it unless prohibited by law. For data controlled independently by Lemon Squeezy or Hugging Face, submit the request directly to that provider. We will assist or forward a request where legally required and technically possible.

13. Automated licence decisions

HALRON automatically evaluates licence-service responses to determine whether the product may be activated or remain active on a device. The logic checks whether the key is valid, whether it belongs to the approved product/variant and whether the activation limit is available. A rejection can prevent or limit product access, but it is not used for advertising, credit, employment or behavioural profiling. Contact us if you believe a licence decision is wrong and want human review.

14. Adults only

HALRON is licensed and offered exclusively to adults who are at least 18 years old and have reached the age of majority where they live, as stated in the End User Licence Agreement. HALRON is not directed to children or minors, and we do not knowingly collect personal data from anyone under 18. If we learn that personal data of a minor has been collected (for example through a purchase or support request), we will delete it and may cancel the associated licence. Do not send us a child's personal data.

15. Changes to this notice

We may update this notice when HALRON, our vendors or legal requirements change. We will publish the updated date and, where a change materially affects your rights or an existing purpose, provide additional notice or obtain consent when required. A new purpose will not be treated as compatible merely because it is added to this notice.

16. Contact and complaints

Contact Floating Point first so we can investigate: customerservice@floatingpoint.tech. You may also complain to the authority identified in the regional section below or another authority competent where you live, work, or believe a violation occurred.

Regional provisions

These provisions supplement the global notice. If they conflict, the provision that gives you the protection required by the law applicable to the processing will control.

A. European Union and European Economic Area

Controller: Floating Point FZE LLC in the United Arab Emirates. Legal bases: contract, legal obligation, legitimate interests and consent as described in section 4. Rights: access, rectification, erasure, restriction, portability, objection, consent withdrawal, and protection concerning solely automated significant decisions, subject to GDPR conditions and exceptions. Complaint: you may complain to the data-protection authority where you habitually reside, work, or where the alleged infringement occurred. Non-EEA transfers: see section 8. You may request a copy or description of the relevant safeguard. EU representative: Floating Point must complete and publish the Article 27 representative assessment before intentionally targeting EU/EEA customers. If a representative is appointed, its identity and contact details will be inserted here and at the point of collection.

B. United Kingdom

The UK GDPR and Data Protection Act 2018 may apply where HALRON is offered to people in the UK. You have rights broadly corresponding to those described in section 12, subject to UK law and the applicable legal basis. Complaint: Information Commissioner's Office (ICO), ico.org.uk/make-a-complaint. UK representative: Floating Point must complete and publish the UK representative assessment before intentionally targeting UK customers. If a representative is appointed, its identity and contact details will be inserted here and at the point of collection. Restricted transfers from the UK will use a lawful UK mechanism, which may include the UK Addendum to EU Standard Contractual Clauses or the International Data Transfer Agreement where appropriate.

C. United Arab Emirates

Floating Point is established in Ajman, UAE. Subject to the scope and exceptions of Federal Decree-Law No. 45 of 2021 Concerning the Protection of Personal Data, UAE individuals may request information about processed data, purposes, sharing, retention criteria, automated decisions, cross-border safeguards and complaint procedures; request correction or erasure; request portability where the statutory conditions apply; and request restriction or cessation of processing. Processing and cross-border transfers will be handled under a lawful basis and applicable safeguards. Complaints may be made to the UAE Data Office or other competent body when its complaint channel is available and applicable.

D. Saudi Arabia

Where the Saudi Personal Data Protection Law applies, including to processing outside the Kingdom concerning individuals residing in the Kingdom, we will provide the information required by that law, use an applicable legal basis, honour statutory rights, apply security and breach controls, and use a permitted mechanism for transfers outside the Kingdom. Saudi-specific registration, representative, DPO, transfer-assessment or localisation duties must be assessed before a targeted Saudi launch or material scale-up.

E. Bahrain

Where Bahrain's Personal Data Protection Law No. 30 of 2018 applies, we will process personal data fairly and lawfully, provide required information, respect applicable access, correction, blocking, erasure and objection rights, and comply with restrictions or approvals governing transfers outside Bahrain. Any notification, representative or permit requirement must be assessed before targeted Bahraini processing.

F. Qatar

Where Qatar Law No. 13 of 2016 on Protecting Personal Data Privacy applies, we will follow applicable notice, consent or other lawful- processing, privacy-by-design, security and data-subject-rights requirements. Any sectoral requirements and cross-border conditions must be confirmed before targeted Qatari processing.

G. Oman

Where Oman's Personal Data Protection Law under Royal Decree 6/2022 and its Executive Regulation apply, we will use a lawful basis, provide required information, respect applicable rights, maintain controller-processor terms and security measures, and comply with any authorisation, registration, breach or cross-border-transfer obligations. These requirements must be assessed before targeted Omani processing.

H. Other European and Middle East jurisdictions

This notice is written to provide a transparent global baseline, but Europe and the Middle East contain additional national, free-zone and sector- specific regimes. Before actively targeting a country not specifically addressed above, Floating Point will assess any additional local-language notice, consent, registration, representative, localisation, marketing, consumer-protection or transfer requirement. This notice does not override mandatory local law.

Appendix A — Vendor and network-service register

Provider Purpose Data Location Safeguard/status Checkout, Merchant of Record, tax, Lemon Squeezy / Sold through Link, LLC payment, fraud, refunds and licence Customer/order data; licence key; installation ID/name; activation status United States; other locations in its notice API DPA; EU SCCs stated for EEA transfers; provider privacy notice Hugging Face, Inc. / Hugging Face SAS Email/support provider User-authorized model repository and downloads Receive privacy and support communications Requested repository/revision; IP address and standard request metadata; account data if user signs in separately Sender, email address, message and attachments United States, France and other service locations To be confirmed and published before release Provider terms and privacy notice; transfer position to be reviewed for final launch Processor terms and transfer mechanism to be confirmed