

Privacy Notice

The Privacy Notice outlines how we collect, use, and disclose your personal data when you use the Computools Service (our website). It also details your privacy rights and provides guidance on how to exercise them.

What Personal Data do we receive?

Personal data refers to any information that can identify you as an individual. We collect the following categories of personal data when you use our website:

- **Contact Information:** If you submit an inquiry, subscribe to a newsletter, or contact us, we may collect your name, email address, phone number, and other contact details you voluntarily provide.
- **Usage Information:** We collect data about your interactions with our website — pages you visit, time spent on the site, search queries, and other actions to help improve our services.
- **Device Information:** We receive information about the devices you use to access the website, such as device type, operating system, IP address (to estimate general location), browser type, and other technical details.
- **Content from Collaboration Tools:** If collaboration or communication features are available on the site, we may collect related content (messages, files, etc.), which is not used without your consent.

Where do we collect personal data?

We receive your personal data from the following sources:

- **Directly from You:** When you submit an inquiry, contact us, or participate in surveys, you provide personal data, contact information, and messages which we collect.
- **From Partners:** We may collect personal data from third parties (“Partners”) whose services you use to access, pay for, or interact with our website. This may include contact details, payment information, usage data, and device information.
- **From Public Sources:** We may collect data from public sources such as social media posts (e.g., mentions, likes, or shares of our content) and other publicly available databases, in accordance with applicable laws.

How do we use Personal Data?

We use your personal data to provide, maintain, improve, and promote our services, as well as to communicate with you. This includes using your data for the following purposes:

- **Service Delivery:** To operate the website and all its features, user interfaces, content, and related software.
- **Product Development and Improvement:** With your consent, to develop, test, and enhance our products and services, and to fix technical issues.

- **Marketing and Promotions:** If you agree, we and our marketing partners may send you information about new products, offers, and promotions.
- **Security and Protection:** To verify security, prevent fraud, detect threats, ensure user safety, and protect our services.
- **Communication:** To keep you informed about product updates, policy changes, and to respond to your inquiries.
- **Legal Compliance:** To comply with laws, respond to legal requests from authorities, protect against unlawful activities, and enforce our terms and policies.

Whom do we share Personal Data?

We store your personal data securely using cloud-based systems to protect it from unauthorised access.

We may share your data only when necessary, including with:

- **Our team members and contractors** who help us provide and maintain our services
- **Other companies within the Computools group** as part of our corporate operations.
- **Service Providers** who perform services on our behalf, such as marketing or technical support.
- **Partners**, if you have a relationship with them and sharing is needed to fulfill your requests.
- **Authorities**, when required by law or to protect the rights, safety, and security of Computools, our users, or the public.

We also collaborate with third parties for advertising campaigns and may share information with marketing partners to promote our services. Your data is only shared under strict conditions and with parties committed to protecting your privacy according to this Privacy Notice.

Your rights and controls.

- **Access, rectification, updating or deletion of your personal data.** You have the right to confirm whether we can process and access your personal data and to obtain a copy of your personal data that we process. You can also correct or update outdated or inaccurate personal data or request the deletion of personal data we hold about you.
- **Transferring and downloading a copy of your personal data.** You may submit a request to transfer or download a copy of your personal data.
- **Prohibition, restriction and withdrawal of consent.** You may prohibit the processing of your personal data or request that we restrict it. If we have collected and are processing personal data with your consent, you may withdraw your consent at any time. Withdrawal of consent will not affect the lawfulness of any processing we have carried out prior to such withdrawal; nor will it affect the processing of personal data carried out on the statutory grounds for processing personal data in the absence of consent.

- **Right to lodge a complaint.** You have the right to complain to an authorised data protection authority about our processing of your personal data, but we recommend that you contact us first if you have any questions or concerns.
- **The right to disobey decisions made by automated means.** You have the right to disobey a decision made solely by automated means if such a decision would have legal consequences for you or have an equally significant effect.
- **Push notifications.** You can enable mobile push notifications from Computools.
- **Emails and Text Messages.** If you no longer wish to receive certain communications from us via email or text message, you can opt out.
- **You can make cookie settings.** The choices regarding our use of cookies and similar technologies are described in the section “Setting Cookies”.

Children

We do not collect information about minors. We intentionally do not require or collect online or personal data and do not offer services to people under the age of 18. If we know that a person who is not yet 18 years old has provided us with their personal information without the consent of their parents, we will take measures to permanently delete such information.

Retention

We retain your personal data for as long as necessary to fulfill the purposes described in this Privacy Notice, unless a longer retention period is required by law.

The criteria we use to determine retention periods include:

- The duration of our ongoing relationship with you and the provision of Computools services (for example, as long as you use our products or services);
- Whether account holders or their users modify or delete information through their accounts;
- Whether we have a legal obligation to retain the data (for example, certain laws require us to keep transaction records for a specified period);
- Whether retention is advisable given our legal position (such as for enforcing agreements, resolving disputes, statutes of limitations, litigation, or regulatory investigations).

Security

We take reasonable administrative, logical, physical and managerial measures to protect your personal data from loss, theft, and unauthorised access, use and alteration. These measures are designed to provide a level of security that is appropriate to the risks of processing your personal data.

Your personal data is stored on cloud-based database management services used by Computools.

Sharing sensitive information through our service

You may use the information sharing feature available on our service to share personal information in the following ways:

- certain elements of our service give you the ability to share information in emails, text messages, social media and other data sharing applications using clients and applications on your device;
- information can be shared through social media plug-ins and similar technologies.

Social media plug-ins and applications are controlled by third-party social networks and are governed by their terms of use and privacy policies.

International Data Transfers

Computools operates globally, which means personal data may be transferred, stored (for example, in a data center), and processed outside of the country or region where it was initially collected.

Therefore, by using Computools products and services or providing personal data for any of the purposes stated above, you acknowledge that your personal data may be transferred to or stored in the United States where we are established, as well as in other countries outside of the EEA, Switzerland, and the UK. Such countries may have data protection rules that are different and less protective than those of your country.

We protect your personal data in accordance with this Privacy Notice wherever it is processed and take appropriate contractual or other steps to protect it under applicable laws. Where personal data of users in the EEA, Switzerland, or the UK is being transferred to a recipient located in a country outside the EEA, Switzerland, or the UK which has not been recognised as having an adequate level of data protection, we ensure that the transfer is governed by the European Commission's standard contractual clauses. Please contact us if you would like further information in that respect.

Also, we handle international personal information transfers in accordance with applicable laws, using safeguards like standard contractual clauses to protect your personal information.

- EU-US Data Privacy Framework

For personal information transfers from the EU to the US, we adhere to the EU-US Data Privacy Framework, ensuring compliance with various personal information protection principles.

- Data Security and Breach Notifications

We strive to use commercially acceptable means to protect your Personal Information. In the event of personal information breaches, we have an incident response plan to ensure timely notifications, as required by law.

- California & Other U.S. State Privacy Rights

But not limited - the "Shine The Light" law (California Civil Code Section 1798.83), California residents may request information about our personal information sharing practices for direct marketing purposes. We do not share personal information with third parties for their marketing purposes without your consent.

- COPPA Disclosure

In compliance with the Children's Online Privacy Protection Act (COPPA), we do not knowingly collect personal information from children under 13. If we become aware of such a collection, we will delete the personal information promptly

Changes to the Privacy Notice

We will update this Privacy Notice from time to time in response to changes in legal, regulatory and operational requirements. We will provide notice of such changes (and when they become effective) as required by law. Your use of the Computools Service after these changes become effective will be deemed to be your knowledge of and agreement to them (if applicable).

How to contact us ?

If you have questions about the Privacy Notice, how we use your personal data, or how to exercise your privacy rights, please contact our Chief Data Protection Officer or the Privacy Office at info@computools.com.

We will respond within 30 calendar days. We may ask for identity verification to ensure data security.

The legal entity that is responsible for your personal data (“Data Controller”):

COMPUTOOLS LLC

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EIN 81-4361575

info@computools.com.

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