

# Privacy Policy of Techalpha Group LLC

Techalpha Group LLC collects some Personal Data from its Users.

## Owner and Data Controller

TECHALPHA GROUP, LLC., a company organized and existing under the laws of the State of Michigan, USA

**Owner contact email:** info@techalphagroup.com

## Types of Data collected

Among the types of Personal Data that Techalpha Group LLC collects, by itself or through third parties, there are: Usage Data; email address; first name; last name; username; Trackers; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example).

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using Techalpha Group LLC.

Unless specified otherwise, all Data requested by Techalpha Group LLC is mandatory and failure to provide this Data may make it impossible for Techalpha Group LLC to provide its services. In cases where Techalpha Group LLC specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies - or of other tracking tools - by Techalpha Group LLC or by the owners of third-party services used by Techalpha Group LLC serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy.

Users are responsible for any third-party Personal Data obtained, published or shared through Techalpha Group LLC.

## Mode and place of processing the Data

### Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of Techalpha Group LLC (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

### Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

### Retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

## The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third

parties), detect any malicious or fraudulent activity, as well as the following: Access to third-party accounts, Analytics, Registration and authentication, Tag Management, Advertising and Content performance and features testing (A/B testing).

For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

## **Detailed information on the processing of Personal Data**

Personal Data is collected for the following purposes and using the following services:

### **Access to third-party accounts**

This type of service allows Techalpha Group LLC to access Data from your account on a third-party service and perform actions with it.

These services are not activated automatically, but require explicit authorization by the User.

#### **Google Drive account access (Google LLC)**

This service allows Techalpha Group LLC to connect with the User's account on Google Drive, provided by Google LLC.

Personal Data processed: email address; first name; last name; Usage Data; username.

Place of processing: United States - [Privacy Policy](#).

Category of personal information collected according to the CCPA: identifiers; internet or other electronic network activity information.

This processing constitutes:

- a sale according to the CCPA, CPA and CTDPA

### **Advertising**

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on Techalpha Group LLC, possibly based on User interests.

This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below.

Some of the services listed below may use Trackers to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User's interests and behavior, including those detected outside Techalpha Group LLC. For more information, please check the privacy policies of the relevant services.

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

#### **Reach (Reach International)**

Reach is an advertising service provided by Reach International.

Personal Data processed: Trackers; Usage Data.

Place of processing: United Arab Emirates - [Privacy Policy](#).

Category of personal information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA
- a sharing according to the CCPA
- targeted advertising according to the VCDPA, CPA, CTDPA and UCPA

### **Analytics**

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

## **Google Analytics (Google LLC)**

Google Analytics is a web analysis service provided by Google LLC ("Google"). Google utilizes the Data collected to track and examine the use of Techalpha Group LLC, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).

Category of personal information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA

## **Google Analytics Advertising Reporting Features (Google LLC)**

Google Analytics on Techalpha Group LLC has Advertising Reporting Features activated, which collects additional information from the DoubleClick cookie (web activity) and from device advertising IDs (app activity). It allows the Owner to analyze specific behavior and interests Data (traffic Data and Users' ads interaction Data) and, if enabled, demographic Data (information about the age and gender).

Users can opt out of Google's use of cookies by visiting Google's [Ads Settings](#).

Personal Data processed: Trackers; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).

Category of personal information collected according to the CCPA: identifiers; internet or other electronic network activity information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA

## **Google Analytics with anonymized IP (Google LLC)**

Google Analytics is a web analysis service provided by Google LLC ("Google"). Google utilizes the Data collected to track and examine the use of Techalpha Group LLC, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network. This integration of Google Analytics anonymizes your IP address. It works by shortening Users' IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).

Category of personal information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA

## **User ID extension for Google Analytics (Google LLC)**

Google Analytics on Techalpha Group LLC makes use of a feature called User ID. This setup allows for a more accurate tracking of Users by associating that User with the same ID over various sessions and devices. It is set up in a way that doesn't allow Google to personally identify an individual or permanently identify a particular device.

The User ID extension might make it possible to connect Data from Google Analytics with other Data about the User collected by Techalpha Group LLC.

The opt-out link below will only opt you out for the device you are on, but not from tracking performed

independently by the Owner. Contact the Owner via the email address provided in this privacy policy to object to the aforementioned tracking as well.

Personal Data processed: Trackers.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).

Category of personal information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA

## **Content performance and features testing (A/B testing)**

The services contained in this section allow the Owner to track and analyze the User response concerning web traffic or behavior regarding changes to the structure, text or any other component of Techalpha Group LLC.

### **Google Optimize 360 (Google LLC)**

Google Optimize 360 is an A/B testing service provided by Google LLC ("Google").

This service allows the Owner to target groups of Users on the base of their past use of Techalpha Group LLC. Users that [opt-out](#) of tracking by Google Analytics will not be included in experiments created in Google Optimize 360.

Google may use Personal Data to contextualize and personalize the ads of its own advertising network.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Category of personal information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA

### **Google Optimize (Google LLC)**

Google Optimize is an A/B testing service provided by Google LLC ("Google").

Google may use Personal Data to contextualize and personalize the ads of its own advertising network.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

Category of personal information collected according to the CCPA: internet or other electronic network activity information.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA

## **Registration and authentication**

By registering or authenticating, Users allow Techalpha Group LLC to identify them and give them access to dedicated services.

Depending on what is described below, third parties may provide registration and authentication services. In this case, Techalpha Group LLC will be able to access some Data, stored by these third-party services, for registration or identification purposes.

Some of the services listed below may also collect Personal Data for targeting and profiling purposes; to find out more, please refer to the description of each service.

### **Google OAuth (Google LLC)**

Google OAuth is a registration and authentication service provided by Google LLC and is connected to the Google network.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#).

Category of personal information collected according to the CCPA: identifiers.

This processing constitutes:

- a sale according to the CCPA, VCDPA, CPA, CTDPA and UCPA

## **Tag Management**

This type of service helps the Owner to manage the tags or scripts needed on Techalpha Group LLC in a centralized fashion.

This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

### **Google Tag Manager (Google LLC)**

Google Tag Manager is a tag management service provided by Google LLC.

Personal Data processed: Usage Data.

Place of processing: United States – [Privacy Policy](#).

Category of personal information collected according to the CCPA: internet or other electronic network activity information.

## **Information on opting out of interest-based advertising**

In addition to any opt-out feature provided by any of the services listed in this document, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section of the Cookie Policy.

## **Cookie Policy**

Techalpha Group LLC uses Trackers. To learn more, Users may consult the [Cookie Policy](#).

## **Additional information about Data collection and processing**

### **Legal action**

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of Techalpha Group LLC or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

### **Additional information about User's Personal Data**

In addition to the information contained in this privacy policy, Techalpha Group LLC may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

### **System logs and maintenance**

For operation and maintenance purposes, Techalpha Group LLC and any third-party services may collect files that record interaction with Techalpha Group LLC (System logs) or use other Personal Data (such as the IP Address) for this purpose.

### **Information not contained in this policy**

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

## Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within Techalpha Group LLC and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

## Futher information for California consumers

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the business running Techalpha Group LLC and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as "we", "us", "our").

This section applies to all Users (Users are referred to below, simply as "you", "your", "yours"), who are consumers residing in the state of California, United States of America, according to the "[California Consumer Privacy Act of 2018](#)" (the "CCPA"), as updated by the "California Privacy Rights Act" (the "CPRA") and subsequent regulations. For such consumers, this section supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the terms "personal information" (and "sensitive personal information") as defined in the California Consumer Privacy Act (CCPA).

## Notice at collection

### Categories of personal information collected, used, sold, or shared

In this section we summarize the categories of personal information that we've collected, used, sold, or shared and the purposes thereof. **You can read about these activities in detail in the section titled "Detailed information on the processing of Personal Data" within this document.**

#### Information we collect: the categories of personal information we collect

We have collected the following categories of personal information about you: identifiers and internet or other electronic network activity information.

We have collected the following categories of sensitive personal information: username

We will not collect additional categories of personal information without notifying you.

#### Your right to limit the use or disclosure of your sensitive personal information and how you can exercise it

You have the right to request that we limit the use or disclosure of your sensitive personal information to only that which is necessary to perform the services or provide the goods, as is reasonably expected by an average consumer.

We can also use your sensitive personal information to perform specific purposes set forth by the law (such as, including but not limited to, helping to ensure security and integrity; undertaking activities to verify or maintain the quality or safety of our service) and as authorized by the relevant regulations.

Outside of the aforementioned specific purposes, you have the right to freely request, at any time, that we do not use or disclose your sensitive personal information. This means that whenever you ask us to stop using your sensitive personal information, we will abide by your request and we will instruct our service providers and contractors to do the same.

To fully exercise your right to limit the use or disclosure of your sensitive personal information you can contact us at any time, using the contact details provided in this document.

For a simplified method you can also use the privacy choices link provided on Techalpha Group LLC.

We use any personal information collected from you in connection with the submission of your request solely for the purposes of complying with the request.

Once you have exercised this right, we are required to wait at least 12 months before asking whether you have changed your mind.

### **What are the purposes for which we use your personal information?**

We may use your personal information to allow the operational functioning of Techalpha Group LLC and features thereof (“business purposes”). In such cases, your personal information will be processed in a fashion necessary and proportionate to the business purpose for which it was collected, and strictly within the limits of compatible operational purposes.

We may also use your personal information for other reasons such as for commercial purposes (as indicated within the section “Detailed information on the processing of Personal Data” within this document), as well as for complying with the law and defending our rights before the competent authorities where our rights and interests are threatened or we suffer an actual damage.

We won’t process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.

### **How long do we keep your personal information?**

Unless stated otherwise inside the “Detailed information on the processing of Personal Data” section, we will not retain your personal information for longer than is reasonably necessary for the purpose(s) they have been collected for.

### **How we collect information: what are the sources of the personal information we collect?**

We collect the above-mentioned categories of personal information, either directly or indirectly, from you when you use Techalpha Group LLC.

For example, you directly provide your personal information when you submit requests via any forms on Techalpha Group LLC. You also provide personal information indirectly when you navigate Techalpha Group LLC, as personal information about you is automatically observed and collected.

Finally, we may collect your personal information from third parties that work with us in connection with the Service or with the functioning of this Application and features thereof.

### **How we use the information we collect: disclosing of your personal information with third parties for a business purpose**

For our purposes, the word “third party” means a person who is not any of the following: a service provider or a contractor, as defined by the CCPA.

We disclose your personal information with the third parties **listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document.** These third parties are grouped and categorized in accordance with the different purposes of processing.

### **Sale or sharing of your personal information**

For our purposes, the word “sale” means any “selling, renting, releasing, disclosing, disseminating, making available, transferring or otherwise communicating orally, in writing, or by electronic means, a consumer’s personal information by the business to **a third party, for monetary or other valuable consideration**”, as defined by the CCPA.

This means that, for example, a sale can happen whenever an application runs ads, or makes statistical analyses on the traffic or views, or simply because it uses tools such as social network plugins and the like.

For our purposes, the word “sharing” means any “sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s personal information by the business to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioral advertising for the benefit of a business in which no money is exchanged”, as defined by the CCPA.

Please note that the exchange of personal information with a service provider pursuant to a written contract that meets the requirements set by the CCPA, does not constitute a sale or sharing of your personal information.

### **Your right to opt out of the sale or sharing of your personal information and how you can exercise it**

We sell or share your personal information with the third parties **listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document.** These third parties are grouped and categorized in accordance with the different purposes of processing.

You have the right to opt out of the sale or sharing of your personal information. This means that whenever you request us to stop selling or sharing your personal information, we will abide by your request. Such requests can be made freely, at any time, without submitting any verifiable request. To fully exercise your right to opt out, you can contact us at any time using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on Techalpha Group LLC.

If you want to submit requests to opt out of the sale or sharing of personal information via a user-enabled global privacy control, like the Global Privacy Control ("[GPC](#)"), you are free to do so and we will abide by such request in a frictionless manner (as defined in the CPRA regulations). The GPC consists of a setting or extension in the browser or mobile device and acts as a mechanism that websites can use to indicate they support the GPC signal. If you want to use GPC, you can download and enable it via a [participating browser](#) or browser extension. More information about downloading GPC is available [here](#).

We use any personal information collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

Once you have opted out, we are required to wait at least 12 months before asking whether you have changed your mind.

#### **What are the purposes for which we use your personal information?**

We may use your personal information to allow the operational functioning of Techalpha Group LLC and features thereof ("business purposes"). In such cases, your personal information will be processed in a fashion necessary and proportionate to the business purpose for which it was collected, and strictly within the limits of compatible operational purposes.

We may also use your personal information for other reasons such as for commercial purposes (as indicated within the section "Detailed information on the processing of Personal Data" within this document), as well as for complying with the law and defending our rights before the competent authorities where our rights and interests are threatened or we suffer an actual damage.

We won't process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.

#### **How long do we keep your personal information?**

Unless stated otherwise inside the "Detailed information on the processing of Personal Data" section, we will not retain your personal information for longer than is reasonably necessary for the purpose(s) they have been collected for.

## **Your privacy rights under the California Consumer Privacy Act and how to exercise them**

### **The right to access personal information: the right to know and to portability**

You have the right to request that we disclose to you:

- the categories of personal information that we collect about you;
- the sources from which the personal information is collected;
- the purposes for which we use your information;
- to whom we disclose such information;
- the specific pieces of personal information we have collected about you.

You also have **the right to know what personal information is sold or shared and to whom**. In particular, you have the right to request two separate lists from us where we disclose:

- the categories of personal information that we sold or shared about you and the categories of third parties to whom the personal information was sold or shared;
- the categories of personal information that we disclosed about you for a business purpose and the categories of persons to whom it was disclosed for a business purpose.

The disclosure described above will be limited to the personal information collected or used over the past 12 months.

If we deliver our response electronically, the information enclosed will be "portable", i.e. delivered in an easily usable format to enable you to transmit the information to another entity without hindrance — provided that this is technically feasible.



## **The right to request the deletion of your personal information**

You have the right to request that we delete any of your personal information, subject to exceptions set forth by the law (such as, including but not limited to, where the information is used to identify and repair errors on Techalpha Group LLC, to detect security incidents and protect against fraudulent or illegal activities, to exercise certain rights etc.).

If no legal exception applies, as a result of exercising your right, we will delete your personal information and notify any of our service providers and all third parties to whom we have sold or shared the personal information to do so — provided that this is technically feasible and doesn't involve disproportionate effort.

## **The right to correct inaccurate personal information**

You have the right to request that we correct any inaccurate personal information we maintain about you, taking into account the nature of the personal information and the purposes of the processing of the personal information.

## **The right to opt out of sale or sharing of personal information and to limit the use of your sensitive personal information**

You have the right to opt out of the sale or sharing of your personal information. You also have the right to request that we limit our use or disclosure of your sensitive personal information.

## **The right of no retaliation following opt-out or exercise of other rights (the right to non-discrimination)**

We will not discriminate against you for exercising your rights under the CCPA. This means that we will not discriminate against you, including, but not limited to, by denying goods or services, charging you a different price, or providing a different level or quality of goods or services just because you exercised your consumer privacy rights.

However, if you refuse to provide your personal information to us or ask us to delete or stop selling your personal information, and that personal information or sale is necessary for us to provide you with goods or services, we may not be able to complete that transaction.

To the extent permitted by the law, we may offer you promotions, discounts, and other deals in exchange for collecting, keeping, or selling your personal information, provided that the financial incentive offered is reasonably related to the value of your personal information.

## **How to exercise your rights**

To exercise the rights described above, you need to submit your verifiable request to us by contacting us via the details provided in this document.

For us to respond to your request, it's necessary that we know who you are. Therefore, you can only exercise the above rights by making a verifiable request which must:

- provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative;
- describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We will not respond to any request if we are unable to verify your identity and therefore confirm the personal information in our possession actually relates to you.

Making a verifiable consumer request does not require you to create an account with us. We will use any personal information collected from you in connection with the verification of your request solely for the purposes of verification and shall not further disclose the personal information, retain it longer than necessary for purposes of verification, or use it for unrelated purposes.

If you cannot personally submit a verifiable request, you can authorize a person registered with the California Secretary of State to act on your behalf.

If you are an adult, you can make a verifiable request on behalf of a child under your parental authority.

You can submit a maximum number of 2 requests over a period of 12 months.

## **How and when we are expected to handle your request**

We will confirm receipt of your verifiable request within 10 days and provide information about how we will process your request.

We will respond to your request within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Our disclosure(s) will cover the preceding 12-month period. Only with regard to personal information collected on or after January 1, 2022, you have the right to request that we disclose information beyond the 12-month period, and we will provide them to you unless doing so proves impossible or would involve a disproportionate effort.

Should we deny your request, we will explain you the reasons behind our denial.

We do not charge a fee to process or respond to your verifiable request unless such request is manifestly unfounded or excessive. In such cases, we may charge a reasonable fee, or refuse to act on the request. In either case, we will communicate our choices and explain the reasons behind it.

## **Further information for Virginia consumers**

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the controller running this Application and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”).

This section applies to all Users (Users are referred to below, simply as “you”, “your”, “yours”), who are consumers residing in the Commonwealth of Virginia, according to the [“Virginia Consumer Data Protection Act”](#) (the “VCDPA”), and, for such consumers, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the term “personal data” as defined in the VCDPA.

### **Categories of personal data processed**

In this section, we summarize the categories of personal data that we've processed and the purposes thereof. **You can read about these activities in detail in the section titled “Detailed information on the processing of Personal Data” within this document.**

#### **Categories of personal data we collect**

We have collected the following categories of personal data: identifiers and internet information

We do not collect sensitive data.

We will not collect additional categories of personal data without notifying you.

#### **Why we process your personal data**

To find out why we process your personal data, you can read the sections titled “Detailed information on the processing of Personal Data” and “The purposes of processing” within this document.

We won't process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.

You can freely give, deny, or withdraw such consent at any time using the contact details provided in this document.

#### **How we use the data we collect: sharing of your personal data with third parties**

We share your personal data with the third parties **listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document.** These third parties are grouped and categorized in accordance with the different purposes of processing.

For our purposes, the word "third party" means "a natural or legal person, public authority, agency, or body other than the consumer, controller, processor, or an affiliate of the processor or the controller" as defined by the VCDPA.

#### **Sale of your personal data**

For our purposes, the word “sale” means any “exchange of personal data for monetary consideration by us to a third party” as defined by the VCDPA.

Please note that according to the VCDPA, the disclosure of personal data to a processor that processes personal data on behalf of a controller does not constitute a sale. In addition, other specific exceptions set forth in the VCDPA may apply, such as, but not limited to, the disclosure of personal data to a third party for the provision of a product or service requested by you.

As specified in the “Detailed information on the processing of Personal Data” section of this document, our use of your personal information may be considered a sale under VCDPA.

#### **Your right to opt out of the sale of your personal data and how you can exercise it**

You have the right to opt out of the sale of your personal data. This means that whenever you request us to stop selling your data, we will abide by your request. To fully exercise your right to opt out you can contact us at any time using the contact details provided in this document.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purpose of complying with the request.

#### **Processing of your personal data for targeted advertising**

For our purposes, the word "targeted advertising" means "displaying advertisements to you where the advertisement is selected based on personal data obtained from your activities over time and across nonaffiliated websites or online applications to predict your preferences or interests" as defined by the VCDPA.

Please note that according to the VCDPA, targeted advertising does not include: “advertisements based on activities within a controller's own websites or online applications; advertisements based on the context of a consumer's current search query, visit to a website or online application; advertisements directed to a consumer in response to the consumer's request for information or feedback; or processing personal data solely for measuring or reporting advertising performance, reach, or frequency”.

To find out more details on the processing of your personal data for targeted advertising purposes, you can read the section titled “Detailed information on the processing of Personal Data” within this document.

#### **Your right to opt out of the processing of your personal data for targeted advertising and how you can exercise it**

You have the right to opt out of the processing of your personal data for targeted advertising. This means that whenever you ask us to stop processing your data for targeted advertising, we will abide by your request. To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

#### **Your privacy rights under the Virginia Consumer Data Protection Act and how to exercise them**

You may exercise certain rights regarding your data processed by us. In particular, you have the right to do the following:

- **access personal data: the right to know.** You have the right to request that we confirm whether or not we are processing your personal data. You also have the right to access such personal data.
- **correct inaccurate personal data.** You have the right to request that we correct any inaccurate personal data we maintain about you, taking into account the nature of the personal data and the purposes of the processing of the personal data.
- **request the deletion of your personal data.** You have the right to request that we delete any of your personal data.
- **obtain a copy of your personal data.** We will provide your personal data in a portable and usable format that allows you to transfer data easily to another entity — provided that this is technically feasible.
- **opt out of the processing of your personal data for the purposes of targeted advertising**, the **sale of personal data**, or **profiling** in furtherance of decisions that produce legal or similarly significant effects concerning you.
- **non-discrimination.** We will not discriminate against you for exercising your rights under the VCDPA. This means that we will not, among other things, deny goods or services, charge you a different price, or provide a different level or quality of goods or services just because you exercised your consumer privacy rights. However, if you refuse to provide your personal data to us or ask us to delete or stop selling your personal data, and that personal data or sale is necessary for us to provide you with goods or services, we may not be able to complete that transaction. To the extent permitted by the law, we may offer a different price, rate, level, quality, or selection of goods or services to you, including

offering goods or services for no fee, if you have exercised your right to opt out, or our offer is related to your voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program.

## **How to exercise your rights**

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document.

For us to respond to your request, we need to know who you are.

We will not respond to any request if we are unable to verify your identity using commercially reasonable efforts and therefore confirm that the personal data in our possession actually relate to you. In such cases, we may request that you provide additional information which is reasonably necessary to authenticate you and your request.

Making a consumer request does not require you to create an account with us. However, we may require you to use your existing account. We will use any personal data collected from you in connection with your request solely for the purposes of authentication, without further disclosing the personal data, retaining it longer than necessary for purposes of authentication, or using it for unrelated purposes.

If you are an adult, you can make a request on behalf of a child under your parental authority.

## **How and when we are expected to handle your request**

We will respond to your request without undue delay, but in all cases and at the latest within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Should we deny your request, we will explain to you the reasons behind our denial without undue delay, but in all cases and at the latest within 45 days of receipt of the request. It is your right to appeal such decision by submitting a request to us via the details provided in this document. Within 60 days of receipt of the appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied you may [contact the Attorney General to submit a complaint](#).

We do not charge a fee to respond to your request, for up to two requests per year. If your request is manifestly unfounded, excessive or repetitive, we may charge a reasonable fee or refuse to act on the request. In either case, we will communicate our choices and explain the reasons behind them.

## **Further information for Colorado consumers**

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the controller running Techalpha Group LLC and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”).

This section applies to all Users (Users are referred to below, simply as “you”, “your”, “yours”), who are consumers residing in the State of Colorado, according to the “Colorado Privacy Act” (the “CPA”), and, for such consumers, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the term “personal data” as defined in the CPA.

## **Categories of personal data processed**

In this section, we summarize the categories of personal data that we've processed and the purposes thereof. **You can read about these activities in detail in the section titled “Detailed information on the processing of Persona Data” within this document.**

### **Categories of personal data we collect**

We have collected the following categories of personal data: identifiers and internet information

We do not collect sensitive data.

We will not collect additional categories of personal data without notifying you.

### **Why we process your personal data**

To find out why we process your personal data, you can read the sections titled “Detailed information on the processing of Personal Data” and “The purposes of processing” within this document.

We won't process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.

You can freely give, deny, or withdraw such consent at any time using the contact details provided in this document.

### **How we use the data we collect: sharing of your personal data with third parties**

We share your personal data with the third parties **listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document.** These third parties are grouped and categorized in accordance with the different purposes of processing.

For our purposes, the word "third party" means "a person, public authority, agency, or body other than a consumer, controller, processor, or affiliate of the processor or the controller." as defined by the CPA.

### **Sale of your personal data**

As specified in the “Detailed information on the processing of Personal Data” section of this document, our use of your personal data may be considered a sale under the CPA.

For our purposes, the word "sale", "sell", or "sold" means "the exchange of personal data for monetary or other valuable consideration by a controller to a third party" as defined by the CPA.

Please note that according to the CPA, the disclosure of personal data to a processor that processes personal data on behalf of a controller does not constitute a sale. In addition, other specific exceptions set forth in the CPA may apply, such as, but not limited to, the disclosure of personal data to a third party for the provision of a product or service requested by you.

### **Your right to opt out of the sale of your personal data and how you can exercise it**

You have the right to opt out of the sale of your personal data. This means that whenever you request us to stop selling your data, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on Techalpha Group LLC.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purpose of complying with the request.

### **Processing of your personal data for targeted advertising**

As specified in the “Detailed information on the processing of Personal Data” section of this document, we may use your personal data for targeted advertising purposes.

For our purposes, the word "targeted advertising" means "displaying to a consumer an advertisement that is selected based on personal data obtained or inferred over time from the consumer's activities across nonaffiliated websites, applications, or online services to predict consumer preferences or interests" as defined by CPA.

Please note that according to the CPA, targeted advertising does not include: “advertisements directed to a consumer in response to the consumer's request for information or feedback; advertisements based on activities within a controller's own websites or online applications or any affiliated website or online application; advertisements based on the context of a consumer's current search query, visit to an internet web site or online application; or processing personal data solely to measure or report advertising frequency, performance or reach”.

### **Your right to opt out of the processing of your personal data for targeted advertising and how you can exercise it**

You have the right to opt out of the processing of your personal data for targeted advertising. This means that whenever you ask us to stop processing your data for targeted advertising, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on Techalpha Group LLC.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

#### **Universal opt-out mechanism: Global privacy control**

If you want to submit requests to opt-out of the sale of personal data or the targeted advertising via a user-enabled global privacy control, like the Global Privacy Control ("[GPC](#)"), you are free to do so and we will abide by such request. The GPC consists of a setting or extension in the browser or mobile device and acts as a mechanism that websites can use to indicate they support the GPC signal. If you want to use GPC, you can download and enable it via a participating browser or browser extension. More information about downloading GPC is available [here](#).

### **Your privacy rights under the Colorado Privacy Act and how to exercise them**

You may exercise certain rights regarding your data processed by us. In particular, you have the right to do the following:

- opt out of the processing of your personal data for the purposes of targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.
- access personal data. You have the right to request that we confirm whether or not we are processing your personal data. You also have the right to access such personal data.
- correct inaccurate personal data. You have the right to request that we correct any inaccurate personal data we maintain about you, taking into account the nature of the personal data and the purposes of the processing of the personal data.
- request the deletion of your personal data. You have the right to request that we delete any of your personal data.
- obtain a copy of your personal data. We will provide your personal data in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible.

In any case, we will not increase the cost of, or decrease the availability of, a product or service, based solely on the exercise of any of your rights and unrelated to the feasibility or the value of a service. However, to the extent permitted by the law, we may offer a different price, rate, level, quality, or selection of goods or services to you, including offering goods or services for no fee, if our offer is related to your voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program.

#### **How to exercise your rights**

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document.

For us to respond to your request, we need to know who you are and which right you wish to exercise.

We will not respond to any request if we are unable to verify your identity using commercially reasonable efforts and therefore confirm that the personal data in our possession actually relate to you. In such cases, we may request that you provide additional information which is reasonably necessary to authenticate you and your request.

Making a consumer request does not require you to create an account with us. However, we may require you to use your existing account. We will use any personal data collected from you in connection with your request solely for the purposes of authentication, without further disclosing the personal data, retaining it longer than necessary for purposes of authentication, or using it for unrelated purposes.

If you are an adult, you can make a request on behalf of a child under your parental authority.

#### **How and when we are expected to handle your request**

We will respond to your request without undue delay, but in all cases and at the latest within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Should we deny your request, we will explain to you the reasons behind our denial without undue delay, but in all cases and at the latest within 45 days of receipt of the request. It is your right to appeal such decision by submitting a request to us via the details provided in this document. Within 45 days of receipt of the appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied you may contact the Attorney General to submit a complaint.

We do not charge a fee to respond to your request, for up to two requests per year.

## **Further information for Connecticut consumers**

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the controller running Techalpha Group LLC and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”).

This section applies to all Users (Users are referred to below, simply as “you”, “your”, “yours”), who are consumers residing in the State of Connecticut, according to “An Act Concerning Personal Data Privacy and Online Monitoring ” (also known as “The Connecticut Data Privacy Act” or the “CTDPA”), and, for such consumers, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the term “personal data” as defined in the CTDPA.

### **Categories of personal data processed**

In this section, we summarize the categories of personal data that we've processed and the purposes thereof. **You can read about these activities in detail in the section titled “Detailed information on the processing of Personal Data” within this document.**

#### **Categories of personal data we collect**

We have collected the following categories of personal data: identifiers and internet information

We do not collect sensitive data.

We will not collect additional categories of personal data without notifying you.

#### **Why we process your personal data**

To find out why we process your personal data, you can read the sections titled “Detailed information on the processing of Personal Data” and “The purposes of processing” within this document.

We won't process your information for unexpected purposes, or for purposes incompatible with the purposes originally disclosed, without your consent.

You can freely give, deny, or withdraw such consent at any time using the contact details provided in this document.

#### **How we use the data we collect: sharing of your personal data with third parties**

We share your personal data with the third parties **listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document.** These third parties are grouped and categorized in accordance with the different purposes of processing.

For our purposes, the word "third party" means "a person, public authority, agency, or body other than a consumer, controller, processor, or affiliate of the processor or the controller." as defined by the CTDPA.

#### **Sale of your personal data**

As specified in the “Detailed information on the processing of Personal Data” section of this document, our use of your personal data may be considered a sale under the CTDPA.

For our purposes, the word "sale", "sell", or "sold" means "the exchange of personal data for monetary or other valuable consideration by a controller to a third party" as defined by the CTDPA.

Please note that according to the CTDPA, the disclosure of personal data to a processor that processes personal data on behalf of a controller does not constitute a sale. In addition, other specific exceptions set forth in the CTDPA may apply, such as, but not limited to, the disclosure of personal data to a third party for the provision of a product or service requested by you.

#### **Your right to opt out of the sale of your personal data and how you can exercise it**

You have the right to opt out of the sale of your personal data. This means that whenever you request us to stop selling your data, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on Techalpha Group LLC.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purpose of complying with the request.

### **Processing of your personal data for targeted advertising**

As specified in the "Detailed information on the processing of Personal Data" section of this document, we may use your personal data for targeted advertising purposes.

For our purposes, the word "targeted advertising" means "displaying to a consumer an advertisement that is selected based on personal data obtained or inferred over time from the consumer's activities across non affiliated websites, applications, or online services to predict consumer preferences or interests" as defined by CTDPA.

Please note that according to the CTDPA, targeted advertising does not include: "advertisements based on activities within a controller's own web sites or online applications; advertisements based on the context of a consumer's current search query, visit to an internet web site or online application; advertisements directed to a consumer in response to the consumer's request for information or feedback; or processing personal data solely to measure or report advertising frequency, performance or reach".

### **Your right to opt out of the processing of your personal data for targeted advertising and how you can exercise it**

You have the right to opt out of the processing of your personal data for targeted advertising. This means that whenever you ask us to stop processing your data for targeted advertising, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on Techalpha Group LLC.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

### **Universal opt-out mechanism: Global privacy control**

If you want to submit requests to opt-out of the sale of personal data or the targeted advertising via a user-enabled global privacy control, like the Global Privacy Control ("[GPC](#)"), you are free to do so and we will abide by such request. The GPC consists of a setting or extension in the browser or mobile device and acts as a mechanism that websites can use to indicate they support the GPC signal. If you want to use GPC, you can download and enable it via a participating browser or browser extension. More information about downloading GPC is available [here](#).

### **Your privacy rights under the Connecticut Data Privacy Act and how to exercise them**

You may exercise certain rights regarding your data processed by us. In particular, you have the right to do the following:

- access personal data. You have the right to request that we confirm whether or not we are processing your personal data. You also have the right to access such personal data.
- correct inaccurate personal data. You have the right to request that we correct any inaccurate personal data we maintain about you, taking into account the nature of the personal data and the purposes of the processing of the personal data.
- request the deletion of your personal data. You have the right to request that we delete any of your personal data.
- obtain a copy of your personal data. We will provide your personal data in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible.
- opt out of the processing of your personal data for the purposes of targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.

In any case, we will not increase the cost of, or decrease the availability of, a product or service, based solely on the exercise of any of your rights and unrelated to the feasibility or the value of a service. However, to the extent permitted by the law, we may offer a different price, rate, level, quality, or selection of goods or



services to you, including offering goods or services for no fee, if our offer is related to your voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program.

## **How to exercise your rights**

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document.

For us to respond to your request, we need to know who you are and which right you wish to exercise.

We will not respond to any request if we are unable to verify your identity using commercially reasonable efforts and therefore confirm that the personal data in our possession actually relate to you. In such cases, we may request that you provide additional information which is reasonably necessary to authenticate you and your request.

Making a consumer request does not require you to create an account with us. However, we may require you to use your existing account. We will use any personal data collected from you in connection with your request solely for the purposes of authentication, without further disclosing the personal data, retaining it longer than necessary for purposes of authentication, or using it for unrelated purposes.

If you are an adult, you can make a request on behalf of a child under your parental authority.

## **How and when we are expected to handle your request**

We will respond to your request without undue delay, but in all cases and at the latest within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Should we deny your request, we will explain to you the reasons behind our denial without undue delay, but in all cases and at the latest within 45 days of receipt of the request. It is your right to appeal such decision by submitting a request to us via the details provided in this document. Within 45 days of receipt of the appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied, you may [contact the Attorney General to submit a complaint](#).

We do not charge a fee to respond to your request, for up to one request per year.

## **Further information for Utah consumers**

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the controller running Techalpha Group LLC and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”).

This section applies to all Users (Users are referred to below, simply as “you”, “your”, “yours”), who are consumers residing in the State of Utah, according to the “Consumer Privacy Act” (the “UCPA”), and, for such consumers, it supersedes any other possibly divergent or conflicting information contained in the privacy policy.

This part of the document uses the term “personal data” as defined in the UCPA.

## **Categories of personal data processed**

In this section, we summarize the categories of personal data that we've processed and the purposes thereof. **You can read about these activities in detail in the section titled “Detailed information on the processing of Persona Data” within this document.**

### **Categories of personal data we collect**

We have collected the following categories of personal data: identifiers and internet information

We do not collect sensitive data.

We will not collect additional categories of personal data without notifying you.

### **Why we process your personal data**

To find out why we process your personal data, you can read the sections titled “Detailed information on the

processing of Personal Data” and “The purposes of processing” within this document.

### **How we use the data we collect: sharing of your personal data with third parties**

We share your personal data with the third parties **listed in detail in the section titled “Detailed information on the processing of Personal Data” within this document**. These third parties are grouped and categorized in accordance with the different purposes of processing.

For our purposes, the word "third party" means "a person other than: the consumer, controller, or processor; or an affiliate or contractor of the controller or the processor" as defined by the UCPA.

### **Sale of your personal data**

As specified in the “Detailed information on the processing of Personal Data” section of this document, our use of your personal data may be considered a sale under the UCPA.

For our purposes, the word "sale", "sell", or "sold" means "the exchange of personal data for monetary or other valuable consideration by a controller to a third party" as defined by the UCPA.

Please note that according to the UCPA, the disclosure of personal data to a processor that processes personal data on behalf of a controller does not constitute a sale. In addition, other specific exceptions set forth in the UCPA may apply, such as, but not limited to, the disclosure of personal data to a third party for the provision of a product or service requested by you.

### **Your right to opt out of the sale of your personal data and how you can exercise it**

You have the right to opt out of the sale of your personal data. This means that whenever you request us to stop selling your data, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on Techalpha Group LLC.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purpose of complying with the request.

### **Processing of your personal data for targeted advertising**

As specified in the “Detailed information on the processing of Personal Data” section of this document, we may use your personal data for targeted advertising purposes.

For our purposes, the word "targeted advertising" means "displaying to a consumer an advertisement that is selected based on personal data obtained or inferred over time from the consumer's activities across nonaffiliated websites, applications, or online services to predict consumer preferences or interests" as defined by UCPA.

Please note that according to the UCPA, targeted advertising does not include: “advertisements based on activities within a controller's own websites or online applications or any affiliated website or online application; advertisements based on the context of a consumer's current search query, visit to a web site or online application; advertisements directed to a consumer in response to the consumer's request for information, product, a service or feedback; or processing personal data solely to measure or report advertising performance, reach or frequency.”

### **Your right to opt out of the processing of your personal data for targeted advertising and how you can exercise it**

You have the right to opt out of the processing of your personal data for targeted advertising. This means that whenever you ask us to stop processing your data for targeted advertising, we will abide by your request.

To fully exercise your right to opt out you can contact us at any time, using the contact details provided in this document.

For a simplified opt-out method you can also use the privacy choices link provided on Techalpha Group LLC.

We use any personal data collected from you in connection with the submission of your opt-out request solely for the purposes of complying with the opt-out request.

### **Your privacy rights under the Utah Consumer Privacy Act and how to exercise**

## **them**

You may exercise certain rights regarding your data processed by us. In particular, you have the right to do the following:

- access personal data. You have the right to request that we confirm whether or not we are processing your personal data. You also have the right to access such personal data.
- request the deletion of your personal data. You have the right to request that we delete any of your personal data.
- obtain a copy of your personal data. We will provide your personal data in a portable and usable format that allows you to transfer data easily to another entity – provided that this is technically feasible.
- opt out of the processing of your personal data for the purposes of targeted advertising or the sale of personal data.

In any case, we will not increase the cost of, or decrease the availability of, a product or service, based solely on the exercise of any of your rights and unrelated to the feasibility or the value of a service. However, to the extent permitted by the law, we may offer a different price, rate, level, quality, or selection of goods or services to you, including offering goods or services for no fee, if our offer is related to your voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program.

### **How to exercise your rights**

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document.

For us to respond to your request, we need to know who you are and which right you wish to exercise.

We will not respond to any request if we are unable to verify your identity using commercially reasonable efforts and therefore confirm that the personal data in our possession actually relate to you. In such cases, we may request that you provide additional information which is reasonably necessary to authenticate you and your request. We may retain your email address to respond to your request.

If you are an adult, you can make a request on behalf of a child under your parental authority.

### **How and when we are expected to handle your request**

We will respond to your request without undue delay, but in all cases and at the latest within 45 days of its receipt. Should we need more time, we will explain to you the reasons why, and how much more time we need. In this regard, please note that we may take up to 90 days to fulfill your request.

Should we deny your request, we will explain to you the reasons behind our denial without undue delay, but in all cases and at the latest within 45 days of receipt of the request.

We do not charge a fee to respond to your request, for up to one request per year.

## **Further information for Users in Brazil**

This section of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the entity running Techalpha Group LLC and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as “we”, “us”, “our”). This section applies to all Users in Brazil (Users are referred to below, simply as “you”, “your”, “yours”), according to the “Lei Geral de Proteção de Dados” (the “LGPD”), and for such Users, it supersedes any other possibly divergent or conflicting information contained in the privacy policy. This part of the document uses the term “personal information” as it is defined in the **LGPD**.

### **The grounds on which we process your personal information**

We can process your personal information solely if we have a legal basis for such processing. Legal bases are as follows:

- your consent to the relevant processing activities;
- compliance with a legal or regulatory obligation that lies with us;
- the carrying out of public policies provided in laws or regulations or based on contracts, agreements and similar legal instruments;
- studies conducted by research entities, preferably carried out on anonymized personal information;
- the carrying out of a contract and its preliminary procedures, in cases where you are a party to said contract;
- the exercising of our rights in judicial, administrative or arbitration procedures;

- protection or physical safety of yourself or a third party;
- the protection of health – in procedures carried out by health entities or professionals;
- our legitimate interests, provided that your fundamental rights and liberties do not prevail over such interests; and
- credit protection.

To find out more about the legal bases, you can contact us at any time using the contact details provided in this document.

## **Categories of personal information processed**

To find out what categories of your personal information are processed, you can read the section titled “Detailed information on the processing of Personal Data” within this document.

## **Why we process your personal information**

To find out why we process your personal information, you can read the sections titled “Detailed information on the processing of Personal Data” and “The purposes of processing” within this document.

## **Your Brazilian privacy rights, how to file a request and our response to your requests**

### **Your Brazilian privacy rights**

You have the right to:

- obtain confirmation of the existence of processing activities on your personal information;
- access to your personal information;
- have incomplete, inaccurate or outdated personal information rectified;
- obtain the anonymization, blocking or elimination of your unnecessary or excessive personal information, or of information that is not being processed in compliance with the LGPD;
- obtain information on the possibility to provide or deny your consent and the consequences thereof;
- obtain information about the third parties with whom we share your personal information;
- obtain, upon your express request, the portability of your personal information (except for anonymized information) to another service or product provider, provided that our commercial and industrial secrets are safeguarded;
- obtain the deletion of your personal information being processed if the processing was based upon your consent, unless one or more exceptions provided for in art. 16 of the LGPD apply;
- revoke your consent at any time;
- lodge a complaint related to your personal information with the ANPD (the National Data Protection Authority) or with consumer protection bodies;
- oppose a processing activity in cases where the processing is not carried out in compliance with the provisions of the law;
- request clear and adequate information regarding the criteria and procedures used for an automated decision; and
- request the review of decisions made solely on the basis of the automated processing of your personal information, which affect your interests. These include decisions to define your personal, professional, consumer and credit profile, or aspects of your personality.

You will never be discriminated against, or otherwise suffer any sort of detriment, if you exercise your rights.

### **How to file your request**

You can file your express request to exercise your rights free from any charge, at any time, by using the contact details provided in this document, or via your legal representative.

### **How and when we will respond to your request**

We will strive to promptly respond to your requests.

In any case, should it be impossible for us to do so, we’ll make sure to communicate to you the factual or legal reasons that prevent us from immediately, or otherwise ever, complying with your requests. In cases where we are not processing your personal information, we will indicate to you the physical or legal person to whom you should address your requests, if we are in the position to do so.

In the event that you file an **access** or personal information **processing confirmation** request, please make sure that you specify whether you’d like your personal information to be delivered in electronic or printed form.

You will also need to let us know whether you want us to answer your request immediately, in which case we

will answer in a simplified fashion, or if you need a complete disclosure instead.

In the latter case, we'll respond within 15 days from the time of your request, providing you with all the information on the origin of your personal information, confirmation on whether or not records exist, any criteria used for the processing and the purposes of the processing, while safeguarding our commercial and industrial secrets.

In the event that you file a **rectification, deletion, anonymization or personal information blocking** request, we will make sure to immediately communicate your request to other parties with whom we have shared your personal information in order to enable such third parties to also comply with your request — except in cases where such communication is proven impossible or involves disproportionate effort on our side.

## **Transfer of personal information outside of Brazil permitted by the law**

We are allowed to transfer your personal information outside of the Brazilian territory in the following cases:

- when the transfer is necessary for international legal cooperation between public intelligence, investigation and prosecution bodies, according to the legal means provided by the international law;
- when the transfer is necessary to protect your life or physical security or those of a third party;
- when the transfer is authorized by the ANPD;
- when the transfer results from a commitment undertaken in an international cooperation agreement;
- when the transfer is necessary for the execution of a public policy or legal attribution of public service;
- when the transfer is necessary for compliance with a legal or regulatory obligation, the carrying out of a contract or preliminary procedures related to a contract, or the regular exercise of rights in judicial, administrative or arbitration procedures.

## **Definitions and legal references**

### **Personal Data (or Data)**

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

### **Usage Data**

Information collected automatically through Techalpha Group LLC (or third-party services employed in Techalpha Group LLC), which can include: the IP addresses or domain names of the computers utilized by the Users who use Techalpha Group LLC, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

### **User**

The individual using Techalpha Group LLC who, unless otherwise specified, coincides with the Data Subject.

### **Data Subject**

The natural person to whom the Personal Data refers.

### **Data Processor (or Processor)**

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

### **Data Controller (or Owner)**

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, including the security measures concerning the operation and use of Techalpha Group LLC. The Data Controller, unless otherwise specified, is the Owner of Techalpha Group LLC.

### **Techalpha Group LLC (or this Application)**

The means by which the Personal Data of the User is collected and processed.

### **Service**

The service provided by Techalpha Group LLC as described in the relative terms (if available) and on this site/application.

### **European Union (or EU)**

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

### **Cookie**

Cookies are Trackers consisting of small sets of data stored in the User's browser.

### **Tracker**

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

### **Legal information**

This privacy statement has been prepared based on provisions of multiple legislations.

This privacy policy relates solely to Techalpha Group LLC, if not stated otherwise within this document.

Latest update: June 15, 2023