

PRIVACY POLICY

Last updated: August 11, 2021

This Privacy Policy applies between you, the User of this Website and Toolzo Limited, the owner and provider of this Website. This Privacy Policy applies to our use of any and all Data collected by us or provided by you in relation to your use of the Website

PLEASE READ THIS PRIVACY POLICY CAREFULLY.

INTERPRETATION

In this Privacy Policy, unless the context requires a different interpretation:

- the singular includes the plural and vice versa;
- a reference to a person includes firms, companies, government entities, trusts and partnerships;
- reference to any statutory provision includes any modification or amendment of it;
- the headings and sub-headings do not form part of this Privacy Policy.

DEFINITIONS

In this Privacy Policy, the following definitions are used:

- **Data** – collectively all information that you submit to Toolzo Limited via the Website. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws;
- **Cookies** – a small piece of data that a Website stores on your device when you visit the Website, typically containing information about the website itself, a unique identifier that allows the website to recognize your web browser when you return, additional data that serves the purpose of the cookie, and the lifespan of the cookie itself. Please read our Cookie Policy for more information about Cookies.
- **Data Protection Laws** – any applicable law relating to the processing of Personal Data, including but not limited to the Directive 96/46/EC (Data Protection Directive) or the GDPR, and any national implementing laws, regulations and secondary legislation;
- **GDPR** – the General Data Protection Regulation (EU) 2016/679;
- **Toolzo Limited, We, Us, Our and Ourselves** – refers to Toolzo Limited, a company incorporated in the Republic of Ireland with registered number 673171 whose registered office is located at 3 Cavendish Row, Dublin 1, D 01 A2T5;
- **UK and EU Cookie Law** – the Privacy and Electronic Communication (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communication (EC Directive) (Amendment) Regulations 2011;
- **User or You** – any third party that accesses the Website and is not either (i) employed by Toolzo Limited and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to Toolzo Limited and accessing the Website in connection with the provision of such services; and
- **Website or Site** – the Website that you were browsing when you clicked on a link to this Privacy Policy, including all subsidiary pages, <https://toolzo.com>, and any sub-domains of this site unless expressly excluded by their own terms and conditions.

PERSONAL DATA

According to the General Data Protection Regulation, personal data are defined as: "Any information relating to an identified individual or identifiable individual ("data subject"); an identifiable individual is an identifiable person, directly or indirectly, in particular by an identifier such as name, identification number, location data, online identifier or by one or more features specific to that individual's physical,

physiological, genetic, mental, economic, cultural or social identity;". Therefore, personal data is not only your name and personal identification number, but also your home address, email, telephone number and more.

PERSONAL DATA WE COLLECT

We may collect the following Data, which includes personal Data, from you:

- name;
- date of birth;
- gender;
- job title;
- profession;
- email addresses and telephone numbers;
- financial information such as credit/debit card numbers;
- IP address;
- computer device information;
- web browser type and version;
- operating system;
- a list of URLs starting with a referring site, your activity on this Website, and the site you exit to.

BASIC PRINCIPLES

We are aware of the responsibility we carry for the security of your personal data. We always aim to process and manage your personal information in a transparent manner, that is why we observe the following principles:

- We process your personal data for the purposes pointed out in this Privacy Policy; or for specific purposes that we have expressly shared with you; or for the purposes for which you have given your consent;
- We strive to collect the minimum data we need;
- To keep your personal data accurate and updated;
- When we no longer need your personal data, we delete or anonymize it so that it does not allow your identity to be identified.

HOW WE COLLECT YOUR DATA

We collect Data in the following ways:

- data provided by you:
 - when you contact us through the Website, by telephone, post, e-mail or through any other means;
 - when you register with us and set up an account;
 - when you make payments to us, through this Website or otherwise;
 - when you elect to receive marketing communication from us;
 - when you use our services.
- data collected automatically:
 - we automatically collect some information about your visit to the Website. This information helps us to make improvements to Website content and navigation. and includes your IP address, the date, times and frequency with which you access the Website and the way you use and interact with its content.
 - we will collect your Data automatically via cookies, in line with the cookie settings on your browser. For some information about cookies, and how we use them on the Website, see the section below, headed "Cookies".

HOW WE USE YOUR PERSONAL DATA

Any or all of the above Data may be required by us from time to time in order to provide you with the service when using our Website. Specifically, Data may be used by us for the following reasons:

- internal record keeping;
- transmission by email of marketing materials;
- payment transactions execution;

- payment data processing.

We intend to use such data for purposes of supporting your relationship with us by designing content that is suitable to your needs and alerting you to new product and service offerings as they become available. This personal data may be retained by us to verify compliance with the agreement between us, to keep track of the domains from which people visit us, to create a user profile to better serve you, or to simply contact you either electronically or otherwise. If you decide that we should not use your personal data to contact you, please let us know and we will not use that information for such purpose.

We may also use personal data for various purposes, including without limitation:

- to help diagnose problems with our Website, to administer our Website, and to enhance our Website for optimal user experience;
- to monitor the usage and performance of our Website, and to determine aggregate information about our users and usage pattern;
- to identify you when you access and use our services; to provide maintenance, support, and customer service for our Website;
- to conduct research and analysis; and
- to fulfil other legitimate purposes permitted by applicable law.

RIGHTS YOU HAVE

You have the following rights in relation to your Data:

- Right to access – the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information.
- Right to correct – the right to have your Data rectified if it is inaccurate or incomplete.
- Right to erase – the right to request that we delete or remove your Data from our systems.
- Right to restrict our use of your Data – the right to “block” us from using your Data or limit the way in which we can use it.
- Right to data portability – the right to request that we move, copy or transfer your Data.
- Right to object – the right to object to our use of your Data including where we use it for our legitimate interests.

To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us via this email address: info@toolzo.com

It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which we hold it.

DISCLOSURE OF DATA

We may share personal data with our business partners for marketing, advertising or product/service offering purposes.

We disclose personal data if:

- we have your consent;
- we need to share it in order to provide you with the products and/or services you requested;
- we respond to a court order or in order to comply with the law,
- you violate our Terms and Conditions.

We may share your personal data with service providers that perform services for us, such as providing hosting services, marketing assistance, analyzing user data and for other legitimate purposes permitted by applicable law. If you agree to provide such information to these service providers directly, then your personal information will be subject to their privacy policies and terms of use.

SAFEGUARDING MEASURES

We will use technical and organizational measures to safeguard your Data, for example:

- access to your account is controlled by a password and a username that is unique to you.
- access to Website occurs only over a secured channel and may require two-factor authentication (2FA).
- we store your Data on secure servers and use the third party software component for access management security, which has been evaluated as conformant with the U.S. Federal Information Processing Standard (FIPS) 140-2 standards.
- payment details are encrypted using SSL (Secure Socket Layer) or TLS (Transport Layer Security) technology (typically you will see a lock icon or green address bar (or both) in your browser when we use this technology).

We adhere and/or are certified to the Payment Card Industry Data Security Standard (PCI DSS). This family of standards helps us manage your Data and keep it secure.

If you suspect any misuse or loss or unauthorised access to your Data, please let us know immediately by contacting us via this e-mail address: info@toolzo.com

CHILDREN

Please note that Toolzo Limited and its Website are not intended for children under the age of 16. We are committed with the protection of children's privacy, particularly in an online environment. To our best knowledge, we do not collect personally identifiable information from children under 16 without parental authorisation. If a parent or guardian becomes aware that his/her child has provided Data to Toolzo Limited without his/her authorisation, please contact us at info@toolzo.com.

TRANSFER OF PERSONAL DATA

Personal data in the European Union is protected by the General Data Protection Regulation (GDPR) but some other countries may not necessarily have the same high standard of protection for your personal data.

Some of our external third parties are based outside the European Economic Area (EEA). Our commitment is to transfer your personal data outside the EEA by ensuring that a similar level of protection is applied. We are transferring your personal data to countries that are deemed to provide an adequate level of protection for personal data. Where we use certain service providers, we may use specific contracts in line with the Data Protection Regulation.

CONSEQUENCES OF NOT PROVIDEING YOUR DATA

You are not obligated to provide your personal information to us, however, as this information is required for us to provide you with our services, we will not be able to offer some/all our services without it.

HOW LONG WE KEEP YOUR DATA

Unless a longer retention period is required or permitted by law, we will only hold your Data on our systems for the period necessary to fulfil the purposes outlined in this privacy policy or until you request that the Data be deleted. Even if we delete your Data, it may persist on backup or archival media for legal, tax or regulatory purposes. Your information is retained in electronic or paper format or both. When it is no longer required, it will be deleted or destroyed.

COOKIES

We use "cookies". The use of cookies is an industry standard, and you'll find cookies at most major websites.

A cookie is a small data file that a website can transfer to a visitor's hard drive to keep records of the visits to such site. A cookie contains information, such as your User Information, that helps us recognize the pages you have visited and improve future visits, but the only personal information a cookie can contain is the information that you provide yourself. A cookie cannot read data off of your hard drive or read cookie files created by other sites.

If you prefer not to accept a cookie, you can set your Web browser to refuse all cookies or to warn you before accepting a cookie. You can still access most of the features on our Website even without accepting a cookie.

CHANGES TO THIS POLICY

Toolzo Limited reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the privacy policy on your first use of the Website following the alterations.

COMPLAINTS, QUESTIONS, PROPOSALS

If you have any questions about this Privacy Policy, or if you wish to exercise your rights mentioned herein, please contact us via email address info@toolzo.com.