

Privacy Policy

Introduction: This Privacy Policy explains how the Company collects, uses, stores, shares and protects personal data. It also describes the rights of individuals and how they can exercise those rights. By interacting with the Company's services, websites or applications, you agree to the practices described in this policy.

1. Definitions

Personal Data is any information that identifies or can reasonably be linked to an individual (e.g., name, contact information, IP address, device identifiers).

Data Controller is the entity that determines the purposes and means of processing personal data. For the purposes of this policy, the Company acts as the data controller.

Data Processor is a third party that processes personal data on behalf of the Company under contract.

2. Data We Collect

We collect personal data in the following categories:

- **Contact Information:** Name, mailing address, email address, phone number and other identifiers used to contact you.
- **Account Credentials:** Usernames, passwords and authentication information.
- **Usage Data:** Information about how you interact with our websites, applications and services, including IP address, device identifiers, browser type, operating system and log data.
- **Financial and Transaction Data:** Payment information and purchase history if you transact with us.
- **Communications:** Records of your correspondence with us, feedback, survey responses and customer support

interactions.

- **Sensitive Data:** We do not intentionally collect sensitive personal data (e.g., health information, biometric data) unless required by law or explicitly provided by you with your consent. If sensitive data is collected, it will be protected with heightened security controls and used only for the stated purpose.

3. How We Use Personal Data

We use personal data for the following purposes:

- **Service Delivery:** To provide, operate and maintain our products and services, manage user accounts, process transactions and fulfill contractual obligations.
- **Communication:** To respond to inquiries, send administrative information such as confirmations or policy updates, and provide customer support.
- **Improvement and Analytics:** To analyze usage patterns, improve performance, develop new features and enhance user experience.
- **Marketing (with consent):** To send promotional communications, newsletters or offers that may be of interest. Users can opt out of marketing communications at any time.
- **Security and Fraud Prevention:** To monitor and protect against unauthorized access, data breaches, fraud and other security threats.
- **Legal Compliance:** To comply with applicable laws, regulations and legal processes, and to enforce our terms and policies.

4. Legal Basis for Processing

We process personal data based on one or more of the following legal grounds:

- **Consent:** When you have provided explicit consent for a specific purpose (e.g., receiving marketing emails).
- **Contractual Necessity:** When processing is necessary to

fulfill a contract with you or to take steps at your request before entering into a contract.

- **Legitimate Interests:** When processing is necessary for our legitimate business interests (e.g., improving services, preventing fraud), provided that your interests and fundamental rights do not override those interests.
- **Legal Obligation:** When we are required to process data to comply with a legal obligation.

5. Data Retention and Deletion

We retain personal data only as long as necessary to fulfill the purposes for which it was collected, including for satisfying legal, accounting or reporting requirements. Retention periods vary depending on the type of data and contractual or legal obligations. At the end of the retention period, data will be securely deleted or anonymized.

6. Sharing and Disclosure

We may share personal data with:

- **Service Providers:** Third-party vendors that provide services such as payment processing, data hosting, analytics, customer support or marketing assistance. These vendors process data on our behalf under contractual agreements that require appropriate security and confidentiality.
- **Business Partners:** When collaborating with other companies to offer co-branded or joint services, we may share data with your consent.
- **Legal Authorities:** We may disclose information when required by law, court order or government request, or to protect our rights, property or safety and that of our users or the public.
- **Corporate Transactions:** In the event of a merger, acquisition, reorganization or sale of assets, personal data may be transferred as part of the transaction.

7. International Transfers

We may transfer personal data to countries other than the country in which the data was collected, including to our service providers located in other jurisdictions. When we transfer data internationally, we will ensure appropriate safeguards are in place, such as Standard Contractual Clauses, to protect personal data as required by applicable laws.

8. Rights of Data Subjects

Depending on your jurisdiction, you may have the following rights regarding your personal data:

- **Access:** Request confirmation of whether we process your personal data and receive a copy of that data.
- **Rectification:** Request correction of inaccurate or incomplete personal data.
- **Deletion:** Request deletion of your personal data, subject to legal or contractual obligations that require retention.
- **Restriction:** Request restriction of processing in certain circumstances.
- **Portability:** Request that we provide your personal data in a structured, commonly used format or transmit it to another organization.
- **Object:** Object to processing based on legitimate interests or direct marketing.
- **Withdraw Consent:** Withdraw consent at any time when processing is based on consent. Withdrawal does not affect the lawfulness of processing before the withdrawal.

To exercise any of these rights, please contact us using the details provided below. We may need to verify your identity before processing your request.

9. Children's Privacy

Our services are not directed to children under the age of 13 (or as defined by applicable law). We do not knowingly collect personal

data from children without appropriate parental consent. If we become aware that a child's personal data has been collected without consent, we will take steps to delete it.

10. Cookies and Tracking Technologies

We use cookies and similar tracking technologies to personalize content, provide social media features and analyze our traffic. Where required by law, we obtain consent before placing non-essential cookies. You can manage cookie preferences through your browser settings or our cookie management tool.

11. Security Measures

We implement technical and organizational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access. Measures include encryption, access controls, network firewalls, regular security assessments and staff training. Despite these measures, no security system is completely secure; therefore, we cannot guarantee absolute security.

12. Changes to This Policy

We may update this Privacy Policy periodically to reflect changes in legal requirements, technology or our business practices. We will notify users of material changes through our website or other appropriate means. Where required by law, we will obtain consent for significant changes.

13. Contact Information

If you have questions or concerns about this Privacy Policy or our data practices, please contact us at:

Company Name: Multiply Co. LLC

Mailing Address: 6930 S Netherland Way, Aurora, CO 80016

Email: ali@multiply.io