**Privacy Policy** 

Last updated: August 5, 2025

Welcome to <a href="http://genboosoftware.com/">http://genboosoftware.com/</a> Privacy Policy.

**Genboo LLC** respects your privacy and is committed to protecting your personal data. This Privacy Policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

Please also use the Glossary to understand the meaning of some of the terms used in this Privacy Policy.

Important Information and Who We Are

## **Purpose of This Privacy Policy**

This Privacy Policy aims to give you information on how **Genboo LLC** collects and processes your personal data through your use of this website, including any data you may provide through this website when you contact us.

Please note that personal data processing taking place on other websites (either operated by **Genboo LLC** or any of its affiliates) are subject to separate privacy policies, which are available on those websites directly.

This website is not intended for children and we do not knowingly collect data relating to children under 13 years old.

It is important that you read this Privacy Policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements other notices and privacy policies and is not intended to override them.

### Controller

**Genboo LLC** is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this Privacy Policy).

#### **Contact Details**

If you have any questions about this Privacy Policy or our privacy practices, please contact our DPO in the following ways:

• Email address: info@genboosoftware.com

Postal address: 108 W. 13<sup>th</sup> Street, Suite 100, Wilmington, DE 19801, USA

You have the right to make a complaint at any time to the FTC: <a href="www.ftc.gov/complaint">www.ftc.gov/complaint</a>. We would, however, appreciate the chance to deal with your concerns before you approach FTC, so please contact us in the first instance.

## **Changes To The Privacy And Your Duty To Inform Us Of Changes**

We keep our Privacy Policy under regular review. This version was last updated on the date displayed in the header.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## **Third-Party Links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

### The Data We Collect About You

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

On this website, we may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Technical Data includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- Identification data includes contact data you might provide to us for communication purposes, data deriving from your social media if you decide to connect your account to such social networks.

On this website, we do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your

health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### **How Is Your Personal Data Collected?**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your identity and contact data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you give us feedback or contact us.
- Automated technologies or interactions. As you interact with our website, we will automatically collect Technical and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs, and other similar technologies. Please see our Cookie Policy for further details.

### How We Use Your Personal Data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.
- Enable user-to-user communications
- Perform business activities as needed.

### Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see Cookie Policy.

## Disclosures Of Your Personal Data

We may share your personal data with the parties set out below for the purposes set out above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.

### **Data Retention**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

# **Your Legal Rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to the processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

### Glossary

### **Lawful Basis**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Complying with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

#### **Third Parties**

**External Third Parties:** Service providers who provide IT and system administration services, or web analytics. Professional advisers, including lawyers, bankers, auditors and

insurers, who provide consultancy, banking, legal, insurance and accounting services. Tax authorities, regulators, and other authorities, who require reporting of processing activities in certain circumstances.

## Information for California Resident

If you are a California resident, you have the following special rights under the California Consumer Privacy Act ("CCPA") in addition to any other rights outlined in this Privacy Policy.

Please note that we do not "sell" your personal data, as that term is defined in CCPA.

# 1. Your Right to "Know" and to Request Deletion

You have the right to know the categories and specific pieces of personal data we have collected about you. You have the right to know the categories of sources from which the personal data has been collected, the business or commercial purpose for collecting or selling personal data, and the categories of third parties with whom we share personal data.

You also have the right to request deletion of personal data we've collected or maintain. Please note this right is subject to certain exceptions, including without limitation our retaining information as necessary to protect against malicious, deceptive, fraudulent, or illegal activity, to comply with our legal obligations, and for other internal purposes.

To exercise these rights contact us as provided in section 9 "How to Contact Us?" below. You can also exercise your right to deletion by selecting "Forget my Data" in the "Privacy Settings" section of your account settings. Please note that any requested disclosures in connection with a request to know will only apply to the 12-month period preceding the request, and you are entitled to request disclosure twice in any 12-month period. You may also download your data as provided on our website, or exercise your right to delete by deleting your account as provided in your account settings.

## 2. Personal Information Disclosed

You also have the right to know what categories of personal data we've disclosed for a business purpose, and the third parties to whom that information was disclosed. In the past 12 months, we've disclosed for a business purpose the following categories of information to the following parties: Usage/device information (including, without limitation, your IP address, as the case may be) to our business intelligence and analytics service providers (e.g., Hotjar, Google

Analytics); Payment/transaction data to our customer/payment service providers; Contact information, device/usage information (including, without limitation, your IP address and the website you are coming from, as the case may), information relating to the purchase made (excluding any data relating to your mean of payment, such as credit card information) and information as regards your interactions with the emails we sent to our marketing and sales partners (e.g. Emarsys, marketing partners promoting our site); and identification information, contact information, device and usage information, payment information (as the case may be) to our antifraud service providers and auditing service providers.

# 3. Your Right to Non-Discrimination

You have the right not to receive discriminatory treatment for the exercise of the privacy rights conferred by CCPA, including but not limited to by denying you services, charging different prices or rates, or providing you with a different level or quality of services. Please note, however, that the exercise of some of your rights (e.g., to delete your data) may render it impossible for us to continue to deliver services to you.

# 4. Your Right to Use an Authorized Agent

You have the right to designate an authorized agent to make a request under the CCPA on your behalf. To designate an authorized agent, please contact us as provided in section 9 "How to Contact Us?" below. In order to verify you have authorized an agent we may require a signed, written authorization from you.

### 5. Do Not Track

Some browsers have a "do not track" feature that lets you tell websites you do not want to have your online activities tracked. Because these features are not yet uniform, we do not presently respond to "do not track" signals. We will however treat any "do not sell" or similar signals as opt-out requests under CCPA