# **Privacy Policy**

This Privacy Policy ("Privacy Policy") explains how Douro Labs LLC ("we", "us", "our") collects, uses, shares, and protects user ("you", "your") Personal Information when you visit and interact with our website, services, and software (collectively, "Services"). "Personal Information" means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

Please read this Privacy Policy carefully. By using our Services, you agree to the processing of your information in accordance with this Privacy Policy.

#### 1. Information Collection and Processing

# a. Types of Personal Information Collected

Depending on how you interact with the Services, we may collect and process the following information:

- Personal identifiers such as your name, address, email address, date of birth, contact information, business information, financial information, relevant government issued identification numbers such as your Social Security Number or driver's license number, or other reference information you choose to provide;
- ii. Credit card or bank information;
- iii. Information about your computer and internet connection, including, but not limited to, the type of device you use, the IP address of your device, your operating system, the type of Internet browser you use, unique device identifiers and other diagnostic data; and
- iv. Usage data and automatically collected technical information such as traffic data, logs, and other communication data and the resources that you access and use on the Service.

When you communicate with us, we may collect and save a record of your communication and any Personal Information provided during the communication.

## b. Sources of Personal Information

We collect Personal Information from various sources including data directly from you, from third parties (including Stripe), from public sources, and from automated systems.

# c. Processing of your Personal Information

i. We process your data for entering into a contract with you, perform and administer it (e.g., your contact data, credit card information, and further information provided by you; information when using our services and/or with regard to a possible conclusion of a contract; information about the execution and administration of the contracts; information about defects, complaints and contract amendments; financial data; information about

- downloads of offers, information, brochures, etc. that you have made; etc.).
- ii. In addition, where we asked for your consent (e.g., completing intake forms), we process your data based on such consent. Where we did not ask for your consent and where required under applicable law, we process your data on other legal grounds, such as:
  - contractual obligation
  - A legal obligation
  - a vital interest of the data subject or of another natural person
  - to perform a public task
  - our legitimate interest.

#### 2. Use of Personal Information

We use the information we collect to:

- a. Provide, maintain, promote, market, and improve our Services.
- b. Respond to your comments, questions, and requests.
- c. Conduct research and analysis for product development and improvements.
- d. Send you technical notices, updates, security alerts, and administrative messages.

#### 3. Disclosure of Personal Information

Personal Information may be shared in the following circumstances:

#### a. Service providers

We may disclose Personal Information to third-party service providers who use this information to perform services for us, such as hosting providers, auditors, advisors, consultants, customer service and/or support providers and other similar service providers.

#### b. Advertising, Ecosystem, and Marketing Partners

We may share Personal Information with third parties that provide marketing and advertising, campaign measurement, online and/or mobile analytics, and related services. These third parties may receive or access browsing and/or other data about your use of the Services in order to help us better reach individuals with relevant ads and/or measure our ad campaigns, and/or to better understand how individuals interact with our Services over time and across devices, or to provide their own services.

## c. Law Enforcement

Under certain circumstances, we may be required to disclose your Personal Information if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

#### d. Legal Requirements

We may disclose your Personal Information in the good faith belief that such action is necessary to comply with a legal obligation, to protect and defend our rights and property, prevent or investigate possible wrongdoing in connection with the Service, or to protect against legal liability.

#### e. Business Transfers

We may disclose and/or transfer Personal Information as part of any actual or contemplated merger, sale, transfer of assets, acquisition, financing and/or restructuring of all or part of our business, bankruptcy or similar event, including related to due diligence conducted prior to such event where permitted by law.\

#### 4. Cookies

We may use cookies to operate and optimize our website. These are text files that are stored on your device (computer; laptop; smartphone; etc.) and that are necessary for the use of the Website as such or certain functions or that enable the analysis of the use of our website. You can configure your browser in such a way that no cookies are stored on your computer or a message always appears before a cookie is installed. Complete deactivation of cookies may result in our website not functioning or not functioning completely.

# 5. Security of Data

The security of your data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security. We also have procedures to deal with any suspected Personal Information breach, and we will notify you and any applicable regulator when we are legally required to do so.

# 6. How Long Do We Keep Your Data?

We only process your data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of complying with legal retention requirements and where required to assert or defend against legal claims, until the end of the relevant retention period or until the claims in question have been settled. Upon expiry of the applicable retention period we will securely destroy your data in accordance with applicable laws and regulations.

#### 7. Links to Other Sites

Our Service may contain links to other sites that are not operated by us. If you click a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

#### 8. Children's Privacy

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your child has provided us with Personal Information, please contact us. If we become aware that we have collected Personal Information from children without verifiable parental consent, we will take steps to remove that information from our servers.

# 9. Your Choices Your Rights

To the extent provided for by applicable law, you may request information free of charge about the data stored relating to you, its origin and recipients and the purpose of the data processing. You may also have the right to correction, deletion, restriction or objection to processing, as well as to the transfer of the data to another controller.

Furthermore you can revoke your consent at any time with effect for the future. All you need to do is send us an informal e-mail.

Please note that the foregoing rights are subject to legal restrictions and may interfere with or make impossible the provision of our services.

## 10. Changes to This Privacy Policy

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of the policy and, in some cases, we may provide you with additional notice.

## 11. Contacting us

If you have any questions about this Privacy Policy, please contact us at legal@dourolabs.xyz.