

Privacy policy

Data Factory CJSC (also referred to below as the "**Firm**," "**we**," "**us**," or "**our**") is committed to protecting the privacy of visitors to commada.io (the "**Website**"), contacts for our clients and prospective clients, contacts for suppliers of goods and services to the Firm, and any other individuals (collectively "**you**") about whom the Firm obtains personal data (described below). This Privacy Policy explains what personal data (as defined below) we collect, how we use and share that data and your choices concerning our data practices.

This Privacy Policy applies to our website, <https://www.commada.io>, and its associated subdomains (collectively, our "**Service**"). By accessing or using our Service, you signify that you have read, understood, and agree to our collection, storage, use, and disclosure of your personal information as described in this Privacy Policy and our Terms of Service.

Unless we specifically state otherwise, the Firm is the data controller in relation to any Personal Data that the Firm processes about you and is therefore responsible for ensuring that the systems and processes we use are compliant with data protection laws, to the extent applicable to us, including the, but not limited to, European Union General Data Protection Regulation, RA Law on the Personal Data Protection and the California Consumer Privacy Act of 2018.

Please review this Privacy Policy periodically as we may revise it **without notice**.

1. Personal Data We Collect

When you interact with the Website, we collect information that, alone or in combination with other information, could be used to directly or indirectly identify you ("**Personal Data**"). This includes things like your name, postal address, telephone number, and email address, as well as less obvious information, which are included in the following defined categories.

Information You Provide

We collect information you provide to us which includes:

VISITING OUR WEBSITE	Device identifiers (including IP address); The domain name of the Website that directed you to our Website; The number of times you have visited our Website;
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REGISTRATION INFORMATION	When you sign up for or use the Services, you voluntarily give us certain Personal Data, including your name, email address, username. If you register for an account through your social media account (including Facebook and Google Sign-in) the information we get from these accounts depends on your settings and the privacy policies of the social media platforms, so please check those policies to understand the privacy practices of those platforms.
BILLING AND PAYMENT INFORMATION	When you purchase a subscription, we collect certain payment and identity verification information, including your name, email address, physical address, and credit card information. For billing purposes, we may use service providers which are in compliance with respective PCI/DSS compliance.
PERSONAL DATA YOU POST ON OR PROVIDE WHILE USING OUR SERVICES	We may collect personal data when you post comments or other user content to our Services, which may include your username or screen name, comments, likes, interests, status, pictures, and references to your online presence. We may collect audio or visual information such as photos, videos or recordings you choose to post to our Apps or provide by granting us access to your camera or microphone while using interactive features of our Services. We may occasionally ask for your consent whilst accessing your photo galleries.
YOUR CORRESPONDENCE AND YOUR FEEDBACK ABOUT OUR SERVICES	We collect information you provide when you contact us directly or provide feedback, comments, or suggestions on our Services directly to us.
INFORMATION YOU PROVIDE WHEN YOU DO BUSINESS WITH US	If you are our vendor, service provider, or business partner, we may collect information about you and the services you provide, including your or your employees' business contact information and other information you or your employees provide to us as part of the services you may provide and our agreement with you.

We also collect, use, and disclose aggregated or de-identified information that does not reasonably identify you or your device, and is not considered Personal Information.

2. Information CollectedAutomatically

When using our Services, including on third-party platforms, we, and our service providers operating on our behalf, may automatically collect or receive certain information associated with you or your network device(s), such as your computer, mobile devices or other streaming devices. This includes information about your use of our Services and your preferences. Such information may be automatically collected through device-based tracking technologies such as cookies, pixels, tags, beacons, scripts, or other technology. For more information about cookies or other tracking technologies and the choices you have regarding the use of them, please visit our Cookie Policy.

3. How We Use PersonalData

We use the personal data we collect, described above:

- **To provide advice and administer our client relationships,** we use Personal Data that you voluntarily submit to us on the Website or during the course of our engagement, regardless of the media used, such as identification data, contact details, and other data that we may process in connection with the provision of legal services.
- **To provide relevant marketing,** for example, we may use Personal Information to provide marketing and promotional information about products and services that We offer. Information you have provided to third parties may be combined with information we already have about you and may be used to create more tailored advertising and products. For information about how you can opt-out of receiving marketing communications from us at any time, or withdraw your consent to receive such communications, see the section titled "Your Data Privacy Rights."
- **To address compliance and legal obligations,** such as complying with the Firm's tax reporting obligations, checking the identity of new clients, and preventing money laundering and/or fraud, we use identification data, transaction data, compliance data, and device data. This processing is necessary to comply with legal requirements that apply to the Firm. In addition, job applicant data and compliance data may be used as necessary to comply with legal, regulatory, and corporate governance requirements to which we are subject to.
- **To improve our Website.** For example, we may use Personal Information to administer our Website and for internal operations of the Website, including troubleshooting, data analysis, testing, research, and statistical purposes, to improve user experience and as a part of our efforts to keep our websites safe and secure. We use cookie and device data. This processing is necessary for our legitimate interests to constantly monitor the functionality and user-friendliness of our Website and improve our online presence and services to you.
- **Fraud Prevention.** For example, we may use Personal Information to prevent, protect against, investigate, or prosecute any fraud, abuse, or other misuse or illegal activity using our products or services.

4. Data subject rights

Under certain circumstances and in compliance with applicable laws, you have the right to:

- **Access.** Subject to certain exceptions, you have the right to request a copy of the Personal Data we are processing about you, which we will provide to you in electronic form. At our discretion we may require you to prove your identity before providing the requested information. If you require multiple copies of your Personal Data, we may charge a reasonable administration fee.
- **Rectification.** You have the right to require that any incomplete or inaccurate Personal Data that we process about you is amended.
- **Deletion.** You have the right to request that we delete Personal Data that we process about you, unless we are required to retain such data in order to comply with a legal obligation or to establish, exercise or defend legal claims.
- **Restriction.** You have the right to request that we restrict our processing of your Personal Data where:
 - you believe such data to be inaccurate;
 - our processing is unlawful; or
 - we no longer need to process such data for a particular purpose, but where we are not able to delete the data due to a legal or other obligation or because you do not want us to delete it.
- **Portability.** You have the right to request that we transmit the Personal Data we hold in respect of you to another data controller, where this is:
 - Personal Data which you have provided to us;
 - and we are processing that data on the basis of your consent or in order to perform our obligations under contract to you (such as to provide legal services).
- **Objection.** Where the legal justification for our processing of your Personal Data is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless we have compelling legitimate grounds for the processing which override your interests and rights, or if we need to continue to process the data for the establishment, exercise or defence of a legal claim.
- **Withdrawing Consent.** If you have consented to our processing of your Personal Data, you have the right to withdraw your consent at any time, free of charge

Please note that some of these rights may be limited where we have an overriding interest or legal obligation to continue to process the personal information or where data may be exempt from disclosure due to reasons of legal professional privilege or professional secrecy obligations.

5. Sharing and Disclosure

We may share your Personal Data and other information with certain third parties in the following circumstances:

- **Business Transfers:** If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of all or a portion of our assets, or transition of a service to another provider, your Personal Data and other information may be transferred to a successor or affiliate as part of that transaction.
- **Legal Requirements:** If required to do so by law, applicable regulation or in the good faith belief that such action is necessary to (i) comply with a legal obligation, (ii) protect and defend the rights or property of Peralingo, (iii) act in urgent circumstances to protect the personal safety of users of the Apps, or the public, or (iv) protect Peralingo against legal liability.

6. *Data Retention*

We will keep your Personal Data for as long as reasonably necessary for the purposes described in this Privacy Policy, while we have a legitimate business need to do so, or as required by law (e.g. for tax, legal, accounting or other purposes), whichever is the longer.

COOKIES AND OTHER TECHNOLOGIES

We use and engage certain providers to use cookies, web beacons, and similar tracking technologies (collectively, "**cookies**") on our Website. This data helps us to understand our users' behavior, web searches, and where on our website's users have visited. We use cookies to distinguish among different users of our Website, to help us provide you with a good experience when you browse our websites, and to allow us to improve our websites.

Cookies are small amounts of data that are stored on your browser, device, or the page you are viewing. Some cookies are deleted once you close your browser, while other cookies are retained even after you close your browser so that you can be recognized when you return to a website. More information about cookies and how they work is available at <http://www.allaboutcookies.org>.

Every cookie falls within one of the following categories:

- **Necessary cookies:** Without these cookies we cannot provide many services that you need on the website. They help make a Website usable by enabling basic functions like page navigation and access to secure areas of the Website. The Website cannot function properly without these cookies. For example, **Necessary** cookies help remember your preferences as you move around the website.
- **Analytics/Performance cookies.** These cookies track information about visits to the website so that we can make improvements and report our performance. For example: analyze visitor and user behavior to provide more relevant content or suggest certain activities.
- **Functionality cookies.** These cookies are used to remember information you have entered or choices you make (such as your username, language or your region) on the website, so the next time you visit the website you will not have to set them again.
- **Marketing cookies.** These are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual visitor and thereby more valuable for publishers and third-party advertisers.

What are your options if you do not want cookies on your computer?

You can control the use of cookies by changing your browser settings. Some browsers limit or delete cookies, so you may want to review your cookie settings and ads settings. For more information on how to remove cookies as well as other useful information related to the use of cookies, visit the website <http://www.allaboutcookies.org>.

7. *Rights Under EULaw*

Scope. This section provides information on your rights under EU law (for these purposes, reference to the EU also includes the European Economic Area countries of Iceland, Liechtenstein and Norway).

Data Controller. Data Factory CJSC is the data controller for your Personal Data. To find out our registered office, please see the “Contact us” section herein.

Your Rights. Subject to General Data Protection Regulation (GDOR), you have the following rights in relation to your Personal Data:

- **Right of access:** You can access your personal information associated with your account by visiting your account privacy settings. You can request a copy of your personal information in an easily accessible format and information explaining how that information is used;
- **Right to rectification:** If your Personal Data is inaccurate or incomplete, you are entitled to ask that we correct or complete it. You can also do this yourself via your user settings.
- **Right to erasure:** You may ask us to erase your Personal Data in some circumstances, such as where we no longer need it or you withdraw your consent (where applicable). You can also do this yourself via your user settings on the Apps.
- **Right to restrict processing:** You may ask us to restrict or ‘block’ the processing of your Personal Data in certain circumstances, such as where you contest the accuracy of the data or object to us processing it (please read below for information on your right to object). We will tell you before we lift any restriction on processing. If we shared your Personal Data with others, we will tell them about the restriction where possible. If you ask us, and where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so you can contact them directly.
- **Right to data portability:** You have the right to obtain your Personal Data from us that you consented to give us or that was provided to us as necessary in connection with our contract with you. We will give you your Personal Data in a structured, commonly used and machine-readable format. You may reuse it elsewhere.
- **Right to object:** If we process your information based on our legitimate interests or in the public interest, you can object to this processing in certain circumstances. In such cases, we will cease processing your information unless we have compelling legitimate grounds to continue processing or where it is needed for legal reasons.
- **Rights in relation to automated decision-making and profiling:** You have the right to be free from decisions based solely on automated processing of your Personal Data, including profiling, unless this is necessary in relation to a contract between you and us or you provide your explicit consent to this use.
- **Right to withdraw consent:** If we rely on your consent to process your Personal Data, you have the right to withdraw that consent at any time, but this will not affect any processing of your data that has already taken place.

- **Right to lodge a complaint with the data protection authority:** If you have a concern about our privacy practices, including the way we handled your Personal Data, you can report it to the data protection authority that is authorized to hear those concerns.

CHILDREN'S PRIVACY PROTECTION

We understand the importance of protecting children's privacy in the interactive online world. This Website is not designed for or intentionally targeted at children 13 years of age or younger. It is not our policy to intentionally collect or maintain information about anyone under the age of 13

8. Security of your information

We take reasonable administrative and technical steps to protect the Personal Data from loss, misuse and unauthorized access, disclosure, alteration, or destruction. However, no method of transmission over the internet is 100% secure. Therefore, while we strive to protect your data, we cannot guarantee its absolute security. You transmit and receive all such information at your own risk.

WE PROVIDE ANY AND ALL SERVICES AND INFORMATION ON AN "AS IS" BASIS AND GRANT NO WARRANTIES OF ANY KIND, EXPRESS, IMPLIED OR STATUTORY. WE SPECIFICALLY DISCLAIM ANY IMPLIED WARRANTIES OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, OR NON-INFRINGEMENT.

9. How to Contact Us and Exercise Your Rights:

If you would like to exercise your rights or if you have any questions or concerns regarding the Privacy Policy please contact us through our Contact us page. If you would prefer to submit your questions or comments by mail, please send a letter to the address below:

support@commada.io

If we are unable to resolve your request, you may also have the right to lodge a complaint before the proper regulatory authority in your jurisdiction.