

## Privacy Policy

Last modified: November 12, 2020

### **Introduction**

Renetec, Inc. (the “**Company**,” “**we**,” “**us**” or “**our**”) respects your privacy and is committed to protecting it through our compliance with this policy.

This policy describes the types of information that we may collect from you or that you may provide when you visit, access and use our products and services, including [www.renetec.io](http://www.renetec.io) and any content, functionality, web applications and software offered on or through such website or otherwise by us from time to time (collectively, the “**Services**”) and our practices for collecting, using, maintaining, protecting and disclosing that information.

This policy applies to information that we collect:

- On or through the Services;
- In email, text and other electronic messages between you and us;
- Through mobile and desktop applications that you use or download from the Services, which provide dedicated non-browser-based interaction between you and the Services; and
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.

This policy does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by Company or any third party; or
- Any third party, including through any application or content (including advertising) that may link to or be accessible from or on the Services.

**Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, then your choice is not to use the Services.**

**By accessing or using the Services, you agree to this privacy policy.**

This policy may change from time to time (see

**Changes to Our Privacy** Policy). Your continued use of the Services after we make changes this policy is deemed to be acceptance of those changes, so please check the policy periodically for updates.

### **Children Under the Age of 18**

The Services are not intended for children under 18 years of age. No one under age 16 may provide any information to, through or on the Services. We do not knowingly collect personal information from children under 18. If you are under 18, then do not: (i) use or provide any

information to the Services or on or through any of its features; (ii) register on the Services; (iii) make any purchases through the Services; (iv) use any of the interactive or public comment features of the Services; or (v) provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn that we have collected or received personal information from a child under 18 without verification of parental consent, then we will delete that information. If you believe that we might have any information from or about a child under 18, then please contact us at [info@renetec.io](mailto:info@renetec.io).

California residents under 18 years of age may have additional rights regarding the collection and sale of their personal information. Please see

**[Your California Privacy](#)** Rights for more information.

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## **Information We Collect About You and How We Collect It**

We collect several types of information from and about users of the Services, including information:

- By which you may be personally identified, such as your name, postal address, e-mail address, telephone number and any other identifier by which you may be contacted online or offline (“**personal information**”);
- That is about you, but individually does not identify you, such as your IP address, unique device ID, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use the Services and other technical information; and/or
- About your Internet connection, the equipment that you use to access the Services and usage details.

We collect this information:

- Directly from you when you provide it to us;
- Automatically as you navigate through the Services. Information collected automatically may include usage details, IP addresses and information collected through cookies, web beacons and other tracking technologies; and/or
- From third parties, for example, our business partners, public databases, joint marketing partners and social media platforms.

## **Information You Provide to Us**

The information that we collect on or through the Services may include:

- Information that you provide by filling in forms on the Services. This includes information provided at the time of registering to use the Services, subscribing to the Services, posting material, requesting further services and making payments. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with the Services;
- Credentials, such as passwords, password hints and similar security information used for authentication and account access;
- Records and copies of your correspondence (including email addresses), if you contact us;
- Your responses to surveys that we might ask you to complete for research purposes;
- Details of transactions that you carry out through the Services and of the fulfillment of your orders. You may be required to provide financial information before placing an order through the Services;
- Your search queries on the Services;

- If we provide you with the option to register using social media or other third-party account details, then we will collect the information described below. *See How We Handle Your Social Logins*; and/or
- Other applicable information that you may provide to us from time to time in connection with the Services.

You also may provide information to be published or displayed (hereinafter, “**posted**”) on public areas of the Services, or transmitted to other users of the Services or third parties (collectively, “**User Contributions**”). Your User Contributions are posted on and transmitted to others at your own risk. Although we may limit access to certain pages, and in certain cases you may be allowed to set certain privacy settings for such information by logging into your account profile, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Services with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

**All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.**

### *Information We Collect Through Automatic Data Collection Technologies*

As you navigate through, use and interact with the Services, we may use automatic data collection technologies to collect certain information about your use of the Services, including your equipment, browsing actions and patterns, including:

- Details of your visits to and use of the Services, including traffic data, location data, logs and other communication data and the resources that you access and use on the Services; and
- Information about your computer and Internet connection, including your IP address, operating system and browser type.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (i.e., behavioral tracking). Click here: [Do Not Track \(DNT\)](#) for information on how you can opt out of behavioral tracking on the Services and how we respond to web browser signals and other mechanisms that enable consumers to exercise choice about behavioral tracking.

The information that we collect automatically may include statistical data and personal information, or we may maintain it or associate it with personal information that we collect in other ways or receive from third parties. It helps us to improve the Services and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns;
- Store information about your preferences, allowing us to customize the Services according to your individual interests;
- Speed up your searches; and
- Recognize you when you return to the Services.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting then you may be unable to access certain parts of the Services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to the Services;
- **Flash Cookies.** Certain features of the Services may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from and on the Services. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see
- ***Choices About How We Use and Disclose Your*** Information; and
- **Web Beacons.** Pages of the Services and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).
- For more information about how we use cookies and similar technologies to recognize you when you visit the Services, please see our ***Cookie Policy***.

### **Third-Party Use of Cookies and Other Tracking Technologies**

Some content or applications, including advertisements, on the Services may be served by third-parties from time to time, including advertisers, ad networks and servers, content providers and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use the Services. The information that they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, then you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see

***Choices About How We Use and Disclose Your*** Information.

### **How We Use Your Information**

We use information that we collect about you or that you provide to us, including any personal information:

- To present the Services and its contents to you;

- To provide you with information, products and/or services that you request from us;
- To fulfill any other purpose for which you provide it, including to facilitate account creation and login;
- To provide you with notices about your account or subscription, as applicable, including expiration and renewal notices;
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;
- To notify you about changes to the Services or any products or services we offer or provide through it;
- To allow you to participate in interactive features on the Services;
- To enable user-to-user communications;
- For other business purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve the Services, products, services, marketing and your experience;
- In any other way we may describe when you provide the information; and
- For any other purpose with your consent.

We may also use your information to contact you about our own and third-parties' goods and services that may be of interest to you. If you do not want us to use your information in this way, then please check the relevant box located on the form on which we collect your data (e.g., the order form or registration form), adjust your user preferences in your account profile, if applicable, or send to us an e-mail stating your request to [info@renetec.io](mailto:info@renetec.io). For more information, see

**Choices About How We Use and Disclose Your Information.**

We may use the information that we have collected from you in order to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, then the advertiser may assume that you meet its target criteria.

**How Long We Keep Your Information**

We will keep the information that we have collected for as long as necessary to fulfill the purposes outlined in this policy unless otherwise required by law. No purpose in this policy will require us to keep your personal information for longer than two (2) years past the termination of your user account.

**How We Handle Your Social and Third-Party Account Logins**

The Services may offer to you the ability to register and login using your third-party social media, cloud and/or other third-party account details. If you choose to register or log into the Services using such account(s), then we may have access to certain information about you.

Where you choose to do this, we will receive certain profile information about you from your account provider. Such profile information may vary depending on the account provider, but often will include your name, e-mail address, friends list, profile picture and other information that you choose to make public. If you login using Facebook, Twitch, Google, iCloud, Dropbox, Box or other social media, cloud or other third-party account, then we may also request access to other permissions related to your account, such as friends, check-ins and likes, and you may choose to grant or deny us access to each individual permission.

Please note that we do not control and are not responsible for other uses of your personal information by your third-party account providers. We recommend that you review their respective privacy policies to understand how they collect, use and share your personal information and how you can set your privacy preferences on their websites and apps.

### **Disclosure of Your Information**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or that you provide as described in this privacy policy:

- To our subsidiaries and affiliates, which include joint venture partners or other companies that we control or that are under common control with us;
- To contractors, service providers and other third parties that we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them. Examples include: payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts;
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by the Company about the Services users is among the assets transferred;
- To third parties to market their products or services to you if you have consented to or not opted out of these disclosures. For more information, see
- **Choices About How We Use and Disclose Your** Information;
- To fulfill the purpose for which you provide it. For example, if you give us an email address to use a "share" feature of the Services, then we will transmit the contents of that email and your email address to the recipients;
- To other users. For example, when you share personal information (by posting comments, contributions or other content to the Services) or otherwise interact with public areas of the Services, such personal information may be viewed by all users and may be publicly distributed outside of the Services in perpetuity.
- For any other purpose disclosed by us when you provide the information; and

- With your consent.

We also may disclose your personal information:

- To comply with any court order, law or legal process, including to respond to any government or regulatory request;
- To enforce or apply our *Terms of Use* and other agreements, including for billing and collection purposes; and
- If we believe that disclosure is necessary or appropriate to protect the rights, property or safety of the Company, our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

### **Choices About How We Use and Disclose Your Information**

We strive to provide you with choices regarding the personal information that you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, then please note that some parts of the Services then may be inaccessible or not function properly;
- **Disclosure of Your Information for Third-Party Advertising.** If you do not want us to share your personal information with unaffiliated or non-agent third parties for promotional purposes, then you can opt-out by checking the relevant box located on the form on which we collect your data (i.e., the order form or registration form), logging into the Services and adjusting your user preferences in your account profile by checking or unchecking the relevant boxes, as applicable, or by sending to us an email stating your request to [info@renetec.io](mailto:info@renetec.io);
- **Promotional Offers from the Company.** If you do not wish to have your email address or other contact information used by the Company to promote our own or third parties' products or services, then you can opt-out by checking the relevant box located on the form on which we collect your data (i.e., the order form or registration form), logging into the Services and adjusting your user preferences in your account profile by checking or unchecking the relevant boxes, as applicable, or by sending to us an email stating your request to [info@renetec.io](mailto:info@renetec.io). If we have sent to you a promotional email, then you may send us a return email asking to be omitted from future email distributions. This opt out does not apply to information provided to the Company as a result of a product purchase, warranty registration, product service experience or other transactions; and
- **Targeted Advertising.** If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target-audience preferences, then you can opt-out by sending us an e-mail stating your request to [info@renetec.io](mailto:info@renetec.io).

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative (“NAI”) on the NAI’s website.

California residents may have additional personal information rights and choices. Please see ***Your California Privacy*** Rights for more information.

### **Accessing and Correcting Your Information**

You can review and change your personal information by logging into the Services and visiting your account profile page. You may also send us an email at [info@renetec.io](mailto:info@renetec.io) to request access to, correct or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to change information if we believe that the change would violate any law or legal requirement or cause the information to be incorrect.

If you delete your User Contributions from the Services, then copies of your User Contributions may remain viewable in cached and archived pages, or might have been copied or stored by other Website users. Proper access and use of information provided on the Services, including User Contributions, is governed by our *Terms of Use*.

California residents may have additional personal information rights and choices. Please see ***Your California Privacy*** Rights for more information.

### **Your California Privacy Rights**

If you are a California resident, then California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, visit [https://downloads.renetec.io/legal/ccpa\\_notice.pdf](https://downloads.renetec.io/legal/ccpa_notice.pdf).

California’s “Shine the Light” law (Civil Code Section § 1798.83) permits users of our Services that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to [info@renetec.io](mailto:info@renetec.io) or write us at: 1030 E El Camino Real, #121, Sunnyvale, CA 94087.

### ***Do Not Track (DNT)***

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting that you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. No uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online.

## **Data Security**

We have implemented appropriate technical and organizational measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure. All information that you provide to us is stored on our secure servers behind firewalls. Any payment transactions will be encrypted using SSL technology.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of the Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Services like message boards. The information you share in public areas may be viewed by any user of the Services.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to the Services. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Services.

## **Changes to Our Privacy Policy**

It is our policy to post any changes that we make to our privacy policy on this page with a notice that the privacy policy has been updated on the Legal page at <http://renetec.io/legal>. If we make material changes to how we treat our users' personal information, then we will notify you by email to the email address specified in your account and/or through a notice on the Services home page. The date that the privacy policy was last revised is identified at the top of this page. You are responsible for ensuring that we have an up-to-date active and deliverable email address for you, and for periodically visiting the Services and this privacy policy to check for any changes.

## **European Union Users**

In some regions (like the European Economic Area), you may have certain rights under applicable data protection laws. These may include the right to (i) request access and obtain a copy of your personal information, (ii) request rectification or erasure, (iii) restrict the processing of your personal information and (iv) if applicable, data portability. In certain circumstances, you also may have the right to object to the processing of your personal information. To make such a request, please use the contact details provided below. We will consider and act upon any request in accordance with applicable data protection laws. If we are relying on your consent to process your personal information, then you have the right to withdraw your consent at any time. Please note, however, that this will not affect the lawfulness of the processing before its withdrawal.

Data protection law in Europe requires a "lawful basis" for collecting and retaining personal information from citizens or residents of the European Economic Area. Our lawful bases include, without limitation:

- Performing the contract that we have with you and/or other users: in certain circumstances, we need your personal data to comply with our contractual obligation to deliver the Services, products and services to you and/or other users;
- Legal compliance: sometimes, the law says we need to collect and use your data. For example, tax laws require us to retain records of transactions and payments made through the Services; and
- Legitimate interests: this is a technical term in data protection law which essentially means that we have a good and fair reason to use your personal information and data and we do so in ways which do not hurt your interests and rights. We sometimes require your personal information and data to pursue our legitimate interests in a way that might reasonably be expected as part of running our business and that does not materially impact your rights, freedom or interests. For example, we use identity, device and location information to prevent fraud and abuse and to keep the Services and our products and services secure. We also may send to you promotional communications about the Services and our products and services, subject to your right to control whether we do so. We analyze how users interact with the Services and our products and services, so that we can understand better what elements of the Services and our products and services, including their designs, are working well and which are not working so well. This allows us to improve and develop the quality of the online experience that we offer all our users.

### ***Data Protection Authority***

Subject to applicable law, if you are a citizen or resident of the European Economic Area, then you also have the right to (i) object to the Company's use of your personal information and (ii) lodge a complaint with your local data protection authority or the United Kingdom Information Commissioner's Office, which is the lead supervisory authority in the European Union:

United Kingdom Information Commissioner's Office  
Wycliffe House, Water Lane, Wilmslow, Cheshire  
SK9 5AF, United Kingdom  
Telephone: +0303 123 1113  
Fax: 01625 524510  
Web: <https://ico.org.uk/global/contact-us/>

### ***Data Transfers***

Because the Company is a US-based company, your information will be collected and processed in the United States. The United States has its own laws governing data protection and government access to information. The rules that protect your personal information under United States law may be different than in your home country. If you choose to use the Services, Products and Services, then you need to agree to our ***Terms of Use***, which set out the contract between the Company and its users.

## **Contact Information**

To ask questions or comment about this privacy policy and our privacy practices, then you may contact our Data Protection Officer (DPO), Sasha Shturma at:

1030 E El Camino Real, #121,

Sunnyvale CA 94087

sasha@renetec.io