

RGaEX Privacy Policy

RGaEX (the “Firm”, “we”, “us”, or “our”) are committed to protecting your personal information and your right to privacy. This privacy policy (the “Privacy Policy”) describes the ways we collect information from and about you, how we use it and what rights you have in relation to it, so that you may decide whether or not to provide information to us. If there are any terms in this Privacy Policy that you do not agree with, please discontinue use of our site and our services. By accessing our website or purchasing our products and/or using our services you agree to this Privacy Policy in addition to any other agreements we might have with you. In the event that such agreements contain terms that conflict with this Privacy Policy, the terms of those agreements will prevail. This Privacy Policy does not govern the practices of entities that our Company does not own or control, or entities that do not own or control our company or people that our Company does not employ or manage.

This Privacy Policy applies to all information collected through our websites (such as www.rgaex.com), use of our services, sales activities, marketing or events (we refer to them collectively in this Privacy Policy as the “Services”).

Please read this Privacy Policy carefully as it will help you make informed decisions about sharing your personal information with us.

TYPE OF INFORMATION WE COLLECT

Personal information you disclose to us

We collect personal information that you provide to us such as name, Email address, phone number, and login data (username and password), personal data which may be contained in our communications (including your comments, feedback, product reviews and recommendations), payment details (including credit card information), and your personal profile.

We collect personal information that you voluntarily provide to us when registering to the Services, when you contact us through the Services, expressing an interest in obtaining information about us or our products and services, when we correspond with you as a customer or prospective customer, when participating in our activities or otherwise contacting us.

The personal information we collect can include the following:

1. **Name and Contact Data.** We collect your first and last name, email address, phone number, and other similar contact data.
2. **Credentials.** We collect passwords, password hints, and similar security information used for authentication and account access.
3. **Communications.** We collect personal data you may send us as part of our communications through the Services. This can be made by you approaching us via ‘contact’ forms in our website and your comments, feedback, product reviews and recommendations left by you as part of our Services.
4. **Payment Details.** We may collect certain information regarding your payments made through our Services, including credit card information.
5. **Personal Profile.** As described below.

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 automatically collected

Some information – such as IP address, computer and connection information and/or browser and device characteristics – is collected automatically when you visit our websites and/or use our Services.

We automatically collect certain information when you visit, use or navigate our Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies. You can find out more about this in our [Cookies Policy](#).

RGaEX Privacy Policy

USE OF YOUR INFORMATION

We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.

We use personal information collected via our Services for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests (the “Business Purposes”), in order to enter into or perform a contract with you (“Contractual”), with your consent (“Consent”), and/or for compliance with our legal obligations (“Legal Reasons”). We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- **To facilitate account creation and login process** with your Consent.
- **To provide our Users with ongoing customer assistance and technical support.**
- **To create aggregated statistical data** and other aggregated and/or inferred non-personal information, which we or our business partners may use to provide and improve our respective Services.
- **To send you marketing and promotional communications** for Business Purposes and/or with your Consent. We and/or our third-party marketing partners may use the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt-out of our marketing emails at any time (see the “Your Privacy Rights” below).
- **To send administrative information to you** for Business Purposes, Legal Reasons and/or possibly Contractual reasons. We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.
- **To post testimonials** with your Consent. We post testimonials on our Services that may contain personal information. Prior to posting a testimonial, we will obtain your consent to use your name and testimonial. If you wish to update, or delete your testimonial, please contact us at support@rgaex.com and be sure to include your name, testimonial location, and contact information.
- **Deliver targeted advertising to you** for our Business Purposes and/or with your Consent. We may use your information to send you business proposals tailored to your interests and/or location and to measure its effectiveness. For more information, see our [Cookie Policy](#).
- **To protect our Services** for Business Purposes and/or Legal Reasons. We may use your information as part of our efforts to keep our Services safe and secure (for example, for data breach monitoring and prevention).
- **To enforce our terms, conditions and policies** for Business Purposes, Legal Reasons and/or Contractual reasons.
- **To respond to legal requests and prevent harm** for Legal Reasons. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- **For other Business Purposes.** We may use your information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Services, products, services, marketing and your experience.

SHARING YOUR INFORMATION

We only share information with your consent, to comply with laws, to protect your rights, or to fulfill business obligations.

We only share and disclose your information in the following situations:

- **Compliance with Laws.** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests and Legal Rights.** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

RGaEX Privacy Policy

- **Vendors, Consultants and Other Third-Party Service Providers.** We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples may include: data analysis, email delivery, database management services, customer service and marketing efforts. We may allow selected third parties to use certain technologies on the Services, which will enable them to collect data about how you use the Services over time. This information may be used to, among other things, analyze and track data, determine the use of certain content and better understand online activity. *Unless described in this Privacy Policy, we do not share, sell, transfer, rent or trade any of your information with third parties for their promotional purposes.*
- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include our parent company and any subsidiaries or other companies that we control or that are under common control with us.

USE OF COOKIES AND OTHER TRACKING TECHNOLOGIES

We may use cookies and other tracking technologies to collect and store information.

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our [Cookie Policy](#).

INTERNATIONAL TRANSFER OF INFORMATION

We may transfer, store, and process your information in countries other than your own.

Our servers are located in all over the world, including Europe and the US. Please be aware that your information may be transferred to, stored, and processed by us in any other country in which our Company or agents or contractors maintain facilities, and by using our Services, you consent to any such transfer of information outside of your country.

RGaEX is committed to subjecting all personal information received from European Union (EU) member countries, in reliance on the Standard Contractual Clauses Framework's applicable Principles.

LENGTH OF KEEPING OF YOUR INFORMATION

We keep your information for as long as necessary to fulfill the purposes outlined in this Privacy Policy unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this Privacy Policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

KEEPING YOUR INFORMATION SAFE

We aim to protect your personal information through a system of organizational and technical security measures.

RGaEX is hosted on the Cloud Based Web Development Platform (CBWD Platform). The CBWD Platform provides us with the online platform that allows us to sell our products and services to you. Your data may be stored through the CBWD Platform data storage, databases and the general CBWD Platform applications. The CBWD Platform store your data on secure servers behind a firewall.

All direct payment gateways offered by the CBWD Platform and used by RGAeX adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of credit card information by our store and its service providers.

RGaEX Privacy Policy

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the services within a secure environment.

COLLECTING INFORMATION FROM MINORS

We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Site. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records.

YOUR PRIVACY RIGHTS

In some regions, such as the European Economic Area, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.

In some regions (like the European Economic Area), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please contact us support@rgaex.com. 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, 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.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with legal requirements.

Opting out of email marketing: You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list – however, we will still need to send you service-related emails that are necessary for the administration and use of your account. You can also opt-out by:

- Noting your preferences at the time you register your account with the Services.
- Logging into your account settings and updating your preferences.
- Contacting us using the contact information provided below

CALIFORNIA RESIDENTS SPECIFIC PRIVACY RIGHTS

If you are a resident of California, you are granted specific rights regarding access to your personal information.

RGaEX may also be subject to the CCPA, the California consumer privacy law enacted in 2018, which extends to individual Californian consumers various rights that align to a significant degree with the rights granted to most European residents under the GDPR with respect to their personal data/information. If you are a consumer based in California, the rights you have include:

(i) **Right to Disclosure:** right to request RGAeX to disclose to you: (a) the categories of personal information collected by us; (b) the categories of sources from which the personal information is collected; (c) the business or commercial purpose for collecting or selling personal information (*please be noted that we don't sell your personal information*); (d) the categories of third parties with whom we share personal information; (e) the specific pieces of personal information we have collected about you, the consumer — in all cases upon a verifiable consumer request (“VCR”).

If we receive a verifiable consumer request (VCR) to access personal information, we will promptly take steps to disclose and deliver, free of charge, the personal information required by law, which may be delivered by mail or electronically. If delivered electronically. We are not required to respond to your VCRs more than twice in a 12-

RGaEX Privacy Policy

month period. You can make a VCR either by completing our contact form on our website or sending such request to RGAeX's mailing address set forth at the end of this Privacy Policy.

(ii) **Right to Deletion:** We are required to disclose to you that you have the right to request that your personal information will be deleted. If a deletion VCR is received by us, we will delete your personal information from our records and direct any of our service providers to which we have provided such information to delete your personal information from their records. Notwithstanding the above, we are not required to comply with your VCR to delete personal information if we need to retain the personal information for the following purposes: (a) to complete the transaction for which personal information was collected, such as providing a product or Service requested you, or which is reasonably anticipated within the scope of our business relationship with you, or to perform a contract with you; (b) to detect security incidents, protect against malicious, deceptive, fraudulent or illegal activity, or prosecute those responsible for activity; (c) to debug to identify and repair errors that impair intended functionality; (d) to exercise our right to free speech or ensure the right of another consumer to exercise free speech or another right provided by law; (e) to comply with the California Electronic Communications Privacy Act; (f) to enable solely internal uses reasonably aligned with consumer expectations based on our business relationship with you; (g) to comply with a legal obligation; or (h) otherwise to use personal information internally in a lawful manner compatible with the context in which you provided the information.

(iii) **Non-Discrimination:** The CCPA requires that no subject business shall discriminate against you if you exercise your rights under this law, including by: (a) denying goods or services to you/the consumer; (b) charging different prices or rates for goods or services, whether through discounts, other benefits or imposing penalties; (c) providing a different level of goods or services, or suggesting that you will receive a different price, rate, level or quality of goods or services.

Our obligations to you under the CCPA will not prevent our ability to: (i) comply with federal, state or local laws; (ii) comply with civil, criminal or regulatory inquiry, investigation, subpoena or summons; (iii) cooperate with law enforcement agencies; (iv) exercise or defend legal claims; (v) use personal information that is deidentified or in the aggregate; (vi) collect personal information to extent every aspect takes place outside of California; (vii) avoid violation of an evidentiary privilege under California law, or provide personal information to a person covered by such a privilege.

UPDATES TO THIS POLICY

We will update this policy as necessary to stay compliant with relevant laws.

We may update this Privacy Policy from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this Privacy Policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this Privacy Policy frequently to be informed of how we are protecting your information.

CONTACT US ABOUT THIS POLICY

If you have questions or comments about this policy, email us at support@rgaex.com.