# **Privacy Policy**

As used in this Privacy Policy, "Service" refers to all websites, mobile sites, applications, and other properties or services owned or operated by Federer Industries, LLC ("us", "we", or "our")

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions.

#### **Personal Data**

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

- First name and last name
- Email address
- Cookies and Usage Data

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you.

You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send or by contacting us.

# **Usage Data**

We may also collect information that your browser sends whenever you visit our Service or when you access the Service by or through a mobile device ("Usage Data").

This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access the Service by or through a mobile device, this Usage Data may include information such as the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

# **Tracking & Cookies Data**

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

#### Examples of Cookies we use:

- Session Cookies: We use Session Cookies to operate our Service and various settings.
- Security Cookies: We use Security Cookies for security purposes.
- Preference Cookies: We use Preference Cookies to remember your preferences

#### **Use of Data**

We use the collected data for various purposes:

- To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information
- To detect, prevent and address technical issues
- To monitor the usage of our Service
- To gather analysis or valuable information so that we can improve our Service
- To provide customer support
- To allow you to participate in interactive features of our Service when you choose to do so
- To notify you about changes to our Service
- To provide and maintain our Service

# **Automatic Data Collection and Advertising**

We may work with analytics companies to help us understand how the Service is being used, such as the frequency and duration of usage. We work with advertisers and third party advertising networks, who need to know how you interact with advertising provided in the Service which helps us make the Service experience better. We may also share depersonalized versions of information from your application instances in order to enable our partners to append other publically available information about you for product analysis or advertising related use. List of 3rd party networks, which are used to promote our app (including, but not limited to):

- Facebook Ads (marketing partner);
- TikTok Ads (marketing partner);
- Google AdWords (marketing partner);
- Apple Search Ads (marketing partner);

Reddit Ads (marketing partner).

We may also work with third-party analytics softwares, which collect and use information from our app to analyse advertising and users behaviour inside our app.

## **Payments**

We may provide paid products and/or services within the Service. In that case, we use third-party services for payment processing (e.g., payment processors).

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy.

These payment processors 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 payment information.

The payment processors we work with are:

- Apple Store In-App Payments: Apple Store Privacy Policy
- Google Play In-App Payments: Google Play Privacy Policy

## **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 Data, we cannot guarantee its absolute security.

# Your Data Protection Rights Under General Data Protection Regulation (GDPR)

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. We aim to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

- The right to withdraw consent: You also have the right to withdraw your consent at any time.
- The right to data portability: You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.

- The right of restriction: You have the right to request that we restrict the processing of your personal information.
- The right to object: You have the right to object to our processing of your Personal Data.
- The right of rectification: You have the right to have your information rectified if that information is inaccurate or incomplete.
- The right to access, update or to delete the information we have on you: Whenever
  made possible, you can access, update or request deletion of your Personal Data
  directly within your account settings section. If you are unable to perform these actions
  yourself, please contact us to assist you.

Please note that we may ask you to verify your identity before responding to such requests. You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

## Children

Users under the age of 18 (a "Minor") shall have their legal guardian or parent agree to these Terms and our Privacy Policy on their behalf, and such legal guardian or parent shall be responsible for all actions taken under the account. We do not share any personal data or personally identifiable information received or collected from the service unless we have your consent, it is required by law, or we are required to do so in order to continue providing our service. Further, we do not knowingly collect or store sensitive data, or personally identifiable information from anyone under the age of 13. Pursuant to COPPA, we do not target or market our services to children below the age of 13. Persons under the age of 13 are not permitted to use the services.

When you create an account with us, you guarantee that you are above the age of 13, and that the information you provide us is accurate, complete, and current at all times. Inaccurate, incomplete, or obsolete information may result in the immediate termination of your account on the Service.

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 Children has provided us with Personal Data, please contact us at <a href="mailto:support@offhandlabs.com">support@offhandlabs.com</a>. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

# **Security**

We are concerned about safeguarding the confidentiality of your information. We provide physical, electronic, and procedural safeguards to protect information we process and maintain. For example, we limit access to this information to authorized employees and contractors who need to know that information in order to operate, develop or improve our Application. Please be aware that, although we endeavor provide reasonable security for information we process and maintain, no security system can prevent all potential security breaches. You understand and

acknowledge that the submission of any such information by you via the Internet or posting it on non-public (restricted or private) pages is at our own risk.

## **Changes to This Privacy Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

### **Contact Us**

If you have any questions regarding privacy while using the Service, or have questions about our practices, please contact us via email at <a href="mailto:support@offhandlabs.com">support@offhandlabs.com</a>.

Jan 28, 2023