

RetroAuth Privacy Policy

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The owner of this Site is Jordi Giménez Gámez (“RetroAuth”) with VAT number ES40532274H, located in Carrer Roger, 15, 2-1, 08028 Barcelona, Spain. To contact us, please email gimix@gimix.es.

Please read the following to learn more about our policies and procedures regarding the collection, use, and disclosure of information that we collect through RetroAuth website, and our products and services offered via a RetroAuth website, through RetroAuth software applications (“apps”), through RetroAuth social media pages and apps, through emails exchanged with us, through RetroAuth’s offline interactions with you, and through other means offered and controlled by RetroAuth (collectively, the “Services”).

By using RetroAuth Services and/or by providing Personal Information to RetroAuth, you agree to the processing of your personal data by RetroAuth in accordance with this Privacy Policy.

Personal Information

“Personal Information” is information about you that is personally identifiable, including your:

- Name
- Billing address
- Email address
- Usernames and passwords you create to use the RetroAuth Services
- Credit or debit card number you provide to our third-party service provider(s) via RetroAuth to process payments
- IP Address

If you submit any Personal Information relating to other people to us or to our service providers in connection with the services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

How We May Collect Personal Information

We and our service providers may collect Personal Information from you in a variety of ways.

- You may provide RetroAuth with your Personal Information when you create an account on any RetroAuth website, download marketing materials, download a software update, register for support, sign up for services or other product or service offerings from RetroAuth, register for a seminar, purchase software, participate in a survey, or solicit communication from RetroAuth.
- We may also receive your Personal Information from other online and offline sources, such as public databases, joint marketing partners, social media platforms, and other third parties.

You may refuse to supply us with certain Personal Information, with the understanding that this may

prevent you from engaging in certain activities or using certain products or services.

Website visitors: By accessing and using our website we collect, sometimes automatically and sometimes with your consent, the following information that we use to improve the website and services and to customize services to user's preferences and interests

- **Computer/Device Information.** Certain information is collected by most browsers or automatically through your device, such as computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version, and the name and version of the website, product, and/or service you are using. We use this information to ensure that our Services are functioning properly.
- **Cookies.** A cookie is a small data file sent to your browser from a web server and stored on your hard drive. Cookies allow RetroAuth to collect certain information about its website visitors, in order to remember their preferences, facilitate navigation, display information more effectively, understand usage, and for other purposes. You can access a list of cookies we use at the end of this document.
- **IP Addresses.** Your IP address is a number that is automatically assigned to the computer that you are using by your Internet Service Provider (ISP). The RetroAuth online services automatically identify, capture, and log IP addresses in our server log files whenever you use them, along with the time of your visit and the page(s) that you visited. RetroAuth uses IP addresses to analyze trends, administer the services, track user movement, ensure the security of your interaction, and gather broad demographic information for aggregate use.

License users: Additionally to the information collected from website visitors, when you purchase a license, you provide us the following personal data:

- Through the **license order** form we collect your name, e-mail, optionally password, full postal address, country and VAT number for the billing, and bank details for the payment. By submitting your payment details, you agree that these data are processed by the payment service providers, and not by RetroAuth. Also, you authorize RetroAuth to send instructions to the financial institution that issued your card to take recurring payments for your subscription.

How We May Use Personal Information. RetroAuth collects your Personal Information because it helps RetroAuth deliver the highest possible level of customer service to you. Following we indicate the legal bases and purposes of the processing:

- To respond to your inquiries and fulfill your requests, based on your consent.
- To provide you with our products or services, including software updates, based on contract performance.
- To allow you to sign up for an account so that you can, among other things, participate in our online communities or submit and track a support case, based on your consent.
- To send administrative information, for example, announcements regarding our products or services, and changes to our terms, conditions, and policies, based on our legitimate interests to inform about similar or related products or services contracted before and on a legal obligation to inform about changes to our policies.
- To complete and fulfill your purchase, for example, to communicate with you and provide you

with related customer service, based on contract performance.

- To send you marketing communications that we believe may be of interest to you, including product announcements, educational materials, special offers and upcoming online and offline events that RetroAuth believes you might like to be notified about, based on our legitimate interests to inform about similar or related products or services contracted before and on your consent that you may withdraw whenever.
- To personalize your experience by focusing on and presenting products and offers tailored to your interests, based on your consent.
- For our business purposes, such as performing data analysis and audits, developing new products, improving our services, identifying usage trends, and determining the effectiveness of our promotional campaigns, based on our legitimate interest.
- As we believe to be necessary or appropriate: (a) under applicable laws, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain, based on our legitimate interest and/or legal order.

If you do not want RetroAuth to keep you posted with the latest information on our products and services please inform us.

How We May Disclose Personal Information. RetroAuth may disclose your Personal Information:

- To our third-party service providers, vendors, and strategic partners who provide services such as data hosting, data analysis, order fulfillment, delivery of products or services, management and enhancement of user data, infrastructure provision, IT services, customer service, email delivery services, auditing services, and other similar services, to enable such third parties to provide the foregoing services.
- By you, on message boards, chat, profile pages, wikis and blogs, and other services within the Services to which you are able to post information and materials. Please note that any information you post or disclose through these services will become public information, and may be available to visitors to those services and to the general public. We urge you to be very careful when deciding to disclose your Personal Information, or any other information, on these services.
- To a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).
- As we believe to be necessary or appropriate: (a) under applicable laws, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

Protection of Personal Information. RetroAuth takes reasonable administrative, technical, and

physical measures to safeguard your Personal Information against loss, theft, unauthorized access, disclosure alteration misuse, or destruction. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us in accordance with the “Contact RetroAuth” section below.

Choices and Access. We give you choices regarding our use and disclosure of your Personal Information for marketing purposes. You may opt out from:

- **Receiving electronic communications from us.** If you no longer want to receive marketing-related emails from us on a going-forward basis, you may opt out of receiving them by clicking on the communication preferences link at the bottom of the email. We will try to comply with your request(s) as soon as reasonably practicable.

Please also note that if you opt out of receiving marketing-related messages from us, **we may still send you important administrative messages**, from which you cannot opt out.

RetroAuth informs data subjects about their **rights to access, rectification, erasure, restriction of processing, object, and data portability**. You may contact us in accordance with the “Contact RetroAuth” section below. In your request, please make clear what information you would like to have changed, whether you would like to have your Personal Information suppressed from our database or otherwise let us know what limitations you would like to put on our use of your Personal Information that you have provided to us. We will try to comply with your request as soon as reasonably practicable. You also have the right to lodge a complaint with a supervisory authority.

Retention Period. We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required, being at least the term of any service provision and 6 years thereafter (blocked), for tax, administrative, and legal purposes.

Use of Services by Consumers and Minors. The Services are not directed to consumers nor to individuals under the age of eighteen (18) or the age as allowed in your jurisdiction, and we request that these individuals do not provide Personal Information through the Services.

Sensitive Information. We ask that you do not send us, and you do not disclose, any sensitive Personal Information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, criminal background, or trade union membership) to us.

Links to Other Parties

The Services may link to other companies. This Privacy Policy does not address, and RetroAuth is not responsible for, the privacy, information, or other practices of any third parties, including any third party operating any sites and/or services to which the Services contain a link or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer. The inclusion of a link within the RetroAuth Services does not imply endorsement of the linked site or service by us or our affiliates. RetroAuth encourages you to review

the privacy policies and learn about the privacy practices of those companies whose websites you choose to visit.

This Privacy Policy does not extend to third-party software, even if packaged by RetroAuth or offered through a RetroAuth web property. While RetroAuth makes reasonable efforts to encourage app developers to follow privacy guidelines that meet or exceed what is described in this policy, we cannot and do not compel them to do so. When choosing to use apps, add-ons, or other third-party extensions, you are entering into a license agreement with those parties. You should familiarize yourself with the privacy policy of the organization or individual providing you with software that runs in or with your RetroAuth product.

Updates to This Privacy Policy

We may change this Privacy Policy from time to time. Please take a look at the “Last Modified” legend at the top of this page to see when this Privacy Policy was last revised. If we change our Privacy Policy, we will post an updated privacy policy on our website, and it will become effective as of the date of posting. Your use of the Services following these changes means that you accept the revised Privacy Policy.

Contact RetroAuth

If you have any questions or comments about this Privacy Policy, the practices of the Services or your dealings with RetroAuth, you can contact us at any time.

Please note that email communications are not always secure, so please do not include credit card information or sensitive information in your emails to us.