

# PRIVACY POLICY

(last updated 15.07.2020)

Your privacy is important to EZTitles Development Studio Ltd. and always has been. The EZTitles Development Studio Ltd. Privacy Policy describes the privacy practices of EZTitles Development Studio Ltd.'s apps and websites. Your relationship with EZTitles Development Studio Ltd. is governed by the laws of Bulgaria and is in compliance with the General Data Protection Regulation (GDPR) of the EU law.

If the content or information that you store on EZTitles Development Studio Ltd. apps or websites contains personal information of other individuals, you must be legally permitted to share the personal information with EZTitles Development Studio Ltd.

## Summary of Key Points:

- Where your consent is required, we will obtain your permission before (i) sending you news and promotional material about EZTitles Development Studio Ltd.; (ii) accessing information stored on your device relating to your use of, and engagement with, websites, apps and crash reports; and (iii) using automated systems to analyze your content. You can withdraw your consent to such activities at any time.
- This policy explains when we process personal information for our legitimate interests. You can ask us to stop processing this information.
- We use your personal information to enable you to register with EZTitles Development Studio Ltd. and to provide you with our websites and apps, and other products or services that you request.

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## What does this privacy policy cover?

This privacy policy describes how EZTitles Development Studio Ltd. (also referred to as "we," "us" or "our") will make use of your information in the context of:

- EZTitles Development Studio Ltd. websites and web-based aspects of the EZTitles Online License Manager and EZTitles Applications Manager (together referred to as "websites");
- Desktop apps that include a reference to this policy; and

- EZTitles Development Studio Ltd.'s marketing, sales, and advertising practices.

Please also see the [EZTitles Development Studio Ltd. Terms of Use](#) and any additional Terms of Use or [Product License Agreements](#) that may apply to the app or website you are using.

## How do we comply with General Data Protection Regulation (GDPR)?

The General Data Protection Regulation (GDPR) introduces rules for organizations that offer goods and services to people in the European Union (EU), or that collect and analyze data for EU residents no matter where you or your enterprise are located. This section gives you information on how we honor your rights and fulfill obligations under the GDPR when you're using EZTitles Development Studio Ltd. products and services.

Helpful definitions for GDPR terms used in this document:

- **Data Controller (Controller):** A legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. EZTitles Development Studio Ltd. is a Data Controller.
- **Personal data and data subject:** Any information relating to an identified or identifiable natural person (data subject); an identifiable natural person is one who can be identified, directly or indirectly.
- **Processor:** A natural or legal person, public authority, agency, or other body, which processes personal data on behalf of EZTitles Development Studio Ltd.
- **Customer Data:** Data produced and stored in the day-to-day interactions with EZTitles Development Studio Ltd. and our products and services.

The GDPR gives rights to people to manage personal data collected by EZTitles Development Studio Ltd. These rights can be exercised through a Data Subject Request (DSR). We provide timely information regarding DSRs and data breaches, and perform Data Protection Impact Assessments (DPIAs).

The following tasks are executed to meet GDPR standards:

- **Data subject requests (DSR).** A formal request by a data subject to a controller to take an action (change, restrict, access) regarding their personal data.
- **Breach notification.** Under GDPR, a personal data breach is 'a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored, or otherwise processed.'
- **Data protection impact assessment (DPIA).** Data controllers are required under GDPR to prepare a DPIA for data operations that are likely to result in a high risk to the rights and freedoms of natural persons.

### Data subject requests (DSR)

As a Data Controller EZTitles Development Studio Ltd. is able to:

- Give data subjects a copy of their personal data, together with an explanation of the categories of their data that are being processed, the purposes of that processing, and the categories of third parties to whom their data may be disclosed.
- Help every individual exercise their right to correct inaccurate personal data, erase data or restrict its processing, receive their data in a readable form, and where applicable, fulfill a request to transmit their data to another controller.

### Breach notification

The GDPR mandates notification requirements for data controllers and processors for a breach of personal data. As a Data Controller EZTitles Development Studio Ltd. are responsible for assessing risks to data privacy and determining whether a breach requires notification of a customer's DPA. We provide the information needed to make that assessment.

## What are our responsibilities as a Controller?

If a breach of personal data that is likely to result in a high risk to the rights and freedoms of individuals (such as discrimination, identity theft, fraud, financial loss, or damage to their reputation) occurs, the GDPR requires us to:

- Notify the appropriate Data Protection Authority (DPA) within 72 hours of EZTitles Development Studio Ltd. becoming aware of it. This notice to the DPA is required even where there is a risk to individuals that is not likely to result in a high risk.
- Notify the data subjects of the breach without undue delay.
- Document the breach including a description of the nature of the breach - such as how many people were impacted, the number of data records affected, the consequences of the breach, and any remedial action your organization is proposing or took.

### Data protection impact assessment (DPIA)

Under GDPR, data controllers are required to prepare a Data Protection Impact Assessment (DPIA) for processing operations that are likely to result in a high risk to the rights and freedoms of natural persons.

The GDPR mandates that a DPIA includes:

- Assessment of the necessity, and proportionality of data processing in relation to the DPIA's purpose.
- An assessment of the risks to the rights and freedoms of data subjects.
- Intended measures to address the risks, safeguards, security measures, and mechanisms to ensure the protection of personal data and demonstrate compliance with the GDPR.

The GDPR provides the following non-exhaustive list of cases in which DPIAs must be carried out:

- Automated processing for the purposes of profiling and similar activities that has legal effects or similarly significantly affects data subjects;
- Processing on a large scale of special categories of personal data – data revealing racial or ethnic origin, political opinion, and the like - or of data relating to criminal convictions and offenses;
- Systematic monitoring of a publicly accessible area on a large scale.

## What information does EZTitles Development Studio Ltd. collect about me?

### *EZTitles Development Studio Ltd. ID, registration, and customer support*

When you register to use an EZTitles Development Studio Ltd. app or website, or contact us for support or other offerings, EZTitles Development Studio Ltd. collects information that identifies you. This includes:

- Name;
- Company name;
- Email address;
- Telephone number and Address (used only for shipping purposes);
- Country;
- Payment/billing information (where an app or website is 'paid for');
- Content of customer support communications.

### *EZTitles Development Studio Ltd. apps and websites*

We collect information about how you use our apps and websites, including when you use a desktop app feature that takes you online (such as the EZTitles Applications Manager). This information is always anonymous and may not be associated directly with you. It includes:

- IP address;

- Type of browser and device;
- Webpage that led you to an EZTitles Development Studio Ltd. website;
- Search terms entered into a search engine which lead you to an EZTitles Development Studio Ltd. website;
- Use and navigation of websites and apps (collected by our service provider's servers when you are logged into the app or website);
- Analysis of your content (e.g., activity logs, and direct feedback from you) which is sent or received using an online feature of an EZTitles Development Studio Ltd. app or website, or which is stored on the EZTitles Development Studio Ltd. servers.

#### *EZTitles Development Studio Ltd. app activation and automatic updates*

When you activate your EZTitles Development Studio Ltd. app or when you install updates to the app, we collect information about the EZTitles Development Studio Ltd. app (version, date of activation, successful and unsuccessful updates).

#### *EZTitles Development Studio Ltd. online advertising*

EZTitles Development Studio Ltd. do not use personalized online advertising, including displaying EZTitles Development Studio Ltd. ads to you on other companies' websites and apps and on social media platforms, such as Facebook and LinkedIn. EZTitles Development Studio Ltd. websites do not use cookies and similar technologies provided by our own company or other companies to gather additional information to measure and improve the effectiveness of our advertising.

#### *Buttons, tools, and content from other companies*

EZTitles Development Studio Ltd. apps and websites may include buttons, tools, or content that link to other companies' services (for example, a Facebook "Like" button, YouTube channel link or PayPal). When you see or interact with these buttons, tools, or content, or view an EZTitles Development Studio Ltd. web page or app containing them, some information from your browser may automatically be sent to the other company. Please read that company's privacy policy for more information.

## **How does EZTitles Development Studio Ltd. use the information it collects about me, and what are the legal bases for these uses?**

EZTitles Development Studio Ltd. uses the information we collect about you for the following purposes:

- To fulfill a contract, or take steps linked to a contract: this is relevant where you register to use an EZTitles Development Studio Ltd. app or website (whether paid, or as a free trial). This includes:
  - Providing you with the EZTitles Development Studio Ltd. websites and apps for which you have registered, and any other services or products that you have requested;
  - Verifying your identity;
  - Taking payments;
  - Sending you necessary communications (for example, related to payments or expiration of your subscription); and
  - Providing customer service or support.
- As required by EZTitles Development Studio Ltd. to conduct our business and pursue our legitimate interests, in particular:
  - Providing you with the EZTitles Development Studio Ltd. websites and apps for which you have registered and any other products and services you have requested;
  - Analyzing your use and measuring effectiveness of our websites and apps to better understand how they are being used so we can improve them and engage and retain users;

- Using automated systems to analyze your content using techniques such as machine learning in order to improve our services and the user experience (where your consent is not required);
  - Diagnosing problems in our apps and websites;
  - Investigating and responding to any comments or complaints that you may send us; and
  - In connection with legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of information in connection with legal process or litigation).
- Where you give EZTitles Development Studio Ltd. your consent or otherwise consistent with your choices:
    - Accessing information stored on your device relating to your use of, and engagement with, websites and apps (e.g., EZTitles Online License Manager and EZTitles Applications manager) and crash reports;
    - Using automated systems to analyze your content using techniques such as machine learning in order to improve our services and the user experience (where your consent is required);

On other occasions where we ask you for consent, we will use the information for the purposes which we explain at that time.

- For legal reasons:
  - Responding to requests by government or law enforcement authorities conducting an investigation.
  - To detect, prevent, or otherwise address fraud, security or technical issues and software piracy (e.g., to confirm that software is genuine and properly licensed), helping to protect you as well as EZTitles Development Studio Ltd.

## **Does EZTitles Development Studio Ltd. share my personal information?**

### *Sharing with other Data Controllers*

We will share personal information with companies, organizations or individuals outside of EZTitles Development Studio Ltd. if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to detect, prevent, or otherwise address fraud, security or technical issues, as well as to protect against harm to the rights, property or safety of EZTitles Development Studio Ltd., our users, or the public as required or permitted by law.

### *Sharing with Data Processors*

We will also share your personal information with companies that help us to run our business by processing personal information on behalf of EZTitles Development Studio Ltd. for the purposes identified above. Such companies include providers of customer support services, payment processing services, fraud monitoring and prevention, email, and other logistics and service providers, and hosting services.

### *Other Information Sharing*

EZTitles Development Studio Ltd. may also share your personal information:

- When you agree to the sharing;
- When we are required to provide information in response to a subpoena, court order, or other applicable law or legal process;
- When we have a good faith belief that the disclosure is necessary to prevent or respond to fraud, defend our apps or websites against attacks, or protect the property and safety of EZTitles Development Studio Ltd., our customers and users, or the public;

- If we merge with or are acquired by another company, sell an EZTitles Development Studio Ltd. website, app, or business unit, or if all or a substantial portion of our assets are acquired by another company, your information will likely be disclosed to our advisers and any prospective purchaser's advisers and will be one of the assets that is transferred to the new owner.

We may share or publish aggregate information that doesn't specifically identify you, such as statistical information about visitors to our websites or statistical information about how customers use the EZTitles Development Studio Ltd. services.

## **Is my personal information secure?**

We understand that the security of your personal information is important. We provide reasonable administrative, technical, and physical security controls to protect your personal information. However, despite our efforts, no security controls are 100% effective and EZTitles Development Studio Ltd. cannot ensure or warrant the security of your personal information.

## **Where does EZTitles Development Studio Ltd. store my personal information?**

Your personal information and files are stored on EZTitles Development Studio Ltd.'s servers and the servers of companies we hire to provide services to us.

## **What rights do I have in respect of my personal information and how can I exercise these rights?**

Under the law of some countries, you may have the right to ask us for a copy of your personal information; to correct, delete or restrict (stop any active) processing of your personal information; and to obtain the personal information you provide to us for a contract or with your consent in a structured, machine readable format, and to ask us to share (port) this information to another controller.

In addition, you can object to the processing of your personal information in some circumstances (in particular, where we don't have to process the information to meet a contractual or other legal requirement, or where we are using the information for direct marketing).

These rights may be limited, for example, if fulfilling your request would reveal personal information about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping (such as fraud prevention purposes).

To exercise any of these rights (including deactivating your personal customer account), you can get in touch with us using the details set out below.

If you have unresolved concerns, you have the right to report them to an EU or other data protection authority where you live, work or where you believe a potential violation may have occurred.

To register with EZTitles Development Studio Ltd., to create a personal customer account, and to use some EZTitles Development Studio Ltd. websites, apps, products or services, the provision of some information is mandatory: if relevant information is not provided, then we will not be able to administer a personal customer account to you, or provide you with the websites, apps, products or services requested. All other provision of your information is optional. Providing optional information will help us offer you a better experience, such as more personalized or tailored content or offerings.

## **Withdrawing consent or otherwise objecting to how we process your data**

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your information for other purposes, such as those set out above. You have an absolute right to opt-out of a service or withdraw your consent, at any time by contacting us using the details provided at the end of this privacy policy.

## **How long does EZTitles Development Studio Ltd. retain my information?**

When you register for a personal customer account, we process and keep most personal information we have about you for as long as you are an active user of our products, services or apps. When you close your account, by contacting us using the details provided at the end of this privacy policy, after 30 days we begin deleting certain personal information that we no longer have a business reason to retain, such as your username, hashed password and your payment account data. However, we typically retain personal information related to our contract and business transactions with you for ten years after your last interaction with us.

Where we process personal information for marketing purposes or with your consent, we process the information until you ask us to stop and for a short period after this (to allow us to implement your requests). We also keep a permanent record of the fact that you have asked us not to send you direct marketing or to process your information so that we can respect your request in future.

## **Will this privacy policy change?**

Occasionally, we may change this privacy policy (or other documents in the EZTitles Development Studio Ltd. website or apps) to allow EZTitles Development Studio Ltd. to use or share your personal information in a different way. If we do, the links to the policy on our websites (which are generally found in the footer of the website) will indicate that the policy has been changed. For new users, the change will become effective upon posting. For existing users, if the change is significant, it will become effective 30 days after posting. We encourage you to periodically review the [EZTitles Development Studio Ltd. Privacy Policy](#) for the latest information on our privacy practices.

## **Who can I contact with questions or concerns?**

If you have a privacy question, concern, or request, please fill out the [Contact Form](#). You can also get in touch with EZTitles Development Studio Ltd.'s technical team at [support@eztitles.com](mailto:support@eztitles.com).