

Privacy Policy

Disclaimer

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Privacy is of utmost importance at ClicksDaily.io. We recognize the significance of protecting information which is stored on our servers or network or is intended to be stored on our servers or network and which relates to an individual. This Privacy Policy is designed to address regulatory requirements of the jurisdictions in which ClicksDaily.io offers its Services, including the General Data Protection Regulation (“GDPR”), as enacted by the European Commission and the California Consumer Privacy Act (“CCPA”). In this Privacy Policy, the terms “Service” and “Services” have the same meaning as described in the Terms and Conditions.

This Privacy Notice applies to all processing of Personal Data on the website ClicksDaily.io and all other ClicksDaily.io sites on which it appears (the “Sites”). If you do not agree with this Privacy Policy, in general, or any part of it, you should not use the Sites or Services. This Privacy Policy is periodically reviewed to ensure that any new obligations and changes to our business model are taken into consideration. We may amend this Privacy Policy at any time by posting an amended version on our website.

In this privacy policy, we will tell you:

- What Personal Data we collect from you and how we collect it;
- On what legal basis we collect your Personal Data;
- For what purpose we collect your Personal Data;
- How long we store it for;
- Who do we share your Personal Data with;
- Whether we intend to transfer it to another country;
- What are your rights with respect to your Personal Data; and
- Children’s Privacy; and
- Changes to this Privacy Policy.

1. What data do we collect about you and how do we collect it? We collect your Personal Data through a variety of methods: either you provide it to us directly, we collect it from external sources, or we collect it by using automated means.

Information you may provide to us: You may give us information about you by filling in forms on our Sites or through our app or by corresponding with us by phone, email or otherwise. This includes information you provide when you register to use the Services and when you report a problem with the Sites or with our app.

Information we collect about you: Regarding each of your visits to our Sites or our app we automatically collect the following information:

- **Login Information:** We log technical information about your use of the Services, including the type of browser and version you use, the last access time of your visit, the Internet Protocol (IP) address used to create your account and the most recent IP address used to access your account. **Device Information:** We collect information about the device you use to access your account, including the hardware model, operating system and version, and unique device identifiers, but this information is anonymized and not tied to any person.

Information We Collect Required by Law, Rule, or Regulation: Depending on the Service, we may collect information from you in order to meet regulatory obligations around know-your-customer (“KYC”) and the information that we collect from you includes the following: **External Sources:** We also receive information from other sources and combine that with the information we collect through our Services. For instance:

- We use “cookies” from time to time to help personalize your online experience with us. A cookie is a small text file that is stored on your computer to help us make your visit to our Sites more “user-friendly.” Please see our Cookie Policy for more details about the cookies we use. Cookies provide us with information about your use of the Sites that can help us improve the Sites and your experience with it. We will process Personal Data collected through cookies in accordance with this Privacy Policy. If you have set your browser to alert you before accepting cookies, you should receive an alert message with each cookie. You may refuse cookies by turning them off in your browser, however, you should be aware that our Sites, like most other popular sites, may not work well with cookies disabled.
- We use third-party services that may be co-branded as ClicksDaily.io but will do so with clear notice. Any third-party services may collect information as determined by their own privacy policies.
- Advertising or analytics providers may provide us with anonymized information about you, including but not limited to, how you found our website.

2. On what basis do we collect your data? We only use your Personal Data where we have a legal basis to do so: Consent. For some processing activities, we require your prior consent. This applies for example to some of our direct marketing activities which fall under the scope of the GDPR. You will always be prompted to take clear, affirmative action so that we can ensure that you agree with the processing of your Personal Data. This action may, for example, take the form of a checkbox. If you have given us your consent for processing operations, you may always change your mind, and withdraw your consent at any time and easily; all you need to do is to send us an email at the following address privacy@ClicksDaily.io

Legitimate interest. In most cases where we process Personal Data in the context of our Services, we rely on our legitimate interests in conducting our normal business as a legal basis for such processing. Our legitimate interests are to identify or prevent fraud, to enhance the security of our network and information systems, or to carry out processing operations for statistical purposes. We will use legitimate interest only when we have carried out an assessment on the impact that this processing may have on you and concluded that the processing does not unduly infringe your rights and freedoms. For example, we do not use this justification if we process sensitive data, or when the processing would be unexpected for you, or if we consider it to be too intrusive.

3. For what purposes do we collect your data? We collect your Personal Data to: Provide our Services (including customer support); Troubleshoot problems; Communicate with you about our Services and business and to inform you of matters that are important for your account and/or use of the Sites. We also use your Personal Data to respond to any questions, comments or requests you filed with us; Comply with applicable laws and regulations; Establish, exercise and defend legal claims; Monitor and report compliance issues; Customize, measure, and improve our business, the Services, and the content and layout of our – Sites and apps (including developing new products and services; managing our communications; determining the effectiveness of our sales, marketing and advertising; analyzing and enhancing our products, services, websites and apps; ensuring the security of our networks and information systems; performing accounting, auditing, invoicing, reconciliation and collection activities; and improving and maintaining the quality of our customer services); Perform data analysis; Deliver targeted marketing, service update notices, and promotional offers based on your communication preferences, and measure the effectiveness of it. To approach you via email for marketing purposes, we request your consent, unless it is not required by law. You always have the option to unsubscribe from our mailings, e.g., via the unsubscribe link in our newsletter; Perform risk management, including comparing information for accuracy and verify it with third parties and protect against, identify and prevent fraud and other prohibited or illegal activity, claims and other liabilities; and Enforce our contractual terms.

4. How long do we keep your data? We will only retain your personal information for as long as necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting obligations or to resolve disputes. While retention requirements vary by jurisdiction, information about our typical retention periods for different aspects of your personal information are described below.

- Contact Information such as your name, email address and telephone number for marketing purposes is retained on an ongoing basis until you unsubscribe. Thereafter we will add your details to our suppression list to ensure we do not inadvertently market to you.

- Content that you post on our Sites such as support desk comments, photographs, videos, blog posts, and other content may be kept after you close your account for audit and crime prevention purposes (e.g. to prevent a known fraudulent actor from opening a new account).
- Information collected via technical means such as cookies, web page counters and other analytics tools is kept for a period of up to one year from expiry of the cookie.

When Personal Data is no longer necessary for the purpose for which it was collected, we will remove any details that identifies you or we will securely destroy the records, where permissible. However, we may need to maintain records for a significant period of time (after you cease using a particular Service) as mandated by regulation.

5. Who do we share your personal data with? We may share your information with selected recipients to perform functions required to provide certain Services to you. All such third parties will be contractually bound to protect data in compliance with our Privacy Policy. The categories of recipients include:

- Other ClicksDaily.io entities, including to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about our products, services and communications;
- Service providers who help with our business operations and to deliver our Services, such as:
 - Cloud service providers providing cloud infrastructure;
 - Providers of ID verification solutions and other due diligence solutions (such as KYC and anti-money laundering);
 - Providers of website analytics;
 - Providers of customer service solutions; and
 - Providers of marketing automation platforms.
- Law enforcement, government officials, regulatory agencies, our banks, and other third parties pursuant to a subpoena, court order or other legal process or requirement if applicable to ClicksDaily.io; or when we believe, in our sole discretion, that the disclosure of data is necessary to report suspected illegal or fraudulent activity or to investigate violations of our Terms and Conditions. We also may share Personal Data with 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

ClicksDaily.io assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which Personal Data held by ClicksDaily.io is among the assets transferred.

6. Is your data transferred outside of the European Union? As we are located outside of the European Union, we will ensure that any entity, whether our processor or affiliate that transfers Personal Data to us from the EU employs appropriate safeguards. If your Personal Data is transferred to us from the European Economic Area by our service providers (i.e., Data Processors who are engaged on our behalf) and business partners, we will ensure that the transfer is lawful.

7. What are your rights? Under the GDPR and relevant implementation acts, individuals have statutory rights related to their Personal Data. Please note that rights are not absolute and may be subject to conditions.

One key right is the Right to object. You have the right to object to processing of your Personal Data where we are relying on legitimate interests as our legal basis (see above). Under certain circumstances, we may have compelling legitimate grounds that allow us to continue processing your Personal Data. Insofar as the processing of your Personal Data takes place for direct marketing purposes, including profiling for direct marketing, we will always honor your request.

Other rights are as follows:

- Right to withdraw consent. Insofar as our processing of your Personal Data is based on your consent (see above), you have the right to withdraw consent at any time.
- Right of access. You have the right to request access to your Personal Data.
- Right to rectification. You have the right to request rectification of the Personal Data that we hold about you.
- Right to erasure. You have the right to request erasure of your Personal Data. This enables you to ask us to delete or remove Personal Data in certain circumstances.
- Right to restriction. You have the right to request restriction of processing of your Personal Data.
- Right to data portability. In some cases, you have the right to request to transfer your Personal Data to you or to a third party of your choice.

The exercise of the aforementioned rights is free of charge and can be carried out by submitting an inquiry by contacting us at privacy@ClicksDaily.io

Before responding to your request, we will verify your identity and / or ask you to provide us with more information to respond to your request, if we have any doubts about your identity. We will do our best to respond to your request within one month, unless your request is particularly complex (for example if your request concerns a large amount of sensitive data). In such a case, we will inform you of the need to extend this response time by two additional months.

8. What about children's privacy? ClicksDaily.io does not address anyone under the age of 18. 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 child has provided us with Personal Data, please contact us at privacy@ClicksDaily.io. 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.

9. What happens if we make changes to this policy? We may update this policy to reflect changes to our information practices, but we will not reduce your rights under this Privacy Policy without your express consent. We will post any changes to this page and, if the changes are significant, we will provide a more prominent notice. We will also keep prior versions of this Privacy Policy in an archive for your review. We encourage you to periodically review our Privacy Policy for the latest information on our privacy practices and to contact us if you have any questions or concerns.

10. California Consumer Privacy Act Addendum. At ClicksDaily.io, we take our responsibilities under the California Consumer Privacy Act ("CCPA") seriously. If you are a California resident, the following provisions apply to our processing of information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household subject to the CCPA.

For such residents, the provisions of this CCPA Addendum prevail over any conflicting provisions in our ClicksDaily.io Privacy Notice.

1. California Personal Information We Collect . We have collected the following categories of California Personal Information within the last 12 months:

CATEGORY	EXAMPLES
Identifiers	E-mail address, unique personal identifier, online identifier, Internet Protocol address, country of residence, or other similar identifiers.
Information under the California Customer Records statute	“Personal Information” described in subdivision (e) of Section 1798.80 (California Customer Records statute). This means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, social security number, address, telephone number, passport number, driver’s license or state identification card number, bank account number, credit card number, debit card number, or any other financial information.
Commercial information	Commercial information, including records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies on our site

Internet or other similar network activity	Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer’s interaction with an Internet website, application, or advertisement
Geolocation data	Geolocation data
Inferences drawn from other personal information	Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes

For each of these categories, we obtain California Personal Information from a variety of sources. These sources include: yourself, with respect to both online and offline interactions you may have with us or our service providers; other entities with whom you transact; others with whom you maintain relationships who may deal with us on your behalf; the devices you use to access our websites, mobile applications, and online services; identity verification and fraud prevention services; marketing and analytics providers; public databases; social media platforms; and others consistent with this CCPA Addendum. For more information, please see the “For what purposes do we collect your data?” section of our Privacy Notice.

For each of these categories, we share Personal Information with a variety of third parties. These third parties include: other ClicksDaily.io entities; service providers; marketing and advertising providers; analytics providers; law enforcement, government

officials, or other third parties pursuant to a subpoena, court order, or other applicable legal process or requirement; and merchants in cases of suspected fraud or in connection with an ongoing investigation.

2. Sale and disclosure of California Personal Information. Within the last 12 months, within the meaning of “sale” under the California Consumer Privacy Act, we have disclosed California Personal Information identified in the above categories for business purposes. This includes the use of cookies on our website, including those placed by third parties. You can configure your browser to prevent the placement of cookies when using our site. To learn more about cookies, please see our Cookie Policy or your browser help documentation for more information. To learn more about the categories of third parties with whom we share such information, please see the “Who do we share your Personal Data with?” section of our Privacy Notice.

3. Use of California Personal Information. For each of the above categories, we use the California Personal Information we collect for the business purposes disclosed within this CCPA Addendum. Please note that the business purposes for which we may use your information include:

- Audits and reporting relating to particular transactions and interactions, including online interactions, you may have with us or others on our behalf;
- Detecting and protecting against security incidents, and malicious, deceptive, fraudulent or illegal activity, and prosecuting the same;
- Debugging to identify and repair errors in our systems;
- Short-term, transient use including contextual customization of ads or website;
- Providing services on our behalf or on behalf of another, including maintaining or servicing accounts, providing customer service, fulfilling transactions, verifying identity information, processing payments, and other services;
- Conducting internal research to develop and demonstrate technology; and
- Conducting activity to verify, enhance, and maintain the quality or safety of services or devices which we may own, control, or provide.

We may also use the information we collect for our own or our service providers' other operational purposes, purposes for which we provide you additional notice, or for purposes compatible with the context in which the California Personal Information was collected.

4. Your California Rights. If you are a California resident, you have certain rights related to your California Personal Information. You may exercise these rights free of charge except as otherwise permitted under applicable law. If you wish to submit a request under the CCPA, please do so by writing to privacy@ClicksDaily.io. As required under applicable law, we may take steps to verify your identity before granting you access to information or acting on your request to exercise your rights. We may require you to provide information to verify your identity in response to exercising requests of the above type, including name and account information. We may limit our response to your exercise of the below rights as permitted under applicable law.

4.1. Right to Access/Know . You have the right to request that we disclose to you:

- the categories of California Personal Information we have collected about you
- the categories of sources from which the California Personal Information is collected;
- our business or commercial purpose for collecting or selling California Personal Information;
- the categories of third parties with whom we share California Personal Information; and
- the specific pieces of information we have collected about you.

To the extent that we sell your California Personal Information within the meaning of the California Consumer Privacy Act or disclose such information for a business purpose, you may request that we disclose to you:

- the categories of California Personal Information that we have collected about you;

- the categories of California Personal Information about you that we have sold within the meaning of the California Consumer Privacy Act and the categories of third parties to whom the California Personal Information was sold, by category or categories of personal information for each third party to whom the California personal information was sold; and
- the categories of California Personal Information about you that we disclosed for a business purpose.

4.2. Right to Delete. You have the right to request that we delete California Personal Information about you which we have collected from you.

4.3. Right to Opt-Out and Right to Opt-In . You have the right to direct us to not sell your Personal Information at any time (the “right to opt-out”) by managing your cookie preferences by contacting us at privacy@ClicksDaily.io.

4.4. Non-Discrimination. Subject to applicable law, we may not discriminate against you because of your exercise of any of the above rights, or any other rights under the California Consumer Privacy Act, including by:

- Denying you goods or services;
- Charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
- Providing you a different level or quality of goods or services; or
- Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

5. Changes to this Notice . We may amend this Notice at any time by posting a revised version on our website. The revised version will be effective at the time we post it. You are responsible for periodically reviewing this Notice.

6. Contact Information . You may contact us with questions or concerns about our privacy policies or practices at privacy@ClicksDaily.io.