



Brico Browser Website Privacy Policy

Version 2.0
Effective Date: Sept 24th, 2022
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This privacy notice transparently communicates to our website visitor the personal data processing operations that take place when browsing our website www.bricobrowser.com and any other subdomain *.bricobrowser.com. Please read this privacy policy carefully to understand how we handle your personal data.

1. About Us

Ricta Technologies S.R.L. (hereinafter “we, “us” or similar) is a Romanian limited company, whose registered office is in Lujerului Street number 10, 6th District, Bucharest, Romania, PO BOX OP66GH1-CP02, registered with the Bucharest Trade Registry under number J40/2684/2020, tax code 42312660.

When you are using the Brico Browser application (hereinafter the “Product”) or access <https://www.bricobrowser.com> website (hereinafter the “Website”) and together are constituting “Brico Browser Platform”, we collect and process several categories of personal data from you as representative of our client (“Client” or “you”).

We are committed to protecting your privacy. This privacy notice sets out the types of personal information we collect, why and how we collect and process that information, what we do with it, who we share it with and certain rights and options that you have in this respect.

2. Personal data collected

2.1 What personal data we collect?

We treat any information relating to an identified or identifiable natural person as "personal data". This includes name, identification number, location data as well as online identifiers (e.g. IP address, cookie identifiers).

In order to provide our Services, we need to process your personal data. The categories of personal data we process depend on your use of the Services, including whether you opt to create an account or not.

In all cases, we collect only the minimum personal data necessary to achieve our purposes. Also, we do not knowingly collect or otherwise process sensitive data (e.g. personal data concerning your health, religious or political views etc.). If we realize that we have collected such personal data, we will delete it as soon as practically possible. If you believe that any of such personal data was provided to us, please contact us at “privacy@bricobrowser.support”.

We collect the content, communications, and other information you provide to us while using the Website and Services. For example, some pages on the Website allow you to send us emails, and such messages sent to us will contain your email address and any other additional information you wish to include.

If you choose to create an account on the Website, you will be asked to provide some information through a registration form, including your email address and password. Once registered on the Website, you may also add the additional personal data to your account: your first and last name, phone number, billing address, job title, organization etc.

You are responsible for providing us with accurate personal data and for keeping such data up to date. You may update your personal data by editing your user profile in your account.



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2.2 How we collect personal data?

Personal Data may be collected or accessed in various ways, including:

- directly from you (from your form input data on the Website);
- noticed by us when you navigate on our website (cookies, IP, website navigation, etc.);

2.2.1 Data provided by you directly

By accessing the website and providing personal data to us, you acknowledge you have read this privacy notice and, to the extent your consent is necessary and valid under applicable law, you consent to the processing of your personal data in accordance with this privacy notice.

When you visit our website, we process the following information about you:

(a) If you wish to contact us: Our Website gives you the ability to send us a message via the contact form. This includes fields such as name, email address and message. The data that you input in the contact form is processed based in our legitimate interest to respond to your inquiry and/or to keep a record of your request, feedback and the like.

(b) When you create an account: Creating an account implies providing data to the Website. These data are normally the following: your email address, a username, your first and last name and your country. In the profile section of your account, you can also fill in your phone number and other personal data. You will also be required to set up a password to ensure security of your account and billing details. Moreover, in the event of a purchase, you will have to provide all your personal data to the merchant of record.

(c) When you subscribe to our newsletter: We will process your data when you chose to subscribe to our newsletter by providing your e-mail address. The legal ground on which we base such processing is your consent, expressed by subscribing. We will make sure to provide you with a simple way to unsubscribe in any moment, either through the respective communication or by contacting us using the contact details at below. When you unsubscribe, you will stop receiving our newsletter. Your e-mail address will be shared with the e-mail solution provider.

(d) What happens if you don't give us your data: You can visit the website without filling in any personal data. However, where you wish to create an account or subscribe to our newsletter, you cannot do that without providing the minimum amount of information we need in order to deliver the service you are requesting, authenticate you and be able to contact you if needed.

2.2.2 Data collected through website

When you use the Website, we collect (directly or through 3rd parties) certain information automatically and stores it in log files, namely:

- **Location information.** When you connect to our Website, a third-party service takes care of the security of the site and therefore some location data could be collected, in particular on the country of origin of the connections;
- **Log data.** We automatically collect log information when you use the Website and you're logged in as the registered user. So, we collect a unique identifier of the host running the app, to bind it with the license. This unique identifier is anonymous but it does identify the host based on multiple hardware information;



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- **Transaction information.** We may collect limited information related to your transactions on the website, including the date and time and the amounts charged;
- **Cookies.** A cookie is a small file of letters and numbers that we put on your computer if you agree. For detailed information about the use of cookies, please refer to our Cookie Policy.

We use this information to help us design our site to better suit our users' needs.

This privacy notice does not apply to third-party services that you opt to access through our website. While accessing third-party services (example the payment gateway), please make sure that you carefully review the terms and conditions and privacy policies governing the use thereof.

3. Data processing details

We process the personal data collected from you for the purposes specified hereinafter or as stated at the point of collection (or as obvious from the context of collection). In particular, we process your personal data for any of the following purposes:

- **To administer and manage the Website.** We process your personal data to confirm and authenticate your identity, prevent unauthorized access to the restricted areas of the Website (e.g. access to the Subscription Plan limited to the Registered Users only). We also process your personal data to maintain the integrity of our Services by detecting and responding to harmful and any other conduct that violates our other policies.
- **To communicate with you.** We process your personal data to provide you with the information that you have requested, or that we think may be relevant to a subject in which you have demonstrated an interest as well as to reply to any other requests received from you;
- **To provide, personalize and improve our Services.** We process your personal data to provide and/or enable our subcontractors to provide the Services requested by you. We can also process your personal data to customize the contents and features of our Website, remember your settings and improve our service offerings. Your personal data can be additionally processed for internal administrative purposes and for accounting;
- **To manage our relationship with Services.** We may add your personal data to our customer management systems and provide you with regular updates related to our Services as well as changes that we introduce to our Terms of Use, Subscription Plan, Privacy Policy, Cookie Policy and any other documents from time to time;
- **To understand how you interact with our Website and Services and improve your experience.** We can process your personal data to understand how you use the features and functions on our Website, which content you access, and tailor our Website and Services to your needs and interests;
- **To send marketing communications.** To the extent permitted by the applicable law, we may process your personal data to send you the information about our Services which may be of interest to you and similar marketing information. We may also use the technologies that allow us to understand whether you opened a marketing email or clicked on a link contained therein.

We will disclose your personal data only for the purposes and to those third parties, as described below. We will take appropriate steps to ensure that your personal data are processed, secured, and transferred according to applicable law.



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We may need to engage third parties and, under certain circumstances, provide your personal data thereto for the purposes specified in this Privacy Policy:

3.1 Disclosure to third parties

We will share the strictly necessary parts of your personal data, on a need-to-know basis with the following categories of third parties:

(a) **Service providers.** We may need to share your personal data with the service providers (sub-contractors) that are engaged to provide the Services on our behalf, including the customer and service support, marketing, security and fraud prevention. Such third parties are authorized to process your personal data only to the extent permitted by us, and they are prohibited from using your personal data for other purposes;

(b) **Payment services.** We may access limited financial data related to your payments made according to the Subscription Plan. Most financial data, including your payment card details, is processed by one of the payment service providers, namely FastSpring used to manage and process your payments. Your financial data is provided directly to the payment service providers, and the use and storage thereof is governed by the privacy policies of such third parties. For more details, please refer to one of the following privacy policies depending on your payment method:

- FastSpring: <https://fastspring.com/privacy>

We do keep a copy of your transaction information for the reason to bind a specific license to your identity and your transactions.

We do use your email address as link between your transaction (license/product/services purchases) and our database containing licenses.

(c) **Marketing services.** In order to provide the information about our Services and any other information which may be of interest to you, we may use MailChimp, a third-party service that provides the tools to create, send, and manage emails. For more information, please refer to Section 3 of MailChimp (The Rocket Science Group LLC) Privacy Policy available at: <https://mailchimp.com/legal/privacy/>

(d) **Customer relationship management services.** We may use MailChimp, a user database management service provided by MailChimp (The Rocket Science Group LLC). Therein, we may process your personal data provided to us in accordance with this Privacy Policy. For more information, please refer to Section 3 of MailChimp (The Rocket Science Group LLC) Privacy Policy available at: <https://mailchimp.com/legal/privacy/>
We may use HelpSpace, a Customer Support service provided by HelpSpace GmbH

For more information, please refer to <https://legal.helpspace.com/privacy-policy>

(e) **Under certain circumstances, we are legally obliged to share your personal data.** For example, we may reveal your personal data to any law enforcement agency, court, regulator, government authority or other organization if we are required to do so to meet a legal or regulatory obligation, or otherwise to protect our rights or the rights of anyone else. In such cases, we will satisfy ourselves that we have a lawful basis on which we share the personal data with such authorities and other organizations.

We will disclose your personal information to third parties:

- (a) If you request or authorize so.
- (b) to persons demonstrating legal authority to act on your behalf.



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- (c) where it is in our legitimate interests to do so to run, grow and develop our business:
- (i) if we sell any business or assets related to the Website you are subscribing to, we may disclose your personal information to the prospective buyer of such business or assets, in order to ensure that the activity continues as a going concern.
 - (ii) if our company is totally or partially acquired by a third party, in which case personal information held by us will automatically be one of the transferred assets;
 - (d) if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, any lawful request from government officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity;
 - (e) to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or
 - (f) to protect the rights, property or safety of our company, our employees, customers, suppliers or other persons.

Some of these recipients (including our affiliates) may use your data in countries which are outside of the European Economic Area. Please see Section 4 below for more detail on this aspect.

While processing your personal data for any of the purposes specified herein, we ensure that we have a lawful basis that allows us to proceed with personal data processing. In every case, the lawful basis will be one of the following:

- **Our legitimate interests.** We rely on our legitimate interests where it is necessary to ensure the effective and lawful operation of our business (provided that our interests are not overridden by your interests and or fundamental rights and freedoms). For example, we rely on our legitimate interests when we provide our Services, understand how our Services and/or Website are used and which Services are of interest to you;
- **Performance of a contact with you or taking steps, at your request, prior to entering into the contract.** For example, where you opt to become a Registered User and/or purchase the Subscription Plan offered on the Website, we may need to process your personal data in order to provide you with the requested Services;
- **Consent.** Where required to obtain your consent, we will rely on your freely given, specific, informed, and unambiguous consent to the processing of your personal data. For example, we can process your personal data for marketing purposes subject to your consent. You can withdraw your consent at any time and, in the case of marketing emails, you can withdraw your consent by clicking the unsubscribe link added thereto;
- **Compliance with a legal obligation to which we are subject.** As per the legal requirements applicable to us, we may be obliged to collect and further store certain personal data about you. For example, we may be subject to the accounting requirements that would require us to store the information about our customers for a certain period of time.

3.2 Restrictions on use of personal information by recipients

Any third parties with whom we choose to share your personal information pursuant to the above are limited (by law and by contract) in their ability to use your personal information for the specific purposes identified by us. We will always ensure that any third parties with whom we choose to share your personal information are subject to privacy and security obligations



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consistent with this privacy notice and applicable laws. However, for the avoidance of doubt, this cannot be applicable where the disclosure is not our decision.

Save as expressly detailed above, we will never share, sell or rent any of your personal information to any third party without notifying you and, if applicable, obtaining your consent.

3.3 How and how long do we store your personal data?

In order to save to store customer data collected via the Website, we use the platform made available by FaunaDb, and we use a FaunaDB server instance hosted in Europe.

Your customer information's are stored inside FaunaDB platform. Such platform is managed by Fauna Inc. to offer our customer the maximum level of security for his data.

For more information, please refer to: <https://fauna.com/privacy>

We will retain your personal data only for as long as we need it, given the purposes for which it was collected, or as required to do so by law. Should you opt to become our Registered User or otherwise use the Services provided by us, we retain personal data about you for as long as you have an active account on the Website or as otherwise necessary to provide the Services. In some cases, we retain personal data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or as otherwise permitted or required by applicable law, rule, or regulation. For example, when you purchase a Subscription Plan on our Website, we will need to keep your personal data for accounting purposes for the period required by the applicable law. We keep mailing list information until you unsubscribe from our mailing lists as described herein and/or in the email that you receive. If you choose to unsubscribe from a mailing list, we may keep certain limited information about you so that we may honor your request and do not send you any marketing emails in future.

4. Transfers of information outside of the European Union

The personal information may be processed by staff operating outside the EEA working for us, other members of our group or third-party data processors for the purposes mentioned above.

While we act as a data controller in respect of your personal data, we may also transfer your personal data to and store it outside the country where you are located. This may be necessary to provide the Services set forth in our Terms of Use or for other purposes specified herein.

Such cross-border transfers may include the countries outside the European Economic Area ("EEA") and countries that do not have laws that would provide specific protection for personal data. Where we collect your personal data within the EEA, transfer outside the EEA will be only:

- to a recipient located in a country which provides an adequate level of protection for your personal data; and/or
- under an agreement which satisfies the European Union requirements for the transfer of personal data to data processors or data controllers outside the EEA, such as standard contractual clauses approved by the European Commission.

Further details on the steps we take to protect your personal information in these cases is available from us on request by contacting us (see section 8) at any time.



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5. Customer rights

As a data subject, you have specific legal rights relating to the personal data we collect from you. We will respect your individual rights and will deal with your concerns adequately.

(a) Right to withdraw consent: Where you have given consent for the processing of your personal data, you may withdraw your consent at any moment.

(b) Right to rectification: You may obtain from us rectification of personal data concerning you. We make reasonable efforts to keep personal data in our possession or control which are used on an ongoing basis, accurate, complete, current and relevant, based on the most recent information available to us. In certain situations (such as profile data in account module), we provide a self-service mechanism so that where users have the possibility to review and rectify their personal data.

(c) Right to restriction: You may obtain from us restriction of processing of your personal data, if:

(i) you contest the accuracy of your personal data, for the period we need to verify the accuracy,

(ii) the processing is unlawful, but you object to the erasure of the personal data, requesting instead the restriction of its use,

(iii) we do no longer need your personal data, but you request it for the establishment, exercise or defense of legal rights, or

(iv) you object to the processing while we verify whether our legitimate interests override yours.

(d) Right to access: You may ask us for information regarding personal data that we hold about you, including information as to which categories of data we have in our possession, what it is being used for, where we collected it if obtained indirectly, and to whom it is disclosed, if applicable. We will provide you with a copy of your personal data upon request.

(e) Right to portability: You have the right to receive your personal data that you have provided to us, and, where technically feasible, request that we transmit your personal data (that you have provided to us) to another organization.

You have these rights if, on a cumulative basis:

- we process your personal data by automated means, and the transmission is technically feasible;
- we base the processing of your personal data on your consent, or our processing of your personal data is necessary for the execution or performance of a contract to which you are a party;
- your personal data is provided to us by you; and
- the transmission of your personal data does not adversely affect the rights and the freedoms of other persons.

(f) Right to erasure: You have the right to request that we delete the personal data we process about you. We must comply with this request if we process your personal data, unless such data is necessary:

- for exercising the right of freedom of expression and information.



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- for compliance with a legal obligation that binds us.
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes; or
- for the establishment, exercise, or defense of legal rights.

(g) Right to object: You may object – at any time – to the processing of your personal data due to your particular situation, provided that the processing is not based on your consent but on our legitimate interests or those of a third party. In this event we shall no longer process your personal data, unless (i) we can demonstrate compelling legitimate grounds and an overriding interest for the processing or (ii) if the purpose is the establishment, exercise or defense of legal claims. If you object to the processing, please specify whether you also wish the erasure of your personal data, otherwise we will only restrict it.

You may always object to the processing of your personal data for direct marketing that was based on our legitimate interest, regardless of any reason. If the marketing was based on your consent, you can withdraw consent.

Other considerations:

- **Limited responsibility:** customer is solely responsible for the authenticity of the data provided. Brico Browser will not perform any check in this regard. Also no responsibility is taken towards the customer or third parties.
- **Time period:** We will try to fulfill your request within one month. Nevertheless, this period may be extended with up to three months due to reasons relating to the specific legal right or the complexity of your request. In all cases, if this period is extended, we will inform you about the term of extension and the reasons that led to it.
- **Restriction of access:** In certain situations, we may not be able to give you access to all or some of your personal data due to statutory restrictions. If we deny or limit your access, we will advise you of the reason for such measure.
- **No identification:** In some cases, we may not be able to look up your personal data due to the identifiers you provide in your request. In such cases, where we cannot identify you as a data subject, we are not able to comply with your request to execute your legal rights as described in this section, unless you provide additional information enabling your identification. We will inform you and give you the opportunity to provide such additional details.
- **Exercise of your rights:** In order to exercise your rights please contact us in writing or electronically at the contact addresses provided for in Section 8 below.

6. How do we protect your personal data?

We are committed to protecting personal information from loss, misuse, disclosure, alteration, unavailability, unauthorized access and destruction and takes all reasonable precautions to safeguard the confidentiality of personal information, including through use of appropriate organizational and technical measures. Organizational measures include physical access controls to our premises, staff training and locking physical files in filing cabinets. Technical measures include use of encryption, passwords for access to our systems and use of anti-virus software.

In the course of provision of your personal data to us, your personal information may be transferred over the internet. Although we make every effort to protect the personal information



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which you provide to us, the transmission of information over the internet is not completely secure. As such, we cannot guarantee the security of your personal information transmitted to us over the internet and that any such transmission is at your own risk. While we endeavor to protect our systems and services, we cannot guarantee the security of the personal data transmitted to or by us and we do not guarantee or warrant that the measures taken by us will prevent unauthorized access to personal data that we process.

7. Changes to our privacy notice

We reserve the right, at our discretion, to modify our privacy practices and update and make changes to this privacy notice at any time. For this reason, we encourage you to refer to this privacy notice on an ongoing basis. This privacy notice is current as of the date which appears at the top of the document. We will treat your personal data in a manner consistent with the privacy notice under which they were collected, unless we have your consent to treat them differently.

8. Contact information, requests, and complaints

Please direct your questions regarding the way we collect, use or store your personal data and any requests in the exercise of your legal rights to the following contact details: "privacy@bricobrowser.support"

We will investigate and use all reasonable efforts to resolve any request or complaint regarding the use or disclosure of your personal information.

If you are not satisfied with our reply, you may also make a complaint to the relevant data protection supervisory authority (in Romanian: National Supervisory Authority for Processing of Personal Data or ANSPDCP). You can find further information about the process of lodging complaints with ANSPDCP at https://www.dataprotection.ro/?page=procedura_plangerilor, and you can file a complaint using the form available at https://www.dataprotection.ro/?page=Plangeri_RGPD&lang=ro or by contacting ANSPDCP directly by email at anspdcpc@dataprotection.ro or by post at 28-30 G-ral. Gheorghe Magheru Blvd., Sector 1, postal code 010336, Bucharest, Romania.

In case the above contact is not reachable anymore please refer to: www.dataprotection.ro.