

# Privacy and Cookies Policy

**Last Updated:** February 2024

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## 1. OVERVIEW OF THIS POLICY

This document outlines:

the types of data we may collect about you our reasons and methods for processing that data occasions we might contact you using your data instances we might share your data with third parties your control over the personal data you provide to us.

## 2. SCOPE OF THIS POLICY

This policy applies to services offered by Virakle, including instances where our operations, functioning as distinct entities, link to this document or indicate its applicability. Exclusions to this policy include services that link to external companies' privacy and cookies policies, where Virakle's rules do not apply. This also extends to services branded by Virakle but operated by third parties; their privacy policies govern the use of your information in such cases.

### **3. PROTECTION OF YOUR PERSONAL DATA**

We prioritize the security of your and your family's personal data, designing our services with your safety in mind and employing dedicated personnel for data security and privacy. However, no system is infallible. If you suspect your Virakle account or personal data is compromised, please contact us immediately. Your data may be stored or processed outside the European Economic Area (EEA) by third-party service providers, under conditions that meet our security standards.

### **4. CATEGORIES OF PERSONAL DATA COLLECTED BY VIRAKLE**

Prior to collection, we will clarify the necessity for and use of your personal data, unless it is evident.

#### **a. Data Provided by You**

We may request your name, contact details, and other information, depending on the interaction. This might include data within content you share with us.

#### **b. Device Information**

We collect technical data from devices and browsers, even without a Virakle account login, which may include IP address, device IDs, and activity data.

#### **c. Data on External Activities**

Should you mention us on platforms like Twitter, we collect identifiable information such as your username. Account holders provide additional information like email and age, and we track service usage patterns.

### **5. RETENTION PERIOD FOR PERSONAL DATA**

We commit to only retaining your data for as long as necessary for the purposes stated at collection, considering the nature, sensitivity, and legal requirements of the data. Inactive accounts may be deleted after a year of disuse, with prior notification.

### **6. UTILIZATION OF YOUR PERSONAL DATA BY VIRAKLE**

We process your data with a lawful basis and, when applicable, seek your consent. Our use of your data includes service delivery, handling inquiries, license management, personalization, advertising, and innovation.

### **7. CIRCUMSTANCES UNDER WHICH VIRAKLE WILL CONTACT YOU**

We may contact you for updates, service changes, account inactivity, submissions, responses, surveys, and marketing, adhering to permissions granted.

## **8. CONTACT FOR MARKETING PURPOSES**

Marketing communications are sent based on consent. Your data may also influence targeted advertising on third-party platforms, with opt-out options available.

## **9. DISCLOSURE OF YOUR PERSONAL DATA**

Your data is not for sale. It may be shared with third parties for service provision, within Virakle's corporate family, for legal reasons, or in collaborative research, with strict controls and adherence to privacy laws.

## **10. PROVISIONS FOR MINORS**

Services suitable for minors include safeguards and transparent communication regarding data collection, use, and sharing, emphasizing consent and parental involvement.

## **11. DELETION OF YOUR DATA**

You may request the deletion of your account and associated data, subject to our data retention practices which include service usage records and contributions.

## **12. YOUR DATA PROTECTION RIGHTS**

You possess rights over your personal data, including access, correction, deletion, and objection to processing, subject to legal limitations.

## **13. USE OF COOKIES AND TRACKING TECHNOLOGIES**

Cookies and similar technologies facilitate service improvement, personalized experiences, and advertising. Consent governs the use of non-essential cookies, with settings adjustable at any time.

## **14. NOTIFICATIONS REGARDING POLICY UPDATES**

Significant changes to this policy will be communicated through various means, including emails and app messages. Disagreement with updates may lead to service discontinuation.

## **15. CONTACT INFORMATION FOR VIRAKLE**

For further information and to exercise your rights:

Email: [info@virakle.nl](mailto:info@virakle.nl)

Post: Virakle, Rembrandtlaan 70, 5461 GH Veghel, The Netherlands

