

# Douglass Community Privacy Policy

## Douglass Community Privacy Policy

This Privacy Policy describes how The Douglass Community collects, uses, shares, and safeguards personal information.

This Privacy Policy also tells you about your rights and choices with respect to your personal information, and how you can reach us to get answers to your questions. Nothing in this policy shall be construed to mean that any particular law applies to the data or processing described herein, including without limitation the California Consumer Privacy Act and the General Data Protection Regulation.

## We do not sell your data

We do not sell your personal data. Our business model is to provide you with a free edition and we charge you for extra services or features, according to the plan you choose. What you process within Rosa is yours and stays your.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions.

## Types of Data Collected

### **Personal Data**

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

- Email address

- First name and last name
- Cookies and Usage Data
- We may use your Personal Data to contact you with newsletters, marketing or promotional materials, and other information that may be of interest to you, if you have provided consent to this processing or if we can base this processing on a legitimate interest that is not overridden by your fundamental rights. You may in the future withdraw that consent or object to receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send or by contacting us

## **Account Data**

Rosa requires that you register for a personalized account. Account data may include in addition your account name, authentication information, registration date, contact information, payment information, and any other information associated with your account.

## **Usage Data**

We may also collect information that your browser sends whenever you visit our Service or when you access the Service, incl. by or through a mobile device (“Usage Data”).

This Usage Data may include information such as your computer’s Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access the Service by or through a mobile device, this Usage Data may include information such as the type of mobile device you use, the IP address of your mobile device, your mobile operating system, the app version, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

As a byproduct of the usage data within a Rosa Administrators may choose to share aggregated and therefore anonymous, non-personal data with us to help us learn more about how our product is being used.

## **Location Data**

We may use and store information about your location if you give us permission to do so (“Location Data”). We use this data to provide features of our Service (only to allow you to share your location to another user via Rosa, if it was enabled by the administrator).

You can enable or disable location services when you use our Service at any time, through your device settings.

## **Content you provide**

When you use our Services you may provide content into that service (e.g. upload file, send a message).

## Tracking & Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

We regularly monitor aggregated activity data on our infrastructure, but it is not tracking of individual users in the sense of this paragraph, which only occurs when we have a legitimate interest to do so (e.g. for security and compliance purposes). We do perform regular tracking on Rosa.

Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- Session Cookies. We use Session Cookies to operate our Service.
- Preference Cookies. We use Preference Cookies to remember your preferences and various settings.
- Security Cookies. We use Security Cookies for security purposes.

# How do we use information?

We collect and use your personal data to the extent necessary to carry out our operations and provide our services as well as to comply with any regulatory obligations in our activities.

These purposes are defined in more detail below:

- To provide and maintain our Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer support
- To gather analysis or valuable information so that we can improve our Service
- To monitor the usage of our Service
- To detect, prevent and address technical issues
- To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about if you have provided consent to receive this information or the processing is in our legitimate interests and it's not overridden by your rights.

# Legal Basis for Processing Personal Data

In accordance with the applicable regulations, we may only use your personal data for at least one of the following reasons:

## **To comply with legal and regulatory obligations**

We collect and use your personal data to comply various legal and regulatory obligations, such as:

- Anti-money laundering regulations and counter-financing of terrorism regulations, including Know Your Customer (KYC) obligations.
- Regulations relating to international financial sanctions and embargoes.

## **To fulfil our legitimate interest**

We also use your personal data to fulfill our legitimate interests, which include the following:

- Provision and delivery of our products and services.
- Marketing and customer communication and development of our customer relationships.
- Development of our products and services.
- Security and safety of our IT and facilities.

## **Based on your consent**

If processing of certain personal data requires your consent (e.g. cookies), we will inform you of this including details of the specific processing activity and request your consent to such processing. You may request to revoke your consent at any time.

# Retention of Data

Douglass P.B.C will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Douglass P.B.C will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer

time periods.

# Transfer of Data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside United States and choose to provide information to us, please note that we transfer the data, including Personal Data, to the United States or other jurisdictions deemed not not have an adequate level of data protection deemed by the competent authorities of your residence.

Douglass P.B.C. will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

# Disclosure of Data

## Business Transaction

If Douglass P.B.C. is involved in a merger, acquisition or asset sale, your Personal Data may be transferred. We will provide notice before your Personal Data is transferred and becomes subject to a different Privacy Policy.

## Disclosure for Law Enforcement

Under certain circumstances, Douglass P.B.C. may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

## Legal Requirements

Douglass P.B.C. may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Douglass P.B.C.
- To prevent or investigate possible wrongdoing in connection with the Service.
- To protect the personal safety of users of the Service or the public

# Your Rights

In accordance with applicable regulations and where applicable, you have the following rights:

- **To access:** you can obtain information relating to the processing of your personal data, and a copy of such personal data.
- **To rectify:** where you consider that your personal data are inaccurate or incomplete, you can request that such personal data be modified accordingly.
- **To erase:** you can require the deletion of your personal data, to the extent permitted by law.
- **To restrict:** you can request the restriction of the processing of your personal data.
- **To object:** you can object to the processing of your personal data, on grounds relating to your particular situation. You have the right to object to the processing of your personal data for direct marketing purposes, which includes profiling related to such direct marketing.
- **To withdraw your consent:** where you have given your consent for the processing of your personal data, you have the right to withdraw your consent at any time.
- **To data portability:** where legally applicable, you have the right to have the personal data you have provided to us be returned to you or, where technically feasible, transferred to a third party.

# Service Providers

We may employ third party companies and individuals to facilitate our Service (“Service Providers”), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

# Children’s Privacy

Our Service does not address anyone under the age of 18 (“Children”).

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. 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.

# Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the “effective date” at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

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