

Privacy Policy

Last Updated: 05/24/2021

This Privacy Policy has been compiled to provide users information about how MuukLabs INC (“MuukLabs,” “we,” “us” and “our”) handles their personally identifiable information when they visit MuukLabs’s website and other services operated by MuukLabs, and anywhere else this Privacy Policy is posted (“Site”). “Personally identifiable information” is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual, device, or household. Please read our Privacy Policy carefully for information about how we collect, use, protect or otherwise handle your personally identifiable information. If you have a question about how your personally identifiable information is being used, you can contact us through our contact details at the end of the Privacy Policy.

By visiting this Site, or providing your personally identifiable information to us, you are accepting the practices described in this Privacy Policy and Terms of Use . Please exit this Site immediately if you do not accept this Privacy Policy and Terms of Use, or are accessing the Site in a country or other territory where use of the Site is not permitted.

For a printable version of the Privacy Policy, please click [here](#).

WHAT PERSONALLY IDENTIFIABLE INFORMATION DO WE COLLECT?

The types of information we collect when you use the Site depend on the features you use on the Site. We will handle your personally identifiable information in accordance with this Privacy Policy and describe the information collected below:

- **Identifiers**, which may include name, address, Internet Protocol address, or email address. These are sourced directly from you or indirectly from you (e.g., from observing your actions on the Site). They are used to fulfill or meet the reason you provided the information, to contact you in relation to our Site, to respond to an inquiry, for product and service improvement, to screen for potential risk or fraud, or to process an order. For example, when you contact us, you may provide your first and last name, email address, telephone number, company, and other identifying information. We disclose this information for business purposes to internet service providers and administrative service providers.
- **Personal information categories contained in customer records**, which may include name, address, telephone number, bank account number, credit card number, debit card number, or any other payment and financial information. We source this information directly from you. We use this information to fulfill or meet the reason you provided the information, to contact you in relation to our Site, to respond to an inquiry, to screen for potential risk or fraud, to provide the products and services that you have ordered or requested, to provide customer service, or marketing. For example, we need

your payment information when you purchase products or services from us. We disclose this information for business purposes to internet service providers, administrative service providers, and payment processors.

- **Commercial information**, which may include records of services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. We source this information directly from you. We use this information to fulfill or meet the reason you provided the information, to contact you in relation to our Site, to screen for potential risk or fraud, and to respond to an inquiry or process an order. For example, we keep track of the services you have obtained. We disclose this information for business purposes to administrative service providers.
- **Professional or employment-related information**, such as your employer and company email. We source this information directly from you. We use this information to fulfill or meet the reason you provided the information. We disclose this information to administrative service providers.
- **Internet, technical or other similar network activity**, which may include usage and browsing history; device information, including device properties; search history; information on your interaction with our Site; and error logs. We source this information directly or indirectly from you (e.g., from observing your actions on our Site). We use this information to fulfill or meet the reason you provided the information, to screen for potential risk or fraud, or to improve our services and Site. We disclose this information for business purposes to administrative service providers, data analytics providers, and internet service providers. Please see our Cookie Policy for more information on our collection, use, and opt-out options.
- **Inferences drawn from other personally identifiable information**, which may include a profile reflecting a person's preferences, interests, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. We source this information directly or indirectly from you, (e.g., from observing your actions on our Site). We use this information to fulfill or meet the reason you provided the information. We do not disclose this information to third parties.

Your decision to provide any personally identifiable information is voluntary. However, please note that, if you do not provide certain personally identifiable information, we may not be able to accomplish some purposes outlined in this Privacy Policy and you may not be able to use or access certain services on our Site.

HOW DO WE COLLECT INFORMATION?

We collect information in the following ways:

- Directly from you when you enter information on our Site. For example, when you create an account, you provide your first name, last name, business email, and company.

- Indirectly from you when you visit our Site. For example, our Site collects information through cookies when you visit our Site. Please see our Cookie Policy for more information.

HOW DO WE USE YOUR INFORMATION?

We may use the information we collect from you when you register or use certain Site features in the following ways:

- To personalize user's experience and to allow us to deliver the type of content, services, and product offerings in which you are most interested.
- To provide our services.
- To improve our services and Site in order to better serve you.
- To allow us to better service you in responding to your customer service requests.
- To quickly process your transactions or respond to an inquiry.
- To send periodic emails or marketing materials regarding your products and services.
- For advertising and marketing purposes.
- To fulfill or meet the reason you provided the information.
- To notify you about changes to our service.

WHAT ARE THE LAWFUL BASES ON WHICH WE PROCESS YOUR PERSONALLY IDENTIFIABLE INFORMATION?

We collect and use personally identifiable information when we have a lawful basis to do so, as follows:

- At your direction and with your consent.
- To fulfill contracts we might have with you.
- For other legitimate business purposes.
- To comply with a legal obligation.

We will only use your personally identifiable information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If there is any change in the purposes for which we collect your personally identifiable information, we will inform you of such change. If you wish to obtain an explanation as to how the processing for the new purpose is compatible with the original purposes, please contact us through the Data Protection Officer, whose contact details are given at the end of this Privacy Policy. If we need to use your personally identifiable information for an unrelated purposes, we will notify you and will explain the legal basis which allows us to do so.

HOW DO WE PROTECT VISITOR INFORMATION?

The security of your information is very important to us and we will only collect personally identifiable information to the extent deemed reasonably necessary to serve you in view of our legitimate business purposes as set out above. Please understand, however, that no data transmissions over the Internet can be guaranteed to be 100% secure. Consequently, we cannot ensure or warrant the security of any information you transmit to us and you understand that any information that you transfer to us is done at your own risk. If we learn of a security systems breach we may attempt to notify you electronically so that you can take appropriate protective steps. By using the Site or providing information to us, you agree that we can communicate with you electronically regarding security, privacy and administrative issues relating to your use of the Site. We may post a notice via our Site if a security breach occurs. We may also send an email to you at the email address you have provided to us in these circumstances. Depending on where you live, you may have a legal right to receive notice of a security breach in writing.

DO WE USE 'COOKIES'?

Yes. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information. They are also used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better Site experiences and tools in the future. Please see our Cookie Policy, available [here](#), for more information.

SHARING WITH THIRD PARTIES

We are a service provider to our clients and process personally identifiable information on our clients' behalf. Outside of our role as a service provider, we do not transfer to outside parties your personally identifiable information unless we provide you with advance notice. This does not include our own service providers such as website hosting partners and other parties who assist us in operating our Site, conducting our business, or servicing you, so long as those parties agree to keep this information confidential. We may also release your information when we believe release is appropriate to comply with the law, enforce our Site policies, or protect ours or others' rights, property, or safety.

We may share or transfer your personally identifiable information in the course of any direct or indirect reorganization process including, but not limited to, mergers, acquisitions, divestitures, bankruptcies, and sales of all or a part of our assets. Your personally identifiable information may be shared following completion of such transaction and/or during the assessment process pending transfer. If transferred in such a case, your information would remain subject to this Privacy Policy or a policy that, at a minimum, protects your privacy to an equal degree as this Privacy Policy.

THIRD PARTY LINKS

Occasionally, at our discretion, we may include or offer third party products or services on our Site or provide links to other third party websites. These third party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. To better protect your privacy, we recommend that you review the privacy policy of any third party website you visit.

CONSENT TO TRANSFER

If you are visiting our Site from a location outside of the U.S., your connection may be through and to servers located in the U.S. Any information you provide during your visit will be processed and maintained on our server and other internal systems located within the U.S. The U.S. may not have the same data protection laws as the country you are visiting from and may not afford many of the rights conferred upon data subjects in your country. You acknowledge you understand that by providing your personally identifiable information to us, your personally identifiable information (i) will be used for the uses identified above in accordance with this Privacy Policy, and (ii) may be transferred to the U.S. as indicated above, in accordance with applicable law.

YOUR RIGHTS

Depending on your residence, the rights available to you may differ in some respects. We will respond to any rights request in accordance with local legal regulations. If you wish to make a request regarding any of the below rights, please contact us through the methods provided at the end of the Privacy Policy.

Right of access

- You may have the right to get confirmation about whether or not your personally identifiable information is being processed. If so, you have the right to access the personally identifiable information and other information, such as the purposes, the categories of personally identifiable information, the recipients (or categories of recipients) to whom the personally identifiable information have been or will be disclosed – our list of service providers who may receive your personally identifiable information can be found here, for particular recipients in third countries or international organizations, where possible, the predicted period that the personally identifiable information will be stored, or, if not possible, the criteria used to determine that period, your rights, etc.
- Where feasible and permitted by law, we will provide a copy of the personally identifiable information we are processing. For any further copies, we may charge a reasonable fee based on administrative costs. If you make the request by electronic means, and unless otherwise requested, the information shall be provided in electronic form.

Right to rectification

- You may have the right to rectify or complete your personally identifiable information if inaccurate or incomplete.

Right to erasure ('right to be forgotten')

- You may have the right to the erasure of your personally identifiable information in certain circumstances. For examples, see below.
 - Your personally identifiable information is no longer necessary for the purposes for which it was processed
 - You withdraw your consent on which the processing is based, and we have no other legal ground for the processing
 - You object to the processing and there are no overriding legitimate grounds for the processing
 - Your personally identifiable information has been unlawfully processed
 - Your personally identifiable information has to be erased for compliance with a legal obligation to which we are subject
- This right shall not apply to the extent that processing is necessary for the below purposes.
 - For exercising the right of freedom of expression and information
 - For compliance with a legal obligation which requires processing by a law to which we are subject
 - For the performance of a task carried out in the public interest
 - For the establishment, exercise or defense of our legal claims

Right to restriction of processing

- You may have the right to restrict the processing for the below reasons.
 - You contest the accuracy of your personally identifiable information, for a period enabling us to verify the accuracy of the personally identifiable information
 - The processing is unlawful and you oppose the erasure of the personally identifiable information and request the restriction of their use
 - We no longer need the personally identifiable information for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims
 - You exercised your right to object to processing pending the verification whether our legitimate grounds override yours

Right to data portability

- You may have the right to receive the personally identifiable information that you have given us, in a structured, commonly used and machine-readable format. You have the right to send that personally identifiable information to another controller, if the processing is based on consent pursuant or on a contract and is carried out by automated means.

Right to object

- **You may have the right to object, on grounds relating to your particular situation, to processing of your personally identifiable information which is based on our legitimate purposes. We will stop processing the personally identifiable information unless we have compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims. If personally identifiable information is processed for direct marketing purposes, including profiling, you may object at any time.**

Automated individual decision-making, including profiling

- You may have the right not to be subject to a decision based solely on automated processing, including profiling, except under certain exceptions under local law.

Right to withdraw consent

- Where the processing of personally identifiable information is based on your consent, you may have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before withdrawal.

Right to anonymity

- You may also have a right to request anonymity. This means that your personally identifiable information would not be collected or processed. If you choose to exercise this right, we may not be able to provide you with your requested goods or services.

Right to lodge a complaint with a supervisory authority

- You may have the right to lodge a complaint with a supervisory authority.

DATA RETENTION

We will retain your information for as long as needed to provide you services and to comply with our accounting and legal obligations, resolve disputes, and enforce our agreements.

YOUR CALIFORNIA RIGHTS

You may be entitled to the below rights:

- the **right to know**. You may request information about the categories and specific pieces of personally identifiable information we have collected about you, as well as the categories of sources from which such information is collected, the purpose for collecting such information, and the sale or disclosure for business purposes of your personally identifiable information to third parties, and the categories of third parties with whom this information was shared. You may also request a copy of the personally identifiable information we have collected, and upon request, we will provide this information to you in electronic form;

- the **right to opt out of the sale** of your personally identifiable information to third parties. We do not sell personally identifiable information, we do not share your personally identifiable information with third parties for their direct marketing purposes, and we do not sell the personally identifiable information of children under 16 years old;
- the **right to request deletion** of your personally identifiable information, subject to certain legal exceptions; and
- the **right to not be discriminated against** for exercising these rights. This includes the right not to be discriminated against for financial incentives. We may offer various financial incentives from time to time. The terms of the financial incentive will be provided at the time you sign up for the financial incentive. You may withdraw from any of the financial incentives. We have calculated the value of the financial incentive by using the expense related to the offer, and the value of your data is the value of the offer presented to you.

You can exercise your rights by contacting us using the details set out in the “Contact Us” section below. Whenever feasible for verification, we will match the identifying information provided by you to the personally identifiable information already maintained by us. If, however, we cannot verify your identity from the information already maintained by us, we may request additional information. You may designate an authorized agent to make a request on your behalf. Such authorized agent must have permission to submit requests on your behalf. We may deny a request from an agent that does not submit proof that they have been authorized by you to act on your behalf.

HOW DOES OUR SITE HANDLE DO NOT TRACK SIGNALS?

The “Do Not Track” (“DNT”) privacy preference is an option that may be made in some web browsers allowing you to opt-out of tracking by websites and online services. At this time, global standard DNT technology is not yet finalized and not all browsers support DNT. We therefore do not recognize DNT signals and do not respond to them.

CHILDREN

The Site is not intended for use by persons under the age of 16. We do not knowingly collect information from visitors under the age of 16 and, in the event that we learn that a person under the age of 16 has provided us with personally identifiable information, we will delete such personally identifiable information.

PRIVACY POLICY UPDATES

We may update this Privacy Policy from time to time. Whenever we make a change, we will post the updated policy at this Site and we encourage you to check our policy periodically. If we make a material change to this Privacy Policy, we will either continue to honor our prior policy for information that we collected when it was in force, or we will we will notify you by

prominently posting the changes on our Site or by using the contact information you have on file with us. By continuing to use our Site you are agreeing to be bound by any changes or revisions made to this Privacy Policy.

CONTACT US

If you have any questions regarding this Privacy Policy you may contact us using the information below:

ATTN: Renan Ugalde Amezcua

info@muuklabs.com