

OUR COMMITMENT TO YOU

Welcome to Svagon Privacy Policy ("Policy")

We, as Svagon, are very sensitive to the protection of the personal data you share with us. We appreciate that you trust us with your information and we intend to always keep that trust. With the "Policy" we have prepared for this purpose, we enlighten you about which data we collect, store, protect, and with whom we share it. We suggest you read this in conjunction with our [Terms and Conditions of Use](#)

When you're enjoying and navigating our mobile application or website, we collect some of your information to provide you with better service.

The app and website are accessible in many different countries. Also, Svagon Inc. is a "U.S.-based" company. By using our services, you are transmitting information to the United States. You must read this policy carefully due to explain how we protect your data when transferring it overseas.

Who We Are

"We" Svagon Inc. are serving you through the application and website on this path that we started. Therefore, we collect and process your data as a "data controller".

The responsible company's address is;

Svagon Inc.

19266 Coastal Hwy

Unit 4-1180

Rehobot Beach DE 19971

TYPES OF INFORMATION COLLECTED

1) Registration Information

The data collected at the time of creating an account are as follows:

- Name-Surname
- Email Address
- Mobile Number
- Gender Identity
- Date of Birth
- Location

The reasons for collecting this data are to verify users and prevent bots (robots) or fake accounts.

It is essential to supply your account details are kept up to date and accurate. For instance, if your phone number changes, please ensure that you update this in your account.

Also, after registering with Svagon, you can change some information in your profile or add new information. (like profile picture) However, you can not modify your date of birth and location. (because your location will automatically update itself if you allow access)

2) Usage Information

This means anonymous aggregate data that is automatically collected through your use of the Website. This includes information that identifies your device, your operating system, your IP address and the dates and times that you access and use the Website. (e.g., when you logged in, features you've been using, actions taken, the information shown to you, referring webpages addresses and ads that you interacted with) and your interactions with other members (e.g., members you connect and interact with, when you exchanged with them, the number of messages you send and receive).

3) Device information

We collect information from and about the device(s) you use to access our services, including hardware and software information such as IP address, device ID and type, apps settings and characteristics, app crashes, advertising IDs (which are randomly generated numbers that you can reset by going into your device' settings), identifiers associated with cookies or other technologies that may uniquely identify a device or browser.

Legal Basis of Data Processing

We as Svagon (which has the title of the data controller), only collect and process your data where we have a legal basis to do so. The legal basis for our collection and use of your data varies depending on the way and purpose of collecting it.

We will only collect personal data from you when:

- we have your consent to do so, or
- we need your data to perform a contract with you. For example, to provide you with our service to you, or
- pursuing our legitimate interests in a way that you might reasonably expect to be a part of running our business and that does not significantly impact your interests, rights and freedoms, for example, showing Svagon Inc. advertisements to you as you browse the internet.
- we have a legal obligation to collect or disclose personal data from you.

Reasons for Processing Data

- For ID verification purposes
- Set up a user account
- Provide, operate and maintain our services
- Process and complete transactions, and send related information, including transaction confirmations and invoices
- Manage our customers' use of our services, respond to enquiries and comments and provide customer service and support;
- Send customers technical alerts, updates, security notifications, and administrative communications
- Investigate and prevent fraudulent activities, unauthorised access to our services, and other illegal activities; and
- For any other purposes about which we notify customers and users.
- We use your Personal Information in this context based on the contract that we have in place with you or our legitimate interest for security purposes (e.g. the prevention and investigation of fraudulent activities). Personal Information will be deleted based on the terms of the contract.

Transferring and Sharing Your Data

We may share your data with trusted third parties to conduct our business, for example, to provide our Privacy Centre services to you; to handle feedback and complaints; and to help us understand your behaviour to customise and maximise our services, advertising, marketing, competitions and offers to you.

Our trusted categories of third parties include website hosts, ID verification providers, cloud service providers, social media providers, professional services providers, customer survey service providers and advertising partners.

As part of our e-marketing methods and based on our legitimate business interests, we use some Google services and some Facebook products by the practices explained in the Google and Facebook terms and privacy notices. To protect your data by pseudonymising it, Google and Facebook ensure that a hashing algorithm is applied automatically at the point of sharing personal data with Google and Facebook. Please consult their relevant terms and privacy notices for further information and your options. If we can help you in any way please do not hesitate to contact us at

As part of our fraud monitoring, detection and prevention methods and based on our legitimate business interests, we use a third-party fraud monitoring, detection and prevention service provider for all website/mobile app sales. As part of this service, we may share personal data that is required to make identity checks and personal data that we obtain from making identity checks (including data relating to your age, name and location), together with account information, with third-party organisations (including law enforcement agencies), involved in fraud prevention and detection and credit risk reduction. Please note that these third parties may retain a record of the information that we provide to them for this purpose.

We may share your data with government bodies and law enforcement.

We may also share your data with our professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.

Children (Minors)

While our website(s) and mobile app are designed for a general audience, we will not knowingly collect any data from children under the age of 18 or sell products to children.

Please do not attempt to sign up for our services, create an account or send any Personal Information about yourself to us. If we learn that we have collected Personal Information from a child under the age of 18, we will delete that information as quickly as possible. If you believe that a child under 18 may have provided us with Personal Information, please email Our privacy team will act upon this information as quickly as possible.

Marketing Preferences, Adverts

Marketing - Your Preferences

We may send you marketing communications and promotional offers:

- if you have created an account with us or subscribed to our services, and you have not opted out of receiving marketing (following your preferences, as explained below);
- by email, if you have signed up for email newsletters;
- We may use your data (as outlined in the 'Personal Data We Collect' section) to form a view of what we think you may like, or what may be of interest to you, and to send you details of services that may be relevant for you.
- We will ask you for your preferences about receiving marketing communications by email, and other communication channels.
- You will always have full control of your marketing preferences. If you do not wish to continue receiving marketing information from us (or any third party, if applicable) at any time:
- you can unsubscribe or 'opt-out' by using the unsubscribe button and following the link included in the footer of any marketing email; or
- account holders may withdraw their consent by simply logging in to the Svagon Inc. Privacy Centre and managing their preferences.

We will process all opt-out requests as soon as possible, but please note that due to the nature of our IT systems and servers it may take a few days for any opt-out request to be implemented.

Our Use of Analytics and Targeted Advertising

Tools

We use a range of analytics and targeted advertising tools to display relevant content on our website(s) or mobile app and online advertisements on other websites and apps to you. We use these tools to deliver relevant content to you in marketing communications (where applicable) and to measure the effectiveness of the advertising provided. For example, we use tools such as Google Analytics to target and improve our marketing campaigns, marketing strategies and

website(s) content. We may also use tools provided by other third parties to perform similar tasks. If you would like any further information about the data collected by these third parties or how the data is used, please contact us at

To opt out of targeted advertising, please manage your preferences in the Svagon Inc. Privacy Centre.

Links to Other Websites and Third Parties

Our website(s) may include links to and from the websites of our partner networks, advertisers and affiliates, or to social media platforms. If you follow a link to any of these websites, please note that these websites have their privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to their websites.

Storing, Securing and Retaining Your Data

Storing your data

We need to retain your data to satisfy our legal obligations, deal with complaints and queries, resolve, litigate or defend a dispute and prevent fraud and abuse.

Having obtained your consent (or another legal basis) to contact you, we will retain your data for marketing and analysis purposes until you withdraw your consent. If you choose to withdraw your consent to marketing, we will delete your data from our systems, unless we have another legal basis to retain it, which may include the performance of our contract with you.

Securing your data

The communication between your browser and our website(s) or mobile app uses a secure encrypted connection wherever your data is involved.

We have put in place physical, electronic and managerial security procedures for the storage and disclosure of your data to protect it against accidental loss, destruction or damage. Nevertheless, any data transmission over the internet or by any other means can never be fully secure, such is the character of the internet, and the provision of personal data by you to us is at your own risk. We take all reasonable measures to protect your data by putting appropriate technical and operational security measures in place.

When we disclose your data to trusted third parties (for the purposes set out in this notice), we require all third parties to have appropriate technical and operational security measures in place to protect your data, and we work with them to ensure that your data protection and privacy rights are respected. Where your data is shared with a third party, it must only be used for the purposes for which it was supplied.

In the unfortunate event of a personal data breach, we will notify you and any applicable regulator when we are legally required to do so.

Retaining your data

Your data will be deleted when it is no longer reasonably required for the provision of the Services described above or when you withdraw your consent (where applicable) and we are not legally required or otherwise permitted to continue storing such data.

The length of time we keep your data depends on what it is and whether we have an ongoing business need to retain it (for example, to provide you with a service you've requested or to comply with applicable legal or regulatory requirements).

We'll retain your data for as long as we have a relationship with you and for a period afterwards where we have an ongoing business need to retain it, by our data retention policies and practices. For example, where you ask to be unsubscribed from marketing communications, we may keep a record of your email address and the fact that you have unsubscribed to ensure that you are not sent any further emails in the future.

The California Consumer Privacy Act (CCPA)

The California Consumer Privacy Act ("CCPA") provides consumers with specific rights regarding their Personal Information. You have the right to request that businesses subject to the CCPA (which may include our Merchants with whom you have a relationship) disclose certain information to you about their collection and use of your Personal Information over the past 12 months. In addition, you have the right to ask such businesses to delete Personal Information collected from you, subject to certain exceptions. If the business sells Personal Information, you have a right to opt out of that sale. Finally, a business cannot discriminate against you for exercising a CCPA right.

When offering services to its Merchants, Svagon Inc. acts as a "service provider" under the CCPA and our receipt and collection of any consumer Personal Information is completed on behalf of our Merchants for us to provide the Service. Please direct any requests for access or deletion of your Personal Information under the CCPA to the Member with whom you have a direct relationship.

Consistent with California law, if you choose to exercise your applicable CCPA rights, we won't charge you different prices or provide you with a different quality of services. If we ever offer a financial incentive or product enhancement that is contingent upon you providing your Personal Information, we will not do so unless the benefits to you are reasonably related to the value of the Personal Information that you provide to us.

Changes to This Privacy Notice

From time to time we may change this privacy notice. If there are any significant changes we will post updates on our website(s) or mobile app, applications or let you know by email at

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How to Contact Us

We welcome feedback and are happy to answer any questions you may have about your data.
You can contact us at:

Email:

Address

Svagon Inc.

19266 Coastal Hwy

Unit 4-1180

Rehobot Beach DE 19971