

# Privacy Policy

## 1. Overview

RogueCG values your privacy. We have prepared this Privacy Policy to explain how we collect, use, protect, and disclose information and data when you use the RogueCG services ("Services") and products ("Products", "Software", "Plugins").

This Privacy Policy also explains your choices for managing your information preferences, including opting out of certain uses of your Personal Information (as defined below). The Policy applies to all RogueCG services and products. The Services, Products and Site are operated by RogueCG (hereinafter referred to as "RogueCG", "we", "us" and "our"). For the purposes of applicable European Union data protection legislation, we are the data controller.

## 2. What Personal Data Do We Collect?

We collect information pertaining to the purchase history and license activation of our products.

### Personal Data provided by you

- *Personal data about you upon purchase* - You will be asked to provide your email address to establish an Account. Information describing the purchase such as the name of the product, number of purchased license linked to your Account will be stored for the purpose of license activation.
- *Data about you upon software activation* - In order to link a license to your machine a unique and encrypted identifier is locally generated on your machine and stored in our servers according to your device characteristics.

We will provide you with a separate notice at the time of collection, if the use of that Personal Data differs from the uses disclosed in this Privacy Policy.

### Personal Data as you use our Products or Services

We don't collect information about you as you use the Product or Service, such as your IP address, browser type and version, operating system, referral source and device information.

We collect information about purchases you've made through Third party resellers, our Site or Services, such as product type, subscription type, date of purchase, etc.

### Personal Data about you from third-party sources

- *Personal Data from payment processors*: we will collect information about you from payment providers when you purchase products offered on Third party resellers, our Site or Service. Information varies per payment providers but might include: your email, name.

## **Other information we collect related to your use of our Products, Sites or Services**

We may collect additional information from or about you when you communicate with us, contact our customer support teams or respond to a survey.

### **3. Why Do We Retain Personal Data?**

We retain Personal Data in an identifiable format for the least amount of time necessary to fulfill our legal or regulatory obligations and for our business purposes (e.g. software license activation). We may retain Personal Data for longer periods than required by law if it is in our legitimate business interests and not prohibited by law. If your Account is closed, we may take steps to mask Personal Data and other information, but we reserve our ability to retain and access the data for so long as required to comply with applicable laws. We will continue to use and disclose such Personal data in accordance with this Privacy Policy.

### **4. How Do We Process Personal Data?**

We may Process your Personal Data for a variety of reasons that are justified under data protection laws in the European Economic Area (EEA) and France.

To operate the Sites and provide the Services, including to:

- initiate a payment
- authenticate your access to Product or Account.
- communicate with you about your Product, Account, the Sites, the Services, or RogueCG.

For our legitimate interests, including to:

- to manage risk and protect the Products, Sites, the Services and you from fraud by verifying your identity, and helping to detect and prevent fraud and abuse of the Products, Sites or Services.
- to comply with our obligations and to enforce the terms of our Products, Sites and Services, including to comply with all applicable laws and regulations.

With your consent, including to:

- to market to you by delivering marketing materials about RogueCG products.
- to respond to your requests, for example to contact you about a question you submitted to our customer service team.

You can withdraw your consent at any time and free of charge. Please refer to the section on “Your Privacy Choices” for more information on how to do that.

### **5. Do We Share Personal Data?**

We may share your Personal Data or other information about you with others in a variety of ways as described in this section of the Privacy Policy. We may share your Personal Data or other information for the following reasons:

- with payment providers in order to initialize a payment process - personal data necessary to facilitate the transaction;

We may share information about you with other parties for RogueCG's business purposes or as permitted or required by law, including:

- if we need to do so to comply with a law, legal process or regulations;
- to law enforcement authorities or other government officials, or other third parties pursuant to a subpoena, a court order or other legal process or requirement applicable to RogueCG;
- if we believe, in our sole discretion, that the disclosure of Personal Data is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity;
- to protect the vital interests of a person;
- to investigate violations of or enforce a user agreement or other legal terms applicable to any Service;
- to protect our property, Services and legal rights;
- to help assess and manage risk and prevent fraud against us, our Users and fraud involving our Products, Sites or use of our Services, including fraud that occurs at or involves our business partners, strategic ventures, or other individuals, and merchants;
- to companies that we plan to merge with or be acquired by;
- to facilitate a purchase or sale of all or part of RogueCG's business;

**We do not share your Personal Data with third parties for their marketing purposes.**

## **6. Selling data to third parties**

We do not, have not and do not have any future plans to sell your personal information to third parties.

## **7. Automated decision making and profiling**

We use the information about you and your usage of the service:

- to send you automated messages or notifications relevant to your user experience.
- to run usability and A/B tests to help us improve our service.

## **8. Do we process special categories of personal data?**

RogueCG does not process any personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of

uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

## **9. What Are Your Rights?**

In this section, we have summarized the rights that you have under data protection law. For a more detailed explanation of your rights, please refer to the relevant laws and guidance from the regulatory authorities.

### **The right to be informed**

RogueCG's Privacy Policy describes our practices in detail using simple language. Everything you need to know is here. If you have more questions, feel free to contact us at [support@roquecg.pro](mailto:support@roquecg.pro).

### **The right to rectification**

If you believe we have the wrong data about you, or that your data is incomplete, feel free to request changes at [support@roquecg.pro](mailto:support@roquecg.pro).

### **The right to erasure**

You can request anytime that your data and files are deleted from our servers without undue delay at [support@roquecg.pro](mailto:support@roquecg.pro). However, this may imply to waiver your rights to access our Services and Products since certain data are necessary for license and authentication.

### **The right to data portability**

Contact us at [support@roquecg.pro](mailto:support@roquecg.pro) to request a copy of the data we store about you. Once it is ready, you will receive the file via email.

### **The right of access**

Read our privacy policy for details about what data is processed by us. Contact us at [support@roquecg.pro](mailto:support@roquecg.pro) if you have further questions.

### **The right to object**

On top of the ability to opt out of processing by changing your settings, you can object to the processing of certain forms of data. Contact us at [support@roquecg.pro](mailto:support@roquecg.pro) if you have further questions.

**The right to appeal automated decisions and profiling** We may make an automated decision to block a user, in case we suspect this user is using our services or products for illegal acts or acts that violate our terms of use. If you believe that your account was unlawfully blocked, you can contact our support team.

### **The right against discrimination**

If you're a resident of California, United States, you have the right not to receive discriminatory treatment by us for the exercise of your privacy rights conferred by the California Consumer Privacy Act (CCPA).

**Note that filing multiple claims might be subject to a fee, not exceeding 10 GBP.**This does not apply for requests made under the Brazillian LGPD (Lei Geral de Proteção de Dados).

## **10. How Do We Protect Your Personal Data?**

We maintain technical, physical, and administrative security measures designed to provide reasonable protection for your Personal Data against loss, misuse, unauthorized access, disclosure, and alteration. While we are dedicated to securing our systems and Services, you are responsible for securing and maintaining the privacy of your password(s) and Account/profile registration information and verifying that the Personal Data we maintain about you is accurate and current.

In the unlikely event that a security breach which affects individuals' rights and freedoms is discovered, according to our risk assessment policy, RogueCG will inform those individuals without undue delay.

## **11. Can Children Use Our Services?**

The Site, Services and Products are intended for users who are 18 years old or older. We do not knowingly collect Personal Information from children under the age of 18. If we become aware that we have inadvertently received Personal Information from a child under the age of 18, we will delete such information from our records.

## **12. Updates or Changes in Processing**

If we wish to use your personal data for a new purpose, not covered by this Privacy Policy, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

We keep this Privacy Policy under regular review and we will place any updates on this document.

In other circumstances, if we decide to change this Privacy Policy, we will inform you by posting the revised Privacy Policy on the Site. Those changes will become effective on the revision date, shown in the revised Privacy Policy. Your continued use of our Site, Services or Products constitutes your consent to the revised Privacy Policy.

## **13. Contact Us**

You may contact us if you have general questions or concerns about this Privacy Policy and supplemental notices or the way in which we handle your Personal Data. Our Data Protection Officer can be contacted at [support@roguecg.pro](mailto:support@roguecg.pro)

## **14. Definitions**

**Personal Data** means information that can be associated with an identified or directly or indirectly identifiable natural person. "Personal Data" can include, but is not limited to, name, telephone number, email address, date of birth.

**Process** means any method or way that we handle Personal Data or sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, and consultation, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of Personal Data.

**Services** means any products, services, content, features, technologies, or functions, and all related websites, products and services offered to you by RogueCG.

**Sites** means the websites, mobile apps, official social media platforms, or other online properties through which RogueCG offers the Services and which has posted or linked to this Privacy Policy.

**User** means an individual who uses the Services or Products or accesses the Sites and has established a relationship with RogueCG (for example, by purchasing a plugin and agreeing to the RogueCG Terms of Service).

Revised: 02 October 2021