



WEBSITE PRIVACY POLICY

[Last Modified: January 20, 2025]

This Privacy Policy (“**Privacy Policy**”) governs the processing and transfer of personal data collected or processed by between Risco Ltd. (collectively with its subsidiaries and affiliated companies “**Company**”, “**we**”, “**us**” or “**our**”) when you access or use our website available <https://riscogroup.com/he/> (“**you**” or “**your**” and “**website**” or “**services**”). This Privacy Policy is an integral part of our website Terms of Use (“**Terms**”). Any capitalized terms not defined herein shall have the meanings ascribed to them in the Terms, or under the applicable privacy laws. In addition, any reference to the GDPR (as defined below) shall also include the UK Data Protection Act, 2018 (UK-GDPR).

This Privacy Policy explains what data we may collect from you, how such data may be used or shared with others, how we safeguard it and how you may exercise your rights related to your Personal Data (as defined below), as required under relevant privacy regulation, including where applicable the EU General Data Protection Regulation (“**GDPR**”), the Israeli Privacy Protection Law, 1981, the California Consumer Privacy Act (“**CCPA**”) and other US states as further detailed below.

Additional Notice to California Residents: In the event you are a California resident – please review our CCPA Notice to learn more about our privacy practices with respect to the CCPA.

Regional Notice to Specific US States Residents: In the event you are a resident of certain US States, some jurisdiction specific privacy laws may apply to you, as further elaborate under Section 13 below. Please review this section to learn more about our privacy practices and your rights under the privacy and data protection legislation which applies in these specific states.

If you have any questions regarding this Privacy Policy or our data practices, you are welcome to contact us at: Risco-dpo@riscogroup.com

You are not required by law to provide us with any Personal Data. However, please note that some of our Services and other website’s features require the processing of certain Personal Data and without such data we may not be able to provide you with all or part of such Services.

PLEASE NOTE THAT THE DISCLOSURE PROVIDED HEREIN PERTAINS TO THE PERSONAL DATA COLLECTED ON OUR WEBSITE AND DOES NOT COVER ANY OF OUR PRODUCTS. SUCH DATA IS GOVERNED BY SEPRATE DOCUMENTATION PROVIDED TO THE RELEVANT DATA SUBJECTS.



1. **POLICY AMENDMENTS:**

We reserve the right to amend this Policy from time to time, at our sole discretion. The most recent version of the Policy will always be posted on the website. The updated date of the Policy will be reflected in the “Last Modified” heading. Any amendments to the Policy will become effective immediately, unless we notify you otherwise. If we materially change the way in which we process your previously collected Personal Data, we will provide you with prior notice, or where legally required, request your consent prior to implementing such changes. **We strongly encourage you to review this Policy periodically to ensure that you understand our most updated privacy practices.**

2. **CONTACT INFORMATION AND DATA CONTROLLER INFORMATION:**

Risco Ltd. is the Data Controller (as such term is defined under the GDPR or equivalent privacy legislation) of your Personal Data collected from you as a visitor or user of our website.

You may contact us as follows:

- **By email:** Risco-dpo@riscogroup.com
- **By Mail:** 14 Hachoma Street, Rishon LeZion, 75655, Israel

Italian Branch:

- RISCO Group S.R.L
- Via Robecco. 91 20092 Cinisello Balsamo Milano

3. **DATA SETS WE COLLECT AND FOR WHAT PURPOSE:**

Below you can find information regarding the purposes for which we process your personal data as well as our lawful basis for processing, the definition of “personal” and “non-personal” data, and how it is technically processed.

Non-Personal Data

During your interaction with the Website and Services, we may collect aggregated, non-personal non-identifiable information (“**Non-Personal Data**”). We are not aware of the identity of the user from which the Non-Personal Data is collected. We collect Non-Personal Data regarding your use of the website, such as the scope, frequency, latency, pages accessed and viewed, time and date stamp, interactions with content and materials displayed through our website, language preference, and other technical information regarding the device used to access the website, for example type of device, type of browser, operating system, etc.

We may sometimes process and anonymize or aggregate Personal Data and identifiable information in a manner that shall create a new set of data that will be Non-Personal Data. Such a new data set can no longer be associated with any identified natural person. Non-Personal Data may be used by us without limitation and for any purpose.

If we combine Personal Data with Non-Personal Data, the combined information will be treated as Personal Data or for as long as it remains combined.



Personal Data

We may also collect from you, directly or indirectly, during your access or interaction with the website and Services, individually identifiable information, namely information that identifies an individual or may, with reasonable effort, be used to identify an individual (“**Personal Data**”). The types of Personal Data that we collect as well as the purpose for processing and the lawfulness are specified in the table below.

On our website, we do not knowingly collect or process any Personal Data constituting or revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning a person's health or data concerning a person's sex life or sexual orientation (“**Special Categories of Personal Data**”).

The table below details the processing of **Personal Data**, the purpose, lawful basis, and processing operations:

| DATA SET | PURPOSE AND OPERATIONS | LAWFUL BASIS PER GDPR |
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| <p>Contact Information: If you voluntarily contact us, e.g., through a “contact us” form in our website, you may be required to provide us with certain Personal Data such as your name, type of user, company name, email address, country of residents and any additional information you decide to share with us.</p> <p>** additional information which is not personal in nature, such as a description of company or business and other business-related data may be required.</p> | <p>We will use this data to respond to your inquiry.</p> <p>The correspondence with you may be processed and stored by us to improve our internal operations, as well as in the event we reasonably determine it is needed for future assistance or to handle any dispute you might have with us.</p> <p>We may retain and manage such information using external services and platforms such as CRM systems.</p> | <p>We process such Contact Information subject to our legitimate interest.</p> <p>If you are a customer of our Services, or partner approaching us regarding such Services we provide you with, the data will be processed per the contract between us.</p> |
| <p>Newsletter, Updates, and Event Registration: We may present you with the option to sign up to receive our newsletter or other promotional materials, or subscribe or sign up to our events, and you will be requested to provide your contact details, such as email address.</p> | <p>We will use the information you provide to include you in our mailing list and send you the materials you have signed up to receive.</p> <p>If you have provided us with your phone number, we may also use that phone number for SMS delivery, always in accordance with applicable law while providing with the ability to opt-out where required under such law.</p> | <p>Our lawful basis for the processing of this data is your consent.</p> <p>You may withdraw your consent at any time by clicking the “unsubscribe” link which will be included in the email we will send you. You may also contact us through the above means of contact and request to unsubscribe.</p> |
| <p>Online Identifiers and Advertising and Targeting data: When you interact with the website and Services, we may collect online identifiers such as your Internet</p> | <p>Collection of device identifiers is needed for the following purposes:</p> <p>(i) Internal statistics and analysis, for which device identifiers might be</p> | <p>Our lawful basis for processing this data for technical and security</p> |



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| <p>Protocol address (IP), Cookie-ID, etc., and other information that relates to your activity through the website, such as pages viewed, click stream data, login time and date stamp, etc. This data might be collected directly by us or through our use of third parties' cookies and advertisement platforms.</p> <p>Similarly, we may collect Ad calls, which is a code shared with advertisers, include zip code, advertiser ID, the webpage the end user came from, the IP address, approximate location which assists the advertiser to determine which ads to place. The ad call will also include the end user's preference regarding interest-based advertisement as further explained herein.</p> | <p>combined with usage data, for example, to analyze how many visitors have accessed certain content and from which country (where the country is extracted from the IP address) in order to enhance and improve our website and its content.</p> <p>(iii) Marketing and advertising purposes. Our partners will process this data to manage and deliver advertisements and content more effectively and personally, including contextual, behavioral, and interests-based advertising based on your activity, preferences or other data available to us or to our business partners and advertisers, including for re-targeting purposes.</p> | <p>purposes is based upon our legitimate interests.</p> <p>If we process your Personal Data for analytics and advertising purposes and to the extent required under applicable laws (e.g., if we use third party cookies), we will obtain your consent for such processing. In any such case, you may withdraw consent or change your preferences at any time by using the cookie settings tool available on our website.</p> |
| <p><u>Joining us as a Partner:</u></p> <p>The website allows you to send an initial application to join as our Partner. The application form will usually include some basic contact and identification information, such as your Name, Email, Phone, Business' Type Company, Date of Birth, etc.</p> <p>Provided your progress within the registration process we may collect additional data from you, as requested through our forms or by any of our representatives.</p> | <p>We will use that information to contact you and checking your application.</p> <p>We may manage such data within our systems such as CRM or ERP, including through the use of external vendors and online systems.</p> | <p>Where we process such data for the commencement of an actual partnership with you, such data is processed for the fulfillment of a contract between us.</p> <p>Further record keeping of applications data is done under our legitimate interest.</p> |
| <p><u>User's Login Information:</u></p> <p>The website allows our customers, partners, installers and other third parties, to access their account within our systems and services. For accessing your account, you will be required to provide us with your credentials, such as your username and password.</p> | <p>We will process your credentials for verifying your identity and granting you access to the requested system or service.</p> <p>As part of that we may use your email or phone number as part of a Multi-Factor-Authorization process.</p> <p>We may also process your login information by using "cookies".</p> | <p>Our lawful basis for processing such data and granting you access to the requested service is the contract between us.</p> <p>We may further analyze and process your login data for security purposes, upon our legitimate interests.</p> |



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| *** the Terms of the actual use of any product or system is governed by such product's or system's specific agreements. | | |
| Recruitment Data: in the event you apply for a job via our website, we will collect your contact details such as full name, email address, phone number, CVs and any additional information you choose to provide us. | To process your job application and for recruitment purposes. | We will process such Recruitment Data subject to our legitimate interests to consider your application and respond. If we move forward with you in the recruitment process, at an advanced stage of the negotiations we will process your data as part of our contractual relationship with you. If we choose to retain your data for any future optional positions that may apply to you, we will ask for your explicit consent. |

Please note that the actual **processing operation** per each purpose of use and lawful basis detailed in the table above may differ. Such processing operation usually includes a set of operations made by automated means, such as collection, storage, use, disclosure by transmission, erasure, or destruction. The transfer of Personal Data to third-party countries, as further detailed in the Data Transfer Section below, is based on the same lawful basis as stipulated in the table above.

In addition, we may use certain Personal Data to prevent potentially prohibited or illegal activities, fraud, misappropriation, infringements, identity thefts, and any other misuse of the website and to enforce the Terms, as well as to protect the security or integrity of our databases and the website, and to take precautions against legal liability. Such processing is based on our legitimate interests.

4. **HOW WE COLLECT YOUR INFORMATION:**

Depending on the nature of your interaction with us, we may collect the above detailed information from you, as follows:

- **Automatically** – we may use cookies (as elaborated in the section below) or similar tracking technologies (such as pixels, tags, agent, etc.) to gather some information automatically.
- **Provided by you or about you voluntarily** – we will collect information if and when you choose to provide us with the information, such as contact us form, job application form or become a partner application form, etc.



- **Provided from third parties** – where permitted under applicable law and provided with your consent for cookie usage, we may enrich the Personal Data collected about you with data provided by third parties.

5. COOKIES

When you access or use the website, we use “cookies” or similar tracking technologies, which store certain information on your device (i.e., locally stored). The use of cookies is a standard industry-wide practice. A “cookie” is a small piece of information that a website assigns and stores on your computer while you are viewing a website. Cookies are used by us for various purposes, including allowing you to navigate between pages efficiently, as well as for statistical purposes, analytic purposes and advertising. You can find more information about our use of cookies here: www.allaboutcookies.org.

There are several types of cookies, including without limitation:

- **Essential, Functionality, Operation & Security Cookies.** *These cookies are essential for enabling visitor movement around the website, for the website to function properly, and for security purposes (i.e., used to authenticate visitors, prevent fraudulent use, and protect visitor data from unauthorized parties). This category of cookies either cannot be disabled, or if disabled, certain features of the website may not work.*
- **Analytic, Measurement & Performance Cookies.** *These cookies are used to collect information about how visitors use our website, in order to improve our website, content, and the way we offer them, as well as assess performance of the content and marketing campaigns. These cookies enable us, for example, to assess the number of visitors who have viewed a certain page as well as their country of origin. It enables our website to remember information that changes the way it behaves or looks, such as your preferred language.*
- **Preference, Targeting & Advertising Cookies.** *These cookies are used to advertise across the internet and to display relevant ads tailored to visitors based on the parts of the website they have visited (e.g., the cookie will indicate you have visited a certain webpage and will show you ads relating to that webpage).*

You may find more information about the cookies we use as well as opt-out of cookies or change your preferences at any time by using the cookies setting tool available on the footer of our website.

Where we use third-party advertising cookies, such third-party may independently collect, through the use of such tracking technologies, some or all types of Personal Data detailed above, as well as additional data sets, including to combine such information with other information they have independently collected relating to your online activities across their network of websites, for the purpose of enhanced targeting functionality and delivering personalized ads, as well as providing aggregated analytics related to the performance of our advertising campaign you interacted with. These third parties collect and use this information under their own privacy policies, and we are not responsible for their privacy practices.

6. DATA SHARING:

We share your data with third parties, including our partners or service providers that help us operate and make the most of the website. You can find here information about the categories of such third-party recipients.



| Categories of Recipients | Additional Information |
|--------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Our Affiliated Companies | We may share Personal Data with our affiliated companies and subsidiaries in order to provide joint services, for example, marketing, improving our services, etc. |
| Our Distributors, Installers and partners | We may sometimes transfer and share your information with relevant third-parties which assist us with providing you with services. That may include distributors, installers and other local parties which may engage you directly to allow you the purchase of our services. |
| Our Service Providers | <p>We share your Personal Data with our trusted service providers and business partners that perform business operations for us on our behalf (as data processors) and pursuant to our instructions.</p> <p>This includes the following categories of service providers:</p> <ul style="list-style-type: none"> ● Advertising and marketing service providers, who help us with advertising measurements, email marketing, etc.; ● Data storage providers, with whom we entrust the hosting and storage of our data; ● Consent Manager (CMP), an external service that provides us with the ability to allow website visitors to control and manage their cookies preferences and consent; ● General IT and SaaS providers – providing us with IT systems for the management of our daily conduct; ● Data analytics and data management providers, who help us improve, personalize and enhance our operation. ● Data security partners, who help us detect and prevent potentially illegal acts, violations of our policies, fraud and/or data security breaches and ensure compliance with legal obligations. |
| Legal and Law Enforcement | We may disclose certain Personal Data to law enforcement, governmental agencies, or authorized third parties, in response to a verified request relating to criminal investigations or alleged illegal activity or any other activity that may expose us, you, or any other visitor to legal liability, and solely to the extent necessary to comply with such purpose. |
| Corporate Transactions | <p>In the event of a corporate transaction (e.g., sale of a substantial part of our business, merger, consolidation, or asset sale) we will share the Personal Data we store with our acquiring company.</p> <p>In any such case, we will oblige the acquiring company to assume the rights and obligations as described in our Privacy Policy.</p> |

When we share information with service providers, we ensure they only have access to such information that is strictly necessary for us to operate the website. These parties are required to secure the data they receive and to use the data for pre-agreed purposes only while ensuring compliance with



all applicable data protection regulations (however, such service providers may use certain data for their own benefit subject to separate terms agreed upon with you or per your consent, as well as in the case of using merely Non-Personal Data).

7. DATA RETENTION:

In general, we retain the Personal Data we collect for as long as it remains necessary for the purposes set forth above, all under the applicable regulation, or until you express your preference to optout, where applicable.

The circumstances in which we will retain your Personal Information include: (i) where we are required to do so in accordance with legal requirements, or (ii) for us to have an accurate record of your interaction with us in the event of any inquiries or contact requests, or (iii) if we reasonably believe there is a prospect of litigation relating to your Personal Data. Please note that except as required by applicable law, we will not be obligated to retain your data for a particular period, and we may delete it for any reason and at any time, without providing you with prior notice of our intention to do so.

8. SECURITY MEASURES:

We take great care in implementing physical, technical, and administrative security measures for the website and Services, that we believe comply with applicable regulation and industry standards to prevent your information from being accessed without the proper authorization, improperly used or disclosed, unlawfully destructed, or accidentally lost.

If you feel that your privacy was not dealt with properly or was dealt with in a way that was in breach of our Privacy Policy or if you become aware of a third party's attempt to gain unauthorized access to any of your Personal Data, please contact us at our email.

9. INTERNATIONAL DATA TRANSFER:

Due to our global business operation, we may store or process your Personal Data in several territories, including, for example in Israel, the UK, EU, US or in other countries (whether directly or indirectly through the use of our vendors). Thus, your Personal Data may be transferred to and processed in countries other than the country from which you accessed our websites or otherwise the country of your jurisdiction. We will take appropriate measures to ensure that your Personal Data receives an adequate level of data protection upon its transfer in accordance with applicable law.

Further, when Personal Data collected within the EU is transferred outside the EU (and not to a recipient in a country that the European Commission has decided provides adequate protection) it shall be transferred under the provisions of the [standard contractual clauses](#) approved by the European Union. If you would like to understand more about these arrangements and your rights in connection therewith, please contact us at our email.

In addition, some of the third parties used for cookies management on our website may store and process data globally, including in the US (e.g., Google Analytics servers). When granting consent for such cookies through the cookies tool on the website, you hereby acknowledge and approve such cross-border transfer, in accordance with such third party's privacy practices.



10. YOUR RIGHTS

Data protection and privacy laws may grant you certain rights with regards to your Personal Data, all according to your jurisdiction. The rights may include one or all of the following: (i) request to amend your Personal Data we store accessing; (ii) review and access your Personal Data that we hold; (iii) request to delete your Personal Data that we hold (as long as we do not have a legitimate reason for retaining the data); (iv) restrict or object to the process your Personal Data; (v) exercise your right of data portability (vi) contact to a supervisory authority in your jurisdiction and file a complaint; and (vii) withdraw your consent (to the extent applicable).

If you wish to submit a request to exercise your rights, please fill out the Data Subject Request Form (“DSR”) available [here](#) and send it to our email at: Risco-dpo@riscogroup.com .

When you contact us and request to exercise your rights regarding your Personal Data, we will require certain information from you in order to verify your identity and locate your data and that the process of locating and deleting the data may take reasonable time and effort, as required or permitted under applicable law. Data privacy and related laws in your jurisdiction may provide you with different or additional rights related to the data we collect from you, which may also apply.

You have the right to lodge a complaint with the EU Member State supervisory authority if you are not satisfied with the way in which we handled the complaint.

For additional rights under various jurisdictions, including US state laws, please refer to the specific regional disclosure below.

11. THIRD PARTY WEBSITES:

Our Privacy Policy only addresses the use and disclosure of Personal Data we collect from you. To the extent that you disclose your Personal Data to other parties via the website (e.g., by clicking on a link to any other website or location), different rules may apply to their use or disclosure of the Personal Data you disclose to them, and this Privacy Policy does not apply to any such third-party products and services. You agree that we shall have no liability whatsoever with respect to such third-party sites and your usage of them.

12. ELIGIBILITY AND CHILDREN PRIVACY:

Our Services is not directed nor is it intended for use by children, and we do not knowingly process a children's information. We will discard any information that we receive from a user who is considered a "child" immediately upon our discovery that such a user shared information with us. Please contact us at: Risco-dpo@riscogroup.com, if you have reason to believe that a child has shared any information with us.

13. Regional US Privacy Notice:

General Applicability and Jurisdictions

This section applies to residents of specific US States under applicable specific state laws, including without limitation residents of Virginia, Connecticut, Colorado, Utah, Texas, Oregon, Montana, and effective of January 1, 2025 – Nebraska, New Hampshire, New Jersey, Delaware, and Iowa, as amended or superseded from time to time and including any implementing regulations and amendments thereto



(collectively, “US Privacy Laws”). Any term not defined herein under this section shall have the meaning ascribed to such term in the Privacy Policy above or applicable US Privacy Laws.

California residents, please refer to our **CCPA Notice**, which discloses the categories of personal information collected, purpose of processing, source, categories of recipients with whom the personal information is shared for a business purpose, whether the personal information is sold or shared, the retention period, and how to exercise your rights as a California resident.

The specific disclosure in this section supplements our general Privacy Policy as detailed above and provides additional details to the extent we are deemed as a “Business” or “Controller” under applicable US Privacy Laws - for example where we process visitor’s information regarding their use of the Website.

The Personal Information We Process

Under the “**DATA SETS WE COLLECT AND FOR WHAT PURPOSE**” section above you can find details regarding the categories of Personal Data that are collected and processed, and the purposes for which such Personal Data is processed, stored or used. We will not collect additional categories of Personal Data or use the Personal Data we collected for a materially different, unrelated, or incompatible purpose without obtaining your consent. As further set forth above, collected Personal Data may include, depending on your interaction with us as a visitor or customer:

- **Contact Communications Information** – including your identifiers and contact information (name, email, phone, etc.), the content of your inquiry, and additional information as provided voluntarily by you, such as your workplace and position, country of residence, etc. – collected and processed to respond to your inquiry and to keep a record of our interaction with you.
- **Online Identifiers and Advertising and Targeting data** – your IP address, location and time zone setting, operating system and platform, browser plug-in types, domain name and your choice of browser, approximate location (derives from IP address), etc. – processed as part of our technical website management and operation, analytics and online marketing activity.
- **Analytics Data** – we may process certain information on an aggregated, statistical and de-identified manner for measuring the usage of our Services. We do so to allow ourselves improve and further develop our Services.
- **Newsletter** – to the extent we will offer you to subscribe to our newsletter – such as your email, phone number, and your interaction with the messages and content we will send you – collected and processed for sending you news and updates regarding our Services per your consent and subject to applicable law.
- **Partners’ Information** – information provided by you for the purpose of becoming a prospect partner as an installer, an integrator, etc., which shall be processed for such purposes by us.

Under US Privacy Laws, Personal Data does not include publicly available information and information that cannot be reasonably linked to you, directly or indirectly, such as de-identified or aggregated data, and information governed by other state or federal laws, such as: Health or medical information



covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA), Personal Data covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) and the Driver's Privacy Protection Act of 1994, Children's Online Policy Protection Act of 1998 (COPPA), Family Educational Rights and Privacy Act of 1974, National Security Exchange Act of 1934, higher education data and employment data, etc.

"Sensitive Data" under US Privacy Laws is generally defined as data revealing racial or ethnic origin, religious beliefs, mental or physical health history, condition or diagnosis, sex life or sexual orientation, citizenship or immigration status, genetic or biometric data that can be processed/is processed to uniquely identify an individual, precise geolocation or personal data from a known child. As a "Business" or "Controller" (i.e. the legal owner of personal data), we do not collect or process or use any of your Sensitive Data.

Disclosures of your Personal Data to Third Parties, and Sale or Share of Personal Data

Under the "data sharing" section above, you will find details regarding the categories of third parties we share Personal Data with for business purposes.

We do not sell your personal information for profit. However, we do engage in targeted advertising on the website. Some of those marketing activities, when conducted through the use of third parties, may be considered a "Sale" or "Share" under certain US Privacy Laws. In this context, as is common practice among companies that operate online, we permit third party advertising networks, social media companies and other third-party businesses to collect information directly from your browser or device through cookies or similar tracking technology when you visit or interact with the website, for example, for collection of Online Identifiers and Advertising and Targeting data as detailed above. These third parties use this personal information to deliver targeted advertising (also known as "cross-context behavioral advertising") and personalized content to you on our website, on other sites and services you may use, and across other devices you may use, as well as to provide advertising-related services such as reporting, attribution, analytics, and market research. To learn more about this please read the Cookies section above. Depending on your state of residency and subject to certain legal limitations and exceptions, you may be able to limit or opt-out of the sale of personal information or the processing of personal information for purposes of targeted advertising through the use of the Cookie Toolbar on the website's footer or as detailed under the "Exercising Your Rights Section" below. Please note that even if you opt-out you may still see personalized ads based on information other companies and ad networks have collected about you, if you have not opted out of sharing with them.

For IBA opt out options on desktop and mobile websites, please visit:

- Digital Advertising Alliance (US) <https://www.aboutads.info/choices/>
- Digital Advertising Alliance (Canada) <https://youradchoices.ca/en/tools>
- Digital Advertising Alliance (EU) <https://www.youronlinechoices.com/>
- Network Advertising Initiative <https://optout.networkadvertising.org/?c=1>



We do not knowingly sell or share personal information of individuals younger than 16 years of age. Similarly, as a “Business” or “Controller”, we do not collect or process, therefore not Sell or Share, any Sensitive Data.

Exercising Your Privacy Rights

Under US Privacy Laws, the following rights may apply to you:

| The Right | Details and Limitations |
|-------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Right to Access/ Right to Know | You have the right to get information regarding the processing of your personal information by us. |
| Right to Correction | You have the right to correct inaccuracies in your Personal Data, taking into account the nature and purposes of processing of such Personal Data. |
| Right to Deletion | <p>You have the right to delete Personal Data, this right is not absolute and in certain circumstances we may deny such request. We may deny your deletion request, in full or in part, if retaining the information is necessary for us or our service provider(s) for any of the following reasons: (1) Complete the transaction for which we collected the Personal Data, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you; (2) Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities; (3) Debug products to identify and repair errors that impair existing intended functionality; (4) Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law; (5) Comply with the law or legal obligation; (6) Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information’s deletion may likely render impossible or seriously impair the research’s achievement, if you previously provided informed consent; (7) Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us; (8) Make other internal and lawful uses of that information that are compatible with the context in which you provided it.</p> <p>We will delete or de-identify personal information not subject to one of these exceptions from our records and will direct our processors to take similar action.</p> |
| Right to Portability | You have the right to obtain the Personal Data in a portable, and to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance. |



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| Right to opt out from selling Personal Data | You have the right to opt out of the sale of your Personal Data for the purposes of targeted advertising, sale to a third party for monetary gain, or for profiling in furtherance of decisions that produce legal or similarly significant effects concerning you or any other consumer. You may authorize another person acting on your behalf to opt out, including by broad technical tools, such as DAA, NAI, etc. as detailed above. |
| Right to opt out from Targeted Advertising | |
| Right to opt out from Profiling | |
| Duty not to violate the existing laws against discrimination or non-discrimination | Such discrimination may include denying a good or service, providing a different level or quality of service, or charging different prices. However note that we do not discriminate against any of our visitors or customers. |

Subject to certain legal limitations and exceptions, you may be able to exercise some or all of the rights detailed above by filling out the Data Subject Request (“DSR”) form available [here](#), and send it to: Risco-dpo@riscogroup.com. We will always maintain the privacy and security of such evidence.

We will respond to a verifiable request within the timeframes set by applicable US Privacy Laws (usually up to 45 days). We reserve the right to ask for reasonable evidence to verify your identity before providing you with any such information per applicable law, including requesting a photo ID or other similar documentation and records. If we determine that the request warrants a fee, we will tell you why we made such a decision and provide you with a cost estimate before completing your request.

Further, certain rights can be easily executed independently by you without the need to contact us, for example: (i) You can opt-out from receiving our marketing emails by clicking the “unsubscribe” link; (ii) You can use the cookie settings tool on our Website to change your preferences; (iii) you can use certain third party technologies and interfaces, including through your browser settings or mechanisms such as the DAA or NAI.

Authorized Agents

In certain circumstances, and subject to applicable US Privacy Laws, you may permit an authorized agent to submit requests on your behalf. The authorized agent must provide a letter signed by you confirming the agent has permission to submit a request on your behalf or provide sufficient evidence to show that the authorized agent has been lawfully vested with power of attorney. For security purposes, we may need to verify your identity and confirm directly with you that you have provided the authorized agent with permission to submit the request, and it may take additional time to fulfil agent-submitted requests. We may deny a request in the event we are not able to verify the authorized agent’s authority to act on your behalf. Please note that for privacy and security reasons, we will direct future communications to the individual on whose behalf the request was made.



Appeal Rights

Depending on your state of residency, you may be able to appeal a decision we have made in connection with your privacy rights request, by contacting us as instructed in our response. Please send your appeal request with a summary of the request and decision you want to appeal to Risco-dpo@riscogroup.com.

Not more than 60 days after receipt of an appeal, and always in accordance with the timelines set by the applicable US Privacy Laws, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reason for the decision.

If you are not happy with our response, depending on your jurisdiction, you may have the right to lodge a complaint against us with the relevant State's Attorney General:

- Colorado Attorney General as follows: Colorado AG at <https://coag.gov/file-complaint> .
- Connecticut Attorney General at link: <https://www.dir.ct.gov/ag/complaint/> or by phone (860) 808-5318.
- Virginia Attorney General at <https://www.oag.state.va.us/consumercomplaintform> .
- Utah Attorney General at <https://www.attorneygeneral.utah.gov/contact/complaint-form/>.
- Texas Attorney General at <https://www.texasattorneygeneral.gov/consumer-protection/file-consumer-complaint>.
- Oregon Attorney General at <https://www.doj.state.or.us/consumer-protection/contact-us/>.
- Montana Attorney General at <https://dojmt.gov/consumer/consumer-complaints/>.
- Nebraska Attorney General <https://ago.nebraska.gov/constituent-complaint-form>.
- New Jersey Attorney General at <https://www.njoag.gov/contact/file-a-complaint/>.
- New Hampshire Attorney General at <https://onlineforms.nh.gov/app/#/formversion/e0c5d644-c9d8-4056-a7cc-24d29c446fcb>.
- Delaware Attorney General at <https://attorneygeneral.delaware.gov/fraud/cmu/complaint/>.
- Iowa Attorney General at <https://www.iowaattorneygeneral.gov/for-consumers/file-a-consumer-complaint>.