# Privacy policy of WabluPC.online.com

This application collects personal data from its users.

# Provider and person responsible

WabluPC-online

E-mail address of the provider: service@wablupc-online.com

# Types of data collected

The Personal Data that this Application processes, independently or through third parties, includes Cookie; Usage Data.

Full details on each type of Personal Data processed are provided in the dedicated sections of this privacy policy or selectively through explanatory texts displayed prior to the Data collection. Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Application.

Unless otherwise specified, the provision of all data requested by this application is mandatory. If the User refuses to provide the Data, this may not be able to provide its services to the User. In cases where this Application explicitly states that the provision of Personal Data is optional, Users may choose to provide this Data without any consequences for the availability or functionality of the Service.

service.

Users who are unclear about which personal data is mandatory can contact the provider.

Any use of Cookies - or other tracking tools - by this Application or third-party service providers used by this Application serves the purpose of providing the Service required by the User, in addition to any other purposes described in this document and in the Cookie Policy.

Users are responsible for all personal data of third parties that is obtained, published or shared through this application.

# Type and place of data processing

# **Processing methods**

The provider processes the personal data of users in a proper manner and takes appropriate security measures to prevent unauthorized access and the unauthorized forwarding, modification or destruction of data.

Data processing is carried out using computers or IT-based systems in accordance with organizational procedures and practices that are specifically aimed at the stated purposes. In addition to the Controllerother parties may operate this Application and have access to the Data, either internally (such as human resources, sales, marketing, legal, system administrators) or externally (such as providers of technical services, delivery companies, hosting providers, IT companies or communication agencies), appointed by the Controller as Data Processors where necessary. An up-to-date list of these parties can be requested from the provider at any time.

#### **Place**

The data is processed at the provider's branch and at all other locations where the offices involved in the data processing are located.

Depending on the location of the users, data transfers may involve the transfer of the user's data to a country other than the include their own. To find out more about the place of processing of the transmitted data, users can consult the section with detailed information on the processing of personal data.

#### **Storage duration**

Unless otherwise specified in this document, Personal Data will be processed and stored for long as required by the purpose for which it was collected and may be stored for a longer period of time if necessary due to a legal obligation to be fulfilled or based on the User's consent.

# Purposes of the processing

Personal data about the user is collected so that the provider can provide the service and also comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of users or third parties), detect malicious or fraudulent activity. In addition, data is collected for the following purposes: Analytics.

Users can find more detailed information on these processing purposes and the personal data used for each purpose in the "Detailed information on the processing of personal data" section of this document.

# Detailed information on the processing of personal data

Personal data is collected for the following purposes when using the following services:

## **Analytics**

With the services listed in this section, the provider can monitor and analyze data traffic and track the behavior of users.

#### Google Analytics (Universal Analytics) (Google Ireland Limited)

Google Analytics (Universal Analytics) is a web analytics service provided by Google Ireland Limited ("Google"). Google utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services.

Google can use the collected data to contextualize and personalize the ads of its own advertising network.

Further information on the use of data by Google can be found in Google's Partner Policy. Processed personal data: Cookie;

Usage data.

Processing location: Ireland - Privacy Policy - Opt Out.

Category of personal information collected under CCPA: Information about activities on the Internet or other digital networks.

This data processing the following:

• a data sale in the United States

# **Cookie Policy**

This application uses trackers. Further information can be found in the cookie policy.

# **Further information for users**

# Legal basis of the processing

The provider may only process users' personal data if one of the following points applies:

- Users have given their consent for one or more specific purposes.
- the data collection is necessary for the fulfillment of a contract with the user and/or for pre-contractual measures;
- the processing is necessary for compliance with a legal obligation to which the provider is subject;
- the processing is related to a task carried out in the public interest or in the exercise of official authority vested in the provider;
- processing is necessary for the purposes of the legitimate interests pursued by the provider or by a third party.

In any case, the provider will be happy to provide information about the specific legal basis on which the processing is, in particular whether the provision of personal data is a legal or contractual obligation or a prerequisite for the conclusion of a contract.

#### Further information on the storage period

Unless otherwise specified in this document, Personal Data will be processed and stored for long as required by the purpose for which it was collected and may be stored for a longer period of time if necessary due to a legal obligation to be fulfilled or based on the User's consent.

#### Therefore:

- Personal data collected for the purpose of fulfilling a contract concluded between the provider and the user will be stored until this contract has been completely fulfilled.
- Personal data collected to protect the legitimate interests of the provider will be retained for as long as necessary to fulfill
  these purposes. Users can obtain more information about the legitimate interests pursued by the Owner in the relevant
  sections of this document or by contacting the Owner.

Furthermore, the provider is permitted to store personal data for a longer period of time if the user has consented to such processing, as long as the consent is not revoked. Furthermore, the provider may be obliged to store personal data for a longer period of time if this is necessary to fulfill a legal obligation or by order of an authority.

After the retention period has expired, personal data will be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be asserted after the retention period has expired.

# The rights of users under the General Data Protection Regulation (GDPR)

Users may exercise certain rights in relation to their data processed by the Provider. In particular, users

have the right to do the following to the extent permitted by law:

- Revoke consent at any time. If the user has previously consented to the processing of personal data, they can withdraw their consent at any time.
- object to the processing of their data. The user has the right to object to the processing of their data if the processing is carried out on a legal basis other than consent.
- receive information about their data. The user has the right to know whether the data is being processed by the provider, to receive information about individual aspects of the processing and to receive a copy of the data.
- Verification and rectification. The user has the right to check the accuracy of their data and to request that it be updated or corrected.
- request the restriction of the processing of their data. Users have the right to restrict the processing of their data. In this case, the provider will not process the data for any purpose other than storage.
- request the deletion or other removal of personal data. Users have the right to request the provider to delete their data.
- Receive your data and have it transferred to another controller. The user has the right to receive their data in a structured, commonly used and machine-readable format and, where technically feasible, to have it transmitted to another controller without hindrance.
- Lodge a complaint. Users have the right to lodge a complaint with the competent supervisory authority.

Users also have the right to be informed of the legal basis for the transfer of data abroad or to an international organization governed by international law or established by two or more countries, such as the UN, and of the security measures taken by the provider to protect their data.

#### Details on the right to object to processing

If personal data are processed in the public interest, in the exercise of an official authority vested in the provider or to protect the legitimate interests of the provider, the user may object to this processing. processing by providing a justification to his or her particular situation.

Users are informed that they can object to the processing of their personal data for direct marketing purposes at any time free of charge and without giving reasons. If the user objects to processing for direct marketing purposes, the personal data will no longer be processed for these purposes. Users can find out whether the provider processes personal data for direct marketing purposes in the relevant sections this document.

#### How the rights can be exercised

All requests to exercise user rights may be addressed to the Owner using the contact details provided in this document. These requests can be made free of charge and will be answered by the Owner as soon as possible, at the latest within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner

all recipients to whom personal data has been disclosed, if any. Unless this proves impossible or involves a disproportionate effort. The provider shall inform the user of these recipients if the user so requests.

# Further information for users in Switzerland

This section applies to users in Switzerland and replaces all other possibly differing or contradictory information in the privacy policy for these users.

Further details on the categories of data processed, the purposes of processing, the categories of recipients of the personal data, if any, the retention period and other information on personal data can be found in the section "Detailed information on the processing of personal data" in this document.

## Users' rights under the Swiss Federal Act on Data Protection

Users may exercise certain rights in relation to their data in accordance with the law, including the following:

- Right of access to personal data;
- the right to object to the processing of their personal data (which also allows users to request the restriction of the processing of personal data, the deletion or destruction of personal data and the prohibition of the disclosure of certain personal data to third parties);
- the right to receive their personal data and to transmit it to another controller (data portability);
- the right to request the rectification of inaccurate personal data.

#### How to exercise these rights

All requests to exercise user rights may be addressed to the Owner using the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as soon as possible, providing users with the information required by law.

# Further information for users in Brazil

This section supplements and completes the information contained in the remaining sections of the Privacy Policy and is provided by this Application or, where applicable, by its parent or subsidiary and/or related companies (collectively referred to as "we", "us" and "our" for the purposes of this section).

This section applies to all users residing in Brazil (users are hereinafter to as "you" and "your") in accordance with the Brazilian Data Protection Law "Lei Geral de Proteção de Dados" ("LGPD"), and for such users it supersedes any other provisions in the Privacy Policy that may differ or conflict with it.

Within this section of the document, the term "personal information" is used in accordance with the definition from the (**LGPD**).

# Legal basis for the processing of your personal information

We may only process your personal information if there is a legal basis for the processing. The legal bases for processing are as follows:

- Your consent to the processing activities in question
- the fulfillment of a legal or regulatory obligation to which we are subject
- the implementation of public law tasks arising from a law, regulation, contract, agreement or similar legal text
- Studies by research institutes, preferably based on anonymized personal information
- the performance of a contract and pre-contractual measures, if you are a party to said contract
- safeguarding our rights in court, official and arbitration proceedings
- the protection of your physical safety or that of a third party
- health protection in procedures carried out by healthcare personnel or facilities
- our legitimate interests, provided that your fundamental rights and freedoms do not prevail, and
- the protection of claims.

For more information about the legal basis, you can contact us at any time using the contact details in this document.

# Categories of personal information processed

You can find out which categories of personal data are processed in the section "Detailed information on the processing of personal data" in this document.

# Why we process personal information

You can find out why we process personal information in the sections "Detailed information on the processing of personal data" and "Purposes of processing" in this document.

# Your data protection rights under Brazilian law, how you can make a request and how we respond to it

## Your data protection rights under Brazilian law

You have the right:

- to obtain information about whether your personal information processed;
- gain access to your personal information;
- to have incomplete, inaccurate or outdated personal information corrected;
- request the anonymization, blocking or deletion of unnecessary or superfluous personal information, as well as personal information that is not processed in accordance with the LGPD;
- Obtain details of third parties with whom we share your personal information;
- upon your express request and subject to the protection of our company and business secrets, to effect the transfer of personal information (with the exception of anonymized information) to another service or product provider;
- to request the deletion of your personal information, provided that the processing was based on your consent, unless at least one of the exceptions under Art. 16 LGPD applies;
- to withdraw your consent at any time;
- file a complaint regarding your personal information with the ANPD (the federal data protection authority) or with a consumer protection agency;
- to object to the processing of personal information unless it lawful;
- receive comprehensible and appropriate information on the criteria and procedures for automated decision-making; and
- to request a review of a decision that was made solely on the basis of the automated processing of your personal information and that affects your legitimate interests. This concerns decisions about your personal or professional profile, your consumer profile or your creditworthiness, as well as characteristics of your personality.

You will not experience discrimination or suffer any other disadvantages as a result of exercising your rights.

#### How to submit your request

You can make your express request to exercise your rights at any time and free of charge via the contact details in this document or via our legal representative.

#### How we respond to your request

We endeavor to process your request immediately.

If we are unable to do so, we will inform you of the factual or legal reasons why cannot or cannot immediately respond to your request. If we are unable to process your personal information, we will, where we are able to do so, refer you to the natural or legal person to whom you should submit your request.

If you submit a request for **access** to personal information or for **confirmation of the processing of** personal information, please indicate whether your personal information should be provided electronically or in paper form.

You must also tell us whether you want us to answer your request immediately - in which case we will reply in a simplified form - or whether you require full information.

If the latter is the case, we will respond to you within 15 days of your request and provide you with full details of the source of your personal information, confirmation of whether records exist and the processing criteria and purposes, while respecting our corporate and commercial confidentiality.

If you to request **the rectification, erasure, anonymization or blocking of personal information** we will ensure that your application is forwarded without delay to the bodies with which we can discuss your request.

personal information to enable them to fulfill your request, unless such forwarding proves impossible or involves unreasonable effort on our part.

# Lawful transfer of personal information outside Brazil

We may transfer your personal information outside Brazil in the following cases:

- The transfer is necessary for international cooperation between public security, investigation or prosecution authorities in accordance with the lawful procedures under international law.
- The transfer is necessary to protect your life, your physical safety or the life or physical safety of third parties.
- The transmission was approved by the ANPD.
- The transfer results from an obligation within an international cooperation agreement.
- The transfer is necessary for the performance of a task under public law or a public task assigned by law.
- The transfer is necessary for the fulfillment of a legal or regulatory obligation, for the performance of a contract or for precontractual measures in connection with a contract or for the regular exercise of rights in judicial, administrative or arbitration proceedings.

# **Further information for Users in the United States**

This part of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the business running this Application and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as "we", "us", "our").

The information contained in this section applies to all Users (Users are referred to below, simply as "you", "your", "yours"), who are residents in the following states: California, Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska and Montana.

For such Users, this information supersedes any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the term Personal Information.

#### **Notice at collection**

The following Notice at collection provides you with timely notice about the categories of Personal Information collected or disclosed in the past 12 months so that you can exercise meaningful control over our use of that Information.

While such categorization of Personal Information is mainly based on California privacy laws, it can also be helpful for anyone who is not a California resident to get a general idea of what types of Personal Information are collected.

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# Internet or other electronic network activity information

**1** You can read the definitions of these concepts inside the "Definitions and legal references section" of the privacy policy.

To know more about your rights in particular to opt out of certain processing activities you can refer to the "Your privacy rights under US state laws" section of our privacy policy.

For more details on the collection of Personal Information, please read the section "<u>Detailed information on the processing of Personal Data</u>" of our privacy policy.

We won't process your Information for unexpected purposes, or for purposes that are not reasonably necessary to and compatible with the purposes originally disclosed, without your consent.

### What are the sources of the Personal Information we collect?

We collect the above-mentioned categories of Personal Information, either directly or indirectly, from you when you use this Application.

For example, you directly provide your Personal Information when you submit requests via any forms on this Application. You also provide Personal Information indirectly when you navigate this Application, as Personal Information about you is automatically observed and collected.

Finally, we may collect your Personal Information from third parties that work with us in connection with the Service or with the functioning of this Application and features thereof.

# Your privacy rights under US state laws

You may exercise certain rights regarding your Personal Information. In particular, to the extent permitted by applicable law, you have:

- the right to access Personal Information: the right to know. You have the right to request that we confirm whether or not we are processing your Personal Information. You also have the right to access such Personal Information;
- the right to correct inaccurate Personal Information. You have the right to request that we correct any inaccurate Personal Information we maintain about you;
- the right to request the deletion of your Personal Information. You have the right to request that we delete any of your Personal Information;
- the right to obtain a copy of your Personal Information. We will provide your Personal Information in a portable and usable format that allows you to transfer data easily to another entity provided that this is technically feasible;
- the right to opt out from the Sale of your Personal Information; We will not discriminate against you for exercising your privacy rights.
- the right to non-discrimination.

### Additional rights for users residing in California

In addition to the rights listed above common to all Users in the United States, as a User residing in California, you have

- The right to opt out of the Sharing of your Personal Information for cross-context behavioral advertising;
- The right to request to limit our use or disclosure of your Sensitive Personal Information to only that which is necessary to perform the services or provide the goods, as is reasonably expected by an average consumer. Please note that certain exceptions outlined in the law may apply, such as, when the collection and processing of Sensitive Personal Information is necessary to verify or maintain the quality or safety of our service.

Additional rights for Users residing in Virginia, Colorado, Connecticut, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska and Montana

In addition to the rights listed above common to all Users in the United States, as a User residing in Virginia, Colorado, Connecticut, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska and Montana you have

- The right to opt out of the processing of your personal information for Targeted Advertising or profiling in furtherance of decisions that produce legal or similarly significant effects concerning you;
- The right to freely give, deny or withdraw your consent for the processing of your Sensitive Personal Information.

  Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer.

#### Additional rights for users residing in Utah and Iowa

In addition to the rights listed above common to all Users in the United States, as a User residing in Utah and Iowa, you have

- The right to opt out of the processing of your Personal Information for Targeted Advertising;
- The right to opt out of the processing of your Sensitive Personal Information. Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer.

# How to exercise your privacy rights under US state laws

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document.

For us to respond to your request, we must know who you are. We will not respond to any request if we are unable to verify your identity and therefore confirm the Personal Information in our possession relates to you. You are not required to create an account with us to submit your request. We will use any Personal Information collected from you in connection with the verification of your request solely for verification and shall not further disclose the Personal Information, retain it longer than necessary for purposes of verification, or use it for unrelated purposes.

If you are an adult, you can make a request on behalf of a child under your parental authority.

### How to exercise your rights to opt out

In addition to what is stated above, to exercise your right to opt-out of Sale or Sharing and Targeted Advertising you can also use the privacy choices link provided on this Application.

If you want to submit requests to opt out of Sale or Sharing and Targeted Advertising activities via a user-enabled **global privacy control**, such as for example the Global Privacy Control (<u>"GPC"</u>), you are free to do so and we will abide by such request in a frictionless manner.

#### How and when we are expected to handle your request

We will respond to your request without undue delay, but in all cases within the timeframe required by applicable law. Should we need more time, we will explain to you the reasons why, and how much more time we need.

Should we deny your request, we will explain to you the reasons behind our denial (where envisaged by applicable law you may then contact the relevant authority to submit a complaint).

We do not charge a fee to process or respond to your request unless such request is manifestly unfounded or excessive and in all other cases where it is permitted by the applicable law. In such cases, we may charge a reasonable fee or refuse to act on the request. In either case, we will communicate our choices and explain the reasons behind them.

# Further information on the collection and processing of data

## Legal measures

The User's personal data may be processed by the Provider for the purposes of enforcing rights within or in preparation for legal proceedings arising from the improper use of this Application or the associated services.

The user declares that he is aware that the provider could be obliged by the authorities to disclose personal data.

# Further information about the user's personal data

In addition to the information contained in this privacy policy, this Application may provide the User with additional contextual information concerning particular Services or the collection and processing of Personal Data upon request.

# System logs and maintenance

This Application and third-party services may collect files for operation and maintenance purposes that record the interaction taking place via this Application (system logs) or use other Personal Data (e.g. IP address) for this purpose.

# Information not contained in this privacy policy

Further information on the collection or processing of personal data can be requested from the provider at any time using the contact details provided.

# Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within this Application and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. Users are therefore advised to read this

page regularly and in particular to check the date of the last change indicated at the bottom of the page.

If changes affect the use of data based on the user's consent, the provider will - if necessary - obtain new consent.

# **Definitions and legal information**

#### Personal data (or data) / Personal information (or information)

Any information that directly or in combination with other information identifies or can be used to identify a natural person.

#### Sensitive personal information

Sensitive personal information is personal information that is not publicly available and contains information that is considered sensitive under applicable data protection law.

#### Usage data

Information that this application (or third-party services that this application uses) collects automatically, such as: the IP addresses or domain names of the computers of users who use this application, the URI addresses (Uniform Resource Identifier), the time of the request, the method used to send the request to the server, the size of the response file received, the numerical code indicating the status of the server response (successful result, error, etc.), the country of origin, the functions of the browser and operating system used by the user, the various time details per request (e.g. how much time was spent on each page of the application) and information on the path followed within the application. This information includes the country of origin, the functions of the browser and operating system used by the user, the various time details per request (e.g. how much time was spent on each page of the application) and details of the path followed within an application, in particular the sequence of pages visited, as well as other information about the device's operating system and/or the user's IT environment.

#### Users

The person using this application who, unless otherwise specified, is the same as the data subject.

#### Affected party

The natural person to whom the personal data relates.

#### **Processor (or processor)**

Natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller as described in this privacy policy.

#### Responsible party (or provider, sometimes also owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data, including the security measures concerning the operation and use of this Application. Insofar as nothing

If not otherwise stated, the controller is the natural or legal person through whom this application is offered.

# This application

The hardware or software tool with which the user's personal data is collected and processed.

### Service

The service offered by this application as described in the relevant terms and conditions (if any) and on this website/application.

# Data sale

Data sale means any exchange of personal information by the owner to a third party for money or other valuable consideration, as defined by applicable U.S. federal privacy law. Please note that the exchange of personal information with a service provider under a written contract that meets the requirements of applicable law does not constitute a sale of your personal information.

#### Data transfer

Data disclosure means any disclosure, rental, release, disclosure, dissemination, making available, transfer or other oral, written, electronic or other transmission of the personal data of a data subject.

Consumer by the Company to a **third party for cross-contextual behavioral advertising**, whether in exchange for money or other valuable consideration, including transactions between a Company and a third party for cross-contextual behavioral advertising for the benefit of a Company where no money exchanged, as defined in California privacy laws. Please note that sharing personal information with a service provider under a written contract that meets the requirements of California privacy laws does not constitute an onward transfer of your personal information.

# Targeted advertising

Targeted advertising means displaying advertising to a consumer that is selected based on personal information obtained from the consumer's activities over time and across unaffiliated websites or online applications to predict the consumer's preferences or interests, as defined by applicable U.S. state privacy law.

#### European Union (or EU)

Unless otherwise stated, all references in this document to the European Union refer to all current Member States of the European Union and the European Economic Area (EEA).

#### Cookie

Cookies are trackers that consist of a small data record stored in the user's browser.

#### Tracker

The term tracker refers to any technology - e.g. cookies, unique identifiers, web beacons, embedded scripts, e-tags or fingerprinting - that can be used to track users, e.g. by enabling access to or storage of information on the user device.

# Legal notice

This privacy policy has been drawn up on the basis of the provisions of various legislations.

This privacy policy applies exclusively to this application, unless otherwise stated in this document.

Last update: April 17, 2025