



EFFECTIVE DATE: 29 August 2018

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ANNEX 2:

Privacy Policy

AL Idilio Studio LTD takes data privacy seriously. This privacy policy explains who we are, how we collect, share and use Personal Information, and how you can exercise your privacy rights when you use our Website and the choices you have associated with that data.

You are also reading this data protection information due to the compliance with the **European Union's General Data Protection Regulation (GDPR)**, came into force on 25th May, 2018. **AL Idilio Studio LTD** guarantees to protect and act with respect towards the privacy of the personal data of our **clients**, our **clients' clientele** and **website visitors**.

We recommend that you read this privacy policy in full to ensure you are fully informed. However, to make it easier for you to review the parts of this privacy policy that apply to you, we have divided up the document into sections that are specifically applicable to **Clients** (Section 2), **Clients' Clientele** (Section 3), and **Website Visitors** (Section 4). Sections 1 and 5 are applicable to everyone.

If you have any questions or concerns about our use of your Personal Information, then please contact us using the contact details provided at the end of Section 5. At times, we may update our privacy policy without giving you notice, so we suggest to please check this each time you visit our website.

Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible from www.idiliostudio.com.



1. Introduction

1.1. Who We Are

AL Idilio Studio LTD (company registration number: **HE 371655**, company registered seat: **4, Parodos 49th street, 4152 Limassol, Cyprus, Europe**, hereinafter referred as: **"we"**, **"us"**, **"our"**, **"Idilio Studio"** and **"AL Idilio Studio LTD"**) is a creative studio operating www.idiliostudio.com, developing development/design and web-based services (hereinafter referred as: **"Website"** or **"Services"**).

1.2. Key Terms

In this privacy policy, these terms have the following meanings:

- 1.2.1. **"Client"** means any person or entity that is registered with us to use the Services.
- 1.2.2. **"Client's Client"** or **"Client's Clientele"** is a person to whom a direct Client of ours may resell our Services. In other words, a Client's Client is anyone about whom a direct Client has given us information (for example for invoicing purposes).
- 1.2.3. **"Personal Information"** means any information that identifies or can be used to identify a Client, a Client's Client, or a Visitor, directly or indirectly. Examples of Personal Information include, but are not limited to, first and last name, date of birth, email address, gender, occupation, or other demographic information.
- 1.2.4. **"Website(s)"** means any website(s) we own and operate (such as www.idiliostudio.com) or any web pages, interactive features, applications, widgets, blogs, social networks, social network "tabs," or other online, mobile, or wireless offerings that post a link to this privacy policy.
- 1.2.5. **"Visitor"** means any person who visits any of our Websites.



1.2.6. **“You”** and **“your”** mean, depending on the context, either a Client, a Client’s Client, or a Visitor.

1.3. **Why do we collect data?**

1.3.1. The collection and use of your personal data serve the sole purpose of enabling you to access our website and to be able to offer you an optimum range of services.

1.3.2. We collect information for market research purposes in order to get to know you better and consequently to be able to provide you with a better service, or on what you do on our website.

1.3.3. These data are used to see which areas of our website and internet service interest you the most.

By using our Website and services, you agree to the collection and use of information in accordance with this policy. If you have no interest in being kept up-to-date on the latest developments, as well as current information on products, offers and services, you can tell us at any time.

2. **Privacy for Clients**

This section applies to the Personal Information we collect and process from a Client or potential Client through the direct provision of the Services. If you are not a direct Client, the Clients’ Clientele or Visitors section of this policy may be more applicable to you and your data. **In this section, “you” and “your” refer to Clients and potential Clients.**

2.1. **Information we collect**

The Personal Information that we may collect broadly falls into the following categories:

2.1.1. **Information you provide to us:** In the course of engaging with our Services, you may provide Personal Information about you



and your Contacts (in case you resell our Services). Personal Information is often, but not exclusively, provided to us when you sign up for and use the Services, purchase a Service or a product, get invoiced, consult with our customer service team, send us an email, integrate the Services with another website or service, or communicate with us in any other way. We will let you know prior to collection whether the provision of Personal Information we are collecting is compulsory or if it may be provided on a voluntary basis and the consequences, if any, of not providing the information. By giving us this information, you agree to this information being collected, used and disclosed as described in our Terms and Conditions and in this privacy policy. This information may include:

2.1.1.1. **Registration information:** When you register for an account, you will be asked to provide certain basic information, such as your first name, last name, email address, username, password, company name, location, and phone number.

2.1.1.2. **Billing and communications information:** If you purchase our Services, you may also need to provide us with payment and billing information, such as your credit card details and billing address. Idilio Studio will also maintain a record of your billing transactions and purchases, and any communications and responses.

2.1.1.3. **Information we process on your behalf:** In order to assist directly your own Clients, you need to provide us information about your Clients, such as their names and email addresses. We use and process this information to provide the Services in accordance with your instructions.

2.1.2. **Information we collect automatically:** When you use the Services, we may automatically collect certain information about your device and usage of the Services/Website. We use cookies and other tracking technologies to collect some of this information. Our use of cookies and other tracking technologies



is discussed more below, and in more detail in our [Cookie Policy](#).

This information may include:

2.1.2.1. **Device information:** We collect information about the device and applications you use to access our Website and Services, such as your IP address, your operating system, your browser ID, and other information about your system and connection.

2.1.2.2. **Log data:** Our web servers keep log files that record data each time a device accesses those servers and those log files contain data about the nature of each access, including originating IP addresses. We may also access metadata and other information associated with files that you upload into our Services.

2.1.2.3. **Product usage data:** We collect usage data about you whenever you interact with our Website, which may include the dates and times you access the Website and your browsing activities (such as what portions of the Website are used). We also collect information regarding the performance of the Services, including metrics related to the hosting and social media campaigns performance. This information allows us to improve the content and operation of the Services, and facilitate research and analysis of the Services.

2.1.3. **Information we collect from other sources:** From time to time, we may obtain information about you or your Clients from third-party sources, such as public databases, social media platforms, third-party data providers and our joint marketing partners. We take steps to ensure that such third parties are legally or contractually permitted to disclose such information to us. Examples of the information we receive from other sources include:

2.1.3.1. demographic information (such as age and gender),

2.1.3.2. device information (such as IP addresses),

2.1.3.3. location (such as city and state),



2.1.3.4. and online behavioral data (such as information about use of social media websites, page view information and search results and links).

We use this information, alone or in combination with other information (including Personal Information) we collect, to enhance our ability to provide relevant marketing and content to you and to develop and provide you with more relevant products, features, and services.

2.2. Use of Personal Information

We may use the Personal Information we collect through the Services or other sources for a range of reasons, including:

- 2.2.1. **To bill and collect money owed to us by you.** This includes sending you emails, invoices, receipts, notices of delinquency, and alerting you if we need a different credit card number. We use third parties for secure credit card transaction processing, and those third parties collect billing information to process your orders and credit card payments. To learn more about the steps we take to safeguard that data, see the "Our Security" section of this privacy policy.
- 2.2.2. **To send you system alert messages.** For example, we may inform you about temporary or permanent changes to our Services, such as planned outages, or send you account, security or compliance notifications, such as new features, version updates, releases, abuse warnings, and changes to this privacy policy.
- 2.2.3. **To communicate with you about your account and provide customer support.**
- 2.2.4. **To enforce compliance with our Terms of Use and applicable law, and to protect the rights and safety of our Clients and third parties, as well as our own.** This may include developing tools and algorithms that help us prevent violations. For



example, sometimes we review the themes and 3rd party plugins our Clients install on our servers to make sure they comply with our [Terms and Conditions](#). To improve that process, we have software that helps us identify suspicious code patterns that may violate our Terms and Conditions. Our employees or independent associates may review those particular patterns. This benefits all Clients who comply with our [Terms and Conditions](#) because it reduces the amount of security risk and malicious software installed on our servers and helps us maintain high security levels.

- 2.2.5. **To meet legal requirements**, including complying with court orders, valid discovery requests, valid subpoenas, and other appropriate legal mechanisms.
- 2.2.6. **To provide information to representatives and advisors**, including attorneys and accountants, to help us comply with legal, accounting, or security requirements.
- 2.2.7. **To prosecute and defend a court, arbitration, or similar legal proceeding.**
- 2.2.8. **To respond to lawful requests by public authorities**, including to meet national security or law enforcement requirements.
- 2.2.9. **To provide, support and improve the Services.** For example, this may include sharing your or your Clients' information with third parties in order to provide and support our Services or to make certain features of the Services available to you. When we share Personal Information with third parties, we take steps to protect your information by requiring these third parties to enter into a contract with us that requires them to use the Personal Information we transfer to them in a manner that is consistent with this privacy policy and applicable privacy laws.
- 2.2.10. **To provide suggestions to you.** This includes using data to suggest products or services that you may be interested in or that may be relevant to you or your Clients. Some of these suggestions are generated by the use of our data analytics projects, which are described below. For more information about



our use of cookies and other tracking technologies for this purpose, and instructions about how to opt out of having data collected through the use of cookies, please see our [Cookie Policy](#).

2.2.II. **Other purposes.** To carry out other legitimate business purposes, as well as other lawful purposes about which we will notify you.

2.3. **Cookies and Tracking Technologies**

We and our partners may use various technologies to collect and store information when you use our website or services, and this may include using cookies and similar tracking technologies, such as pixels, web beacons, tags, and scripts to improve and analyze our website and effectiveness of our services. They also allow us to collect information such as your IP address, browser, email client type, and other similar details. We use this information to measure the performance of your services and to provide analytics information and enhance the effectiveness of our Services.

Idilio Studio only uses cookies and tracking technologies to monitor the performance of our website, to obtain a better view of which areas of our website are especially popular, how our Clients move around the website and how much time they spend in different areas, so that we can further improve its design, functionality and the user's experience.

Our use of cookies and other tracking technologies is discussed in more detail in our [Cookie Policy](#).

2.4. **Other Data Protection Rights**

You and your Contacts may have the following data protection rights:

2.4.1. **To access, correct, update or request deletion of Personal Information.** Idilio Studio takes reasonable steps to ensure that the data we collect is reliable for its intended use, accurate,



- complete and up to date. As a Client, you can manage many of your individual account and profile settings provided through the User's Profile, or you may contact us directly by [emailing us](#).
- 2.4.2. In addition, individuals who are residents of the EEA can **object to processing** of their Personal Information, ask to **restrict processing** of their Personal Information or **request portability** of their Personal Information. You can exercise these rights by contacting us using the contact details provided in the **"Questions and Concerns" (section 5)**. If any of your Clients wishes to exercise any of these rights, they should contact you directly, or contact us as described in the **"Privacy for Contacts" (section 3)**.
- 2.4.3. Similarly, if Personal Information is collected or processed on the basis of consent, the data subject can **withdraw their consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Information conducted in reliance on lawful processing grounds other than consent.
- 2.4.4. The right to **complain to a data protection authority** about the collection and use of Personal Information. For more information, please contact your local data protection authority. Contact details for data protection authorities in the EEA are available [here](#).

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection law. We may ask you to verify your identity in order to help us respond efficiently to your request. If we receive a request from one of your Clients, we will either direct the Client to reach out to you, or, if appropriate, we may respond directly to their request.



3. Privacy for our Clients' Clientele

This section applies to the information we process about our Clients' Clientele as a data controller pursuant to our legitimate business interests. Our Services are intended for use by our Clients. As a result, for much of the Personal Information we collect and process about our Clients' Clientele through the Services, we act as a processor on behalf of our Clients. AL Idilio Studio LTD is not responsible for the privacy or security practices of our Clients, which may differ from those set forth in this privacy policy. Please check with individual Clients about the policies they have in place. **For purposes of this section, "you" and "your" refer to our Clients' Clientele.**

3.1. Information We Collect

The Personal Information that we may collect or receive about you broadly falls into the following categories:

- 3.1.1. **Information we receive about you from our direct Clients:** A direct Client of ours may provide Personal Information about you to us through the Services. For example, when a direct Client (reseller) wants us to prepare an offer for you or invoice you for the services you are using or resells the Services to you, they may provide us with certain contact information or other Personal Information about you such as your name, email address, address or telephone number. You may have the opportunity to update some of this information by electing to update or manage your preferences via an email you receive from a Client of ours.
- 3.1.2. **Information we collect automatically:** When you interact with a service that you purchase from a direct Client of ours or browse or purchase from our Website, we may collect information about your device and interaction with our Website or Services. We use cookies and other tracking technologies to collect some of this



information. Our use of cookies and other tracking technologies is discussed more below, and in more detail in our [Cookie Policy](#).

3.1.2.1. **Device information:** We collect information about the device and applications you use to access our Website or our Services, such as your IP address, your operating system, your browser ID, and other information about your system and connection.

3.1.2.2. **Product usage data:** We collect usage data about you whenever you interact with our Website or Services, which may include dates and times you access them and your browsing activities (such as what pages are viewed and the duration). This information allows us to improve the content and operation of the Services, and facilitate research and analysis of the Services.

3.1.3. **Information we collect from other sources:** From time to time, we may obtain information about you from third-party sources, such as social media platforms and third-party data providers. We take steps to ensure that such third parties are legally or contractually permitted to disclose such information to us, and we use this information to provide publicly available social media information about you to our Clients.

3.2. Use of Personal Information

We may use the Personal Information we collect or receive about you for our legitimate business interests, including:

3.2.1. **To bill and collect money owed to us by you if this is what our direct Client requires.** This includes sending you emails, invoices, receipts, notices of delinquency, and alerting you if we need a different credit card number. We use third parties for secure credit card transaction processing, and those third parties collect billing information to process your orders and credit card payments. To learn more about the steps we take to



safeguard that data, see the **“Our Security” (section 5.4)** of this privacy policy.

- 3.2.2. **To enforce compliance with our Terms of Use and applicable law, and to protect the rights and safety of our Members and third parties, as well as our own.** This may include developing tools and algorithms that help us prevent violations. For example, sometimes we review the themes and 3rd party plugins you install on our servers to make sure they comply with our Terms and Conditions. To improve that process, we have software that helps us identify suspicious code patterns that may violate our Terms of Use. Our employees or independent associates may review those particular patterns. This benefits you and all Clients who comply with our Terms of Use because it reduces the amount of security risk and malicious software installed on our servers and helps us maintain high security levels.
- 3.2.3. **To meet legal requirements,** including complying with court orders, valid discovery requests, valid subpoenas, and other appropriate legal mechanisms.
- 3.2.4. **To provide information to representatives and advisors,** including attorneys and accountants, to help us comply with legal, accounting, or security requirements.
- 3.2.5. **To prosecute and defend a court, arbitration, or similar legal proceeding.**
- 3.2.6. **To respond to lawful requests by public authorities,** including to meet national security or law enforcement requirements.
- 3.2.7. **To provide, support and improve the Services.** For example, this may include sharing your or your Clients’ information with third parties in order to provide and support our Services or to make certain features of the Services available to you. When we share Personal Information with third parties, we take steps to protect your information by requiring these third parties to enter into a contract with us that requires them to use the Personal



Information we transfer to them in a manner that is consistent with this privacy policy and applicable privacy laws.

3.2.8. **Other purposes.** To carry out other legitimate business purposes, as well as other lawful purposes.

3.3. **Cookies and Tracking Technologies**

We and our partners may use various technologies to collect and store information when you interact with a direct Client's associated services, and this may include using cookies and similar tracking technologies, such as pixels, web beacons, tags, and scripts to improve and analyze the effectiveness of our services. They also allow us to collect information such as your IP address, browser, email client type, and other similar details. We use this information to measure the performance of our Clients' resold services and to provide analytics information and enhance the effectiveness of our Services.

Our use of cookies and other tracking technologies is discussed in more detail in our [Cookie Policy](#).

3.4. **Legal Basis for Processing**

We process Personal Information about you as a data controller as described in this section, where such processing is in our **legitimate interests** and not overridden by your data protection interests or fundamental rights and freedoms. Our legitimate interests typically include: improving, maintaining, providing, and enhancing our technology, products and services; and ensuring the security of the Services and our Website.

3.5. **Other Data Protection Rights**

You may have the following data protection rights:

3.5.1. **To access, correct, update or request deletion** of your Personal Information. AL Idilio Studio LTD takes reasonable steps to ensure



that the data we collect is reliable for its intended use, accurate, complete, and up to date. You may contact us directly at any time about accessing, correcting, updating or deleting your Personal Information, or altering your data, by [emailing us](#). We will consider your request in accordance with applicable laws.

- 3.5.2. In addition, if you are a resident of the EEA, you can object to processing of your Personal Information, ask us to **restrict processing** of your Personal Information or **request portability** of your Personal Information. Again, you can exercise these rights by [emailing us](#).
- 3.5.3. You have the **right to complain to a data protection authority** about our collection and use of your Personal Information. For more information, please contact your local data protection authority. Contact details for data protection authorities in the EEA are available [here](#).

As described above, for much of the Personal Information we collect and process about Clients' Clientele through the Services, we act as a processor on behalf of our direct Clients. In such cases, if you are a Client's Client and want to exercise any data protection rights that may be available to you under applicable law or have questions or concerns about how your Personal Information is handled by **AL Idilio Studio LTD** as a processor on behalf of our individual Clients, you should contact the relevant Clients that is using our Services, and refer to their separate privacy policies.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. We may ask you to verify your identity in order to help us respond effectively to your request.



4. Privacy for Website Visitors

This section applies to Personal Information that we collect and process through our Websites and in the usual course of our business, such as in connection with our recruitment, events, sales and marketing activities. **In this section “you” and “your” refers to Visitors.**

4.1. Information We Collect

4.1.1. Information you provide to us on the Websites or otherwise:

Certain parts of our Websites may ask you to provide Personal Information voluntarily. For example, we may ask you to provide certain Personal Information (such as your name, contact details, company name, profile information) in order to contact us, to register an account, request support, or otherwise submit inquiries to us. We may also collect Personal Information, such as your contact and job details and feedback, when you attend our events, take part in surveys, or through other business or marketing interactions we may have with you. You may choose to provide additional information when you communicate with us or otherwise interact with us, and we will keep copies of any such communications for our records. The Personal Information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your Personal Information. We will also let you know prior to collection whether the provision of the Personal Information we are collecting is compulsory or may be provided on a voluntary basis and the consequences, if any, of not providing the information.

4.1.2. Information we collect automatically through the Websites:

When you visit our Websites, we may also collect certain information automatically from your device. In some countries, including countries in the European Economic Area, this information may be considered Personal Information under applicable data protection laws. Specifically, the information we



collect automatically may include your IP address, your operating system, your browser ID, your browsing activity, and other information about your system and connection and how you interact with our Websites and other websites. We may collect this information as a part of log files as well as through the use of cookies or other tracking technologies. Our use of cookies and other tracking technologies is discussed in more detail in our [Cookie Policy](#).

4.2. Use of Personal Information

We may use the information we collect through our Websites for a range of reasons, including:

- 4.2.1. To provide, operate, optimize, and maintain our Websites.
- 4.2.2. To send you information for marketing purposes, in accordance with your marketing preferences.
- 4.2.3. For recruitment purposes, if you have applied for a role with Idilio Studio.
- 4.2.4. To respond to your online inquiries and requests, and to provide you with information and access to resources or services that you have requested from us.
- 4.2.5. To manage our Websites and system administration and security.
- 4.2.6. To improve the navigation and content of our Websites.
- 4.2.7. To identify any server problems or other IT or network issues.
- 4.2.8. To process transactions and to set up online accounts.
- 4.2.9. To compile aggregated statistics about site usage and to better understand the preferences of our Visitors.
- 4.2.10. To carry out research and development to improve our products and services.
- 4.2.11. To customize the content and layout of the Websites.
- 4.2.12. To carry out other legitimate business purposes, as well as other lawful purposes.



4.2.13. In addition, we may combine Personal Information with other information we collect or obtain about you (such as information we source from our third-party partners) to serve you specifically, such as to deliver a product or service according to your preferences or restrictions, or for advertising or targeting purposes in accordance with this privacy policy. When we combine Personal Information with other information in this way, we treat it as, and apply all of the safeguards in this privacy policy applicable to, Personal Information.

4.3. **Public Information and Third-Party Websites**

4.3.1. **Blog.** We have public blogs on our Websites. Any information you include in a comment on our blog may be read, collected, and used by anyone. If your Personal Information appears on our blogs and you want it removed, contact us here. If we are unable to remove your information, we will tell you why.

4.3.2. **Social media platforms and widgets.** Our Websites include social media features, such as the Facebook Like button. These features may collect information about your IP address and which page you are visiting on our Website, and they may set a cookie to make sure the feature functions properly. Social media features and widgets are either hosted by a third party or hosted directly on our Website. We also maintain presences on social media platforms, including Facebook, LinkedIn, Instagram, Pinterest and YouTube. Any information, communications, or materials you submit to us via a social media platform is done at your own risk without any expectation of privacy. We cannot control the actions of other users of these platforms or the actions of the platforms themselves. Your interactions with those features and platforms are governed by the privacy policies of the companies that provide them.

4.3.3. **Links to third-party websites.** Our Websites include links to other websites, whose privacy practices may be different from ours. If you submit Personal Information to any of those sites, your information is governed by their privacy policies. We



encourage you to carefully read the privacy policy of any website you visit.

4.3.4. **Contests and sweepstakes.** We may, from time to time, offer surveys, contests, sweepstakes, or other promotions on our Websites or through social media (collectively, "**Promotions**"). Participation in our Promotions is completely voluntary. Information requested for entry may include Personal Information such as your name, address, date of birth, phone number, email address, username, and similar details. We use the information you provide to administer our Promotions. We may also, unless prohibited by the Promotion's rules or law, use the information provided to communicate with you, or other people you select, about our Services. We may share this information with our affiliates and other organizations or service providers in line with this privacy policy and the rules posted for our Promotions.

4.4. **Cookies and Tracking Technologies.** We use cookies and similar tracking technologies to collect and use Personal Information about you, including to serve interest-based advertising. For further information about the types of cookies and tracking technologies we use, why, and how you can control them, please see our [Cookie Policy](#).

4.5. **Other Data Protection Rights.** You have the following data protection rights:

4.5.1. To **access, correct, update, or request deletion** of your Personal Information. Idilio Studio takes reasonable steps to ensure that the data we collect is reliable for its intended use, accurate, complete, and up to date. You may contact us directly at any time about accessing, correcting, updating, or deleting your Personal Information, or altering your data or marketing preferences by [emailing us](#). We will consider your request in accordance with applicable laws.

4.5.2. In addition, if you are a resident of the EEA, you can **object to processing** of your Personal Information, ask us to **restrict processing** of your Personal Information or **request portability**



of your Personal Information. Again, you can exercise these rights by [emailing us](#).

4.5.3. Similarly, if we have collected and processed your Personal Information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Information conducted in reliance on lawful processing grounds other than consent.

4.5.4. You have the **right to complain to a data protection authority** about our collection and use of your Personal Information. For more information, please contact your local data protection authority. Contact details for data protection authorities in the EEA are available [here](#).

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. We may ask you to verify your identity in order to help us respond effectively to your request.

5. General Information

5.1. How We Share Information

We may share and disclose your Personal Information to the following types of third parties for the purposes described in this privacy policy **(for purposes of this section, “you” and “your” refer to Clients, Clients’ Clientele, and Visitors unless otherwise indicated)**:

5.1.1. **Our service providers:** Sometimes, we share your information with our third-party service providers, who help us provide and support our Services and other business-related functions. For example, if it is necessary to provide Clients something they



have requested (like enabling a feature on a hosting account), then we may share Clients' or Client's Clients' Personal Information with a service provider for that purpose. Other examples include analyzing data, hosting data, engaging technical support for our Services, processing payments, and delivering content. These third-party service providers enter into a contract that requires them to use your Personal Information only for the provision of services to us and in a manner that is consistent with this privacy policy.

- 5.1.2. **Advertising partners:** We may partner with third-party advertising networks and exchanges to display advertising on our Websites or to manage and serve our advertising on other sites and may share Personal Information of Clients and Visitors with them for this purpose. We do not sell or market to any of our Clients' Contacts. We and our third-party partners may use cookies and other tracking technologies, such as pixels and web beacons, to gather information about your activities on our Websites and other sites in order to provide you with targeted advertising based on your browsing activities and interests. For more information about cookies and other tracking technologies, please see our [Cookie Policy](#).
- 5.1.3. **Any competent law enforcement body, regulatory body, government agency, court or other third party** where we believe disclosure is necessary:
- 5.1.3.1. as a matter of applicable law or regulation,
 - 5.1.3.2. to exercise, establish, or defend our legal rights, or
 - 5.1.3.3. to protect your vital interests or those of any other person.
- 5.1.4. **A potential buyer (and its agents and advisors)** in the case of a sale, merger, consolidation, liquidation, reorganization, or acquisition. In that event, any acquirer will be subject to our obligations under this privacy policy, including your rights to access and choice. We will notify you of the change either by sending you an email or posting a notice on our Website.



5.1.5. **Any other person with your consent.**

5.2. **Legal Basis for Processing Personal Information (EEA Persons Only)**

If you are from the European Economic Area, our legal basis for collecting and using the Personal Information described above will depend on the Personal Information concerned and the specific context in which we collect it.

However, we will normally collect and use Personal Information from you where the processing is in our **legitimate interests** and not overridden by your data-protection interests or fundamental rights and freedoms. Typically, our legitimate interests include improving, maintaining, providing, and enhancing our technology, products, and services; ensuring the security of the Services and our Websites; and for our marketing activities.

If you are a Client, we may need the Personal Information to **perform a contract** with you. In some limited cases, we may also have a **legal obligation** to collect Personal Information from you.

If we ask you to provide Personal Information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your Personal Information is mandatory or not, as well as of the possible consequences if you do not provide your Personal Information.

Where required by law, we will collect Personal Information only where we have your **consent** to do so.

If you have questions about or need further information concerning the legal basis on which we collect and use your Personal Information, please contact us using the contact details provided in the **“Questions and Concerns” (section 5.7.)** below.

5.3. **Your Choices and Opt-Outs**



Clients and Visitors who have opted into our marketing emails can opt out of receiving marketing emails from us at any time by clicking the **“unsubscribe”** link at the bottom of our marketing messages.

Also, all opt-out requests can be made by emailing us using the contact details provided in the **“Questions and Concerns” (section 5.7.)** below. Please note that some communications (such as service messages, account notifications, billing information) are considered transactional and necessary for account management, and Clients cannot opt out of these messages unless you cancel your services with us.

5.4. **Our Security**

We take appropriate and reasonable technical and organizational measures to protect Personal Information from loss, misuse, unauthorized access, disclosure, alteration, and destruction, taking into account the risks involved in the processing and the nature of the Personal Information. If you have any questions about the security of your Personal Information, you may contact us by [emailing us](#).

All user accounts require a username and password to log in. Clients must keep their username and password secure, and never disclose it to a third party. Because the information in a Client’s account is so sensitive, account passwords are hashed, which means we cannot see a Client’s password. We cannot resend forgotten passwords either. We will only provide Clients with instructions on how to reset them.

5.5. **Retention of Data**

We retain Personal Information where we have an ongoing legitimate business or legal need to do so. Our retention periods will vary depending on the type of data involved, but, generally, we’ll refer to these criteria in order to determine retention period:



- 5.5.1. Whether we have a legal or contractual need to retain the data.
- 5.5.2. Whether the data is necessary to provide our Services.
- 5.5.3. Whether our Clients have the ability to access and delete the data within their user accounts.
- 5.5.4. Whether our Clients would reasonably expect that we would retain the data until they remove it or until their user accounts are closed or terminated.

When we have no ongoing legitimate business need to process your Personal Information, we will either delete or anonymize it or, if this is not possible (for example, because your Personal Information has been stored in backup archives), then we will securely store your Personal Information and isolate it from any further processing until deletion is possible.

5.6. **Changes to this Policy**

We may change this privacy policy at any time and from time to time. The most recent version of the privacy policy is reflected by the version date located at the top of this privacy policy. All updates and amendments are effective immediately upon notice, which we may give by any means, including, but not limited to, by posting a revised version of this privacy policy or other notice on the Websites. We encourage you to review this privacy policy often to stay informed of changes that may affect you. Our electronically or otherwise properly stored copies of this privacy policy are each deemed to be the true, complete, valid, authentic, and enforceable copy of the version of this privacy policy that was in effect on each respective date you visited the Website.

5.7. **Questions & Concerns**

If you have any questions or a concern about the way in which we have handled any privacy matter, please use our [contact form](#) to send us a message. You may also contact us at:



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For EEA Residents:

For the purposes of EU data protection legislation, **AL Idilio Studio LTD** is the controller of your Personal Information. Our Data Protection Officer can be contacted at support@idiliostudio.com.

For Non-EEA Residents:

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