

## Privacy Policy

Last updated: May 8, 2023

We at Kudurru Stone LLC (hereinafter referred to as **"KudurruStone"**, **"Kudurru Stone"**, **"we"** or **"our"**) are committed to respecting and protecting your privacy. We have developed this Privacy policy (the **"Privacy Policy"**) to help you understand what personal information about you we collect, use, and share and how you can correct or change such information. This Privacy Policy applies to anyone who visits, browses, or otherwise uses the <http://www.kudurrustone.com> website (the **"Website"**), or who otherwise contacts us by mail, email, social media, or telephone in connection with the services we offer (the **"Service(-s)"**) (collectively known as **"User(-s)" "you" or "your"**). This Privacy Policy should be read along with our [Terms of Service](#). Capitalized terms, if not defined in this Privacy Policy, are defined in the Terms of Service.

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#### **1. Information about Data Controller.**

Kudurru Stone LLC, a company registered at 1921 W Cedar Grove St, Meridian, Idaho, 83646, the United States of America, is the data controller in respect of the personal data you share with us. We are accountable for determining the ways and purposes for which we collect and use your personal information. Should you wish to reach out to us directly, our contact information can be found in the "Contact Us" section provided below.

## **2. Age of consent.**

Our Services are not indented for Users younger than 18. We do not knowingly collect any information from children under the age of 13. In the case it comes to our attention that the information collected belongs to a child, that information will immediately be removed. If you believe that we might have any personal information from or about a child under 13, please contact us at [contactus@kudurrustone.com](mailto:contactus@kudurrustone.com).

## **3. Personal Information we collect.**

3.1. Kudurru Stone collects your personal data when you visit our Website, use our Services, contact or interact with the Website and/or Services in any way. We will only collect your personal data in line with applicable laws. We collect your personal data in various ways:

- Voluntarily provided by you (e.g., when you sign up for our Services, purchase Subscriptions or services, and when you browse our Website or contact us by email, social media, or telephone communications).
- Collected automatically from you (e.g., personal data we use to authenticate you or personal data in the form of your IP address or your preferences through the use of cookies placed on the Website, analytics, or other similar technologies).

3.2. Depending on your use of our Services, we may collect the personal information you provide by creating an Account: your name, email address, company information, and location.

3.2.1. If you are creating an Account as a Primary user, you will provide us with: the name of the Primary User, your company name, legal physical address, city, state, and bank account information.

3.2.2. If you are using our Services as an Authorized user by the Primary user (administrators, basic users, or similar), you will provide us your name.

2.2. Payment Information - we may collect details of any requests or transactions you make through our Services. All payment information you submit is collected and used by our payment processors in accordance with their privacy policies.

2.3. We may also collect personal information from you as a result of your email, social media, or telephone communications with us.

2.4. Personal information we automatically generate about you. When you use our Website or use our Services, we may also use cookies or other similar technology to collect extra data, including:

- Your IP address. This is the unique numerical address assigned to a device when it connects to the Internet, which can be used to determine your general location.

- Your device information. This can include details such as the type of device being used, the operating system, and the browser version.
- Your location data. Your IP address can be used to define location data from your device, such as GPS coordinates, to provide location-based services.
- Your browsing history. We may collect data related to your browsing history of the content you have visited on our Website.
- Information on personal preferences and settings on how you interact with our Services and Website.

#### **4. How we use Personal Information.**

4.1. We use personal data collected through our Website and Service only when we have a valid reason and legal basis to do so. We determine the legal grounds based on the purposes for which we have collected your personal data.

4.2. Legal bases for using your personal data we rely on are one of the following:

- Consent. We will use your personal data when we have asked for your consent which you can withdraw at any time in the following cases:
  - For sending marketing emails to you after receiving your permission. You can withdraw your consent at any time by clicking the “unsubscribe” link at the bottom of the email.
  - For placing non-essential cookies or other similar technology on our Website. We provide more details of how we use cookies in the cookie section below. In particular, we use cookies to collect analytics on how our Website is used, including through Google Analytics. You can withdraw your consent to placing these cookies at any time through the Privacy settings link in the footer of our Website.
- Performance of a contract with you. We use your personal data if we need to in order to perform a contract with you. For example, where you have booked a demo version of our Services or purchased a Subscription from us, we will need to use your contact details and payment data in order to process your order and deliver your Subscription, or we may contact you directly via email if you contact us on any issue related to the use of the Service.
- Compliance with the law. In some cases, we may have a legal obligation to use or keep your personal data.
- Our legitimate interests. We may process your personal data where it is necessary for our legitimate interests. For instance, we may rely on our legitimate interests to use your personal data in the following cases:
  - a) User authentication. Kudurru Stone needs to verify the user's identity and authenticate them in order to provide access to their Accounts.

- b) Customer support. We may use personal data to provide customer support to users who are experiencing issues with their Subscriptions or have questions about the Services.
- c) Measure interest in Service and improve user experience. We may collect data on how users are interacting with the Service, such as which features they use the most or which parts of the Service they find difficult to use. This information can be used to make improvements to the Service and enhance the user experience.
- d) Marketing and promotional communications. Kudurru Stone may use your personal data to send marketing emails or offers to Users who have opted in to receive them.
- e) Analytics and reporting. We may use your personal data to generate analytics and reports on user activity and usage patterns, which can be used to improve our Services and inform business decisions.
- f) Administrative purposes. We may use your personal information for our internal administrative purposes, such as accounting and record-keeping, data analysis, testing, research, statistical and survey purposes.
- g) Inform you of any changes to our Services, such as updates to our Terms of Service and Privacy Policy, or send you updates on other essential information related to the functioning of your Account or Subscriptions.
- h) Respond to Users' requests, comments, queries, and feedback. Kudurru Stone uses your personal data to respond to the requests you send us through the Services or Website or directly by email or other available means of communication.
- i) Resolve disputes or troubleshoot problems Users may incur while using our Services or accessing our Website.
- j) For security and fraud prevention, to ensure that our Website and Services are safe and secure and used in line with our Terms of Service.

## **5. Retention of your Personal Information**

5.1. All the personal data will be securely stored on our server, with only a limited number of our employees having access to them.

5.2. We ensure that we keep your personal data for only as long as necessary. The duration for which we need your personal data depends on the purpose for which we are using it, as outlined in this Privacy Policy. For instance, we may need to retain your data to address your inquiries about our Service and, therefore, may keep your personal data as long as you continue using our Services. Additionally, we may need to keep your personal data for accounting purposes, such as in cases where you have purchased a Subscription. If we no longer require your personal data, we will either delete it or make it anonymous by removing any details that can identify you. In cases

where we have sought your permission to process your personal data and have no other lawful grounds for such processing, and you withdraw your consent, we will delete your personal data.

## **6. How we share your Personal Information**

6.1. To facilitate some of our Services, it may be necessary to disclose your personal data to certain third parties that we rely on to assist us in operating the Website and making the Services available to you under the following circumstances:

6.1.1. We use external third-party service providers to help us operate our business and the Website, and provide you with the Services. Your data may be shared with these organizations that offer Services on our behalf. We may undertake this action to fulfill our contractual obligations to you, in our legitimate interests, or with your explicit consent. Examples, where we may share your data with service providers, are as follows:

- Online payments processors who process credit and debit card transactions on our behalf, such as Stripe;
- Software service providers, such as HubSpot, that assist us with customer support;
- Internet and cloud hosting services providers, such as Microsoft Azure;
- Service providers that assist us in analytics measurement and understanding users engagement with our Website and Service that help us improve our Services, such as Google Analytics;
- Cloud-based email delivery platform, such as SendGrid.

6.2. We do not sell your personal information to third parties. We do not share your personal information except for the purposes of providing our Services and only in the ways that are described in this Privacy Policy.

6.3. We may share your personal information as required by law: in response to lawful requests by public authorities, law enforcement agencies, courts, regulators, and government authorities, including to meet national security or law enforcement requirements, such as to comply with reporting requirements, a subpoena, or similar legal process; in connection with an investigation of fraud, intellectual property infringement, piracy, or other unlawful activity or as we believe reasonably necessary to protect or enforce our rights, protect your safety or the safety of others or for any legal action if required by law or regulatory obligation. If we possess your contact information, we will make reasonable efforts to inform you before disclosing your data unless it is prohibited by applicable law or if there are clear indications of unlawful activities associated with your use of our Services.

## **7. International data transfers**

7.1. Personal data we collect from you may be transferred to, stored, and processed in any country or territory where our service providers are based or have facilities. While other countries or territories may not have the same standards of data protection as those in your home country, we will continue to protect the personal data that we transfer in line with this Privacy Policy.

7.2. Whenever we transfer your personal data outside of the UK, we take steps to ensure that your data is protected. We do this by putting in place at least one of the following safeguards:

- 1) We will only transfer your personal data to countries that have been deemed to have an adequate level of protection for personal data.
- 2) Alternatively, we may use specific approved contracts that include Standard Contractual Clauses for the protection of personal data where appropriate. These contracts are used with our service providers that are based in countries outside the UK, including those based in the US. By using these contracts, your personal data will have the same level of protection as it would in the UK.

## **8. Cookies and similar technologies**

8.1. To make your use of the Website and Service comfortable, easy, and possible, we use cookies and other similar technologies to improve your user experience and the Website performance, remember your preferences, and enhance the Website's security.

8.2. When you visit our Website, small text files called cookies are automatically placed on your device. These files contain basic information about your internet activity and are stored by your internet browser. Examples of the information that cookies may contain include your device's IP address, browser type and version, operating system type and version, language preferences, the webpage you visited before coming to the Website and Services, the pages you view on the Website, and Services, the amount of time spent on those pages, the information you search for on the Website, access times and dates, and other similar statistics.

8.3. The data collected automatically through cookies is used solely for the purpose of identifying possible cases of misuse and for generating statistical information on the usage and traffic of the Website and Services. This statistical information is not combined in a manner that would identify any particular user of the system.

8.4. The cookies we use fall into the following categories:

1. Strictly Necessary

Necessary cookies help make the Website usable by enabling basic functions like page navigation and access to secure areas of the Website. The Website cannot function properly without these cookies.

2. Preferences

Preference cookies enable the Website to remember information that changes the way the Website behaves or looks, like your preferred language or the region that you are in.

### 3. Statistics

Statistics cookies help us to understand how users interact with the Website by collecting and reporting information anonymously.

### 4. Marketing

Marketing cookies are used to track the Website users across multiple devices and marketing channels. The intention is to display ads that are relevant and engaging for the individual user.

8.5. To provide you with control over your privacy settings, we offer a Cookie Consent Tool that allows you to adjust and customize your cookie preferences. You can find this tool by clicking on the "Cookie Consent" link at the bottom of each page of the Website and modifying your preferences through our cookie banner. Additionally, you can manage your cookies through your internet browser settings. You have the right to withdraw your consent to cookies at any time by clicking the "Cookie Consent" link, modifying your preferences, and saving your changes. In your internet browser settings, you can choose which cookies to accept and which to reject.

8.6. Please note that if you decline certain cookies, your access to certain functionality and areas of our Services may be limited or restricted.

8.7. We want to assure you that any information we collect through cookies is subject to this Privacy Policy, which is linked on every page of our Website.

## **9. UK Residents Privacy Protection Statement**

9.1. This Privacy Statement applies to Users based in the United Kingdom. This Statement supplements but not replaces this Privacy Policy. However, where our Privacy Policy conflicts with this Statement, the Statement will prevail for Users located in the United Kingdom.

9.2. You have certain rights regarding the personal information we hold about you:

- a) The right to request access to your personal information. You are entitled to receive a copy of the personal information we hold about you. Where applicable, you may also receive a machine-readable copy of your personal data.
- b) The right to request correction of your personal information if it is inaccurate.
- c) The right to request deletion of your personal information if:
  - your personal information is no longer necessary for the purposes for which we collected or processed them; or
  - you withdraw your consent if the processing of your personal information is based on consent and no other legal ground exists; or

- you object to the processing of your personal information, and we do not have an overriding legitimate ground for processing; or
  - your personal information is unlawfully processed; or
  - your personal information must be erased for compliance with a legal obligation.
- d) The right to object to the processing of your personal information. We will satisfy your request unless we have a compelling overriding legitimate interest for processing or we need to continue processing your personal data to establish, exercise or defend a legal claim.
- e) The right to restrict the processing of personal data if:
- the accuracy of your personal data is contested by you for the period in which we have to verify the accuracy of the personal data; or
  - the processing is unlawful and you oppose the erasure (deletion) of your personal data and request restriction; or
  - we no longer need your personal data for the purposes of the processing, but your personal data is required by you for legal claims; or
  - you have objected to the processing, for the period in which we have to verify overriding legitimate grounds.
- f) The right to withdraw your consent to use your personal data at any time where you have provided it earlier.

9.3. If you want to exercise any of these rights specified above, please contact us at [contactus@kudurrustone.com](mailto:contactus@kudurrustone.com). Please allow us 30 (thirty) calendar days to respond to your request.

9.4. To proceed with your request, we may require you to verify your identity. In the event that the proof of identity you provide contains information that does not match our records, we may request additional proof of identity from you.

9.5. If your request is complex or you have made numerous requests, it may take us longer to respond. We will notify you if we require more than 30 (thirty) days to provide a response. There is no fee for obtaining a copy of your personal data or exercising any of your other rights. However, we may charge a reasonable administrative fee for any additional copies you request.

## **10. Californian Residents Privacy Protection Act Notice**

10.1. This Notice is provided under the California Online Privacy Protection Act (CalOPPA). The rights described herein are not absolute, and we reserve all of our rights available under the law.

10.2. If you are a California resident, you may be entitled to additional rights regarding your personal information, namely:

- the right to know and access the personal information we have collected about you;

- the right to request deletion of your personal information, and
- the right to opt-out of the sale of your personal information, if applicable.

10.3. To exercise any of these rights, please contact us using the contact information provided at the end of this Privacy Policy. We will not discriminate against you for exercising any of your rights.

10.4. We may collect and share certain personal information with third parties, including service providers and other companies who assist us in providing the services to you. We do not sell your personal information to third parties.

10.5. Please note that we do not currently respond to “Do Not Track” signals from web browsers. We respect "do not track" signals sent by web browsers. As such, we do not currently alter our data collection and usage practices in response to "do not track" signals. However, we are committed to protecting your privacy and providing transparency about our data collection and usage practices. As such, we provide options for you to control how we use your data and offer mechanisms for you to exercise your rights under applicable data protection laws.

### **11. Third-party Links**

Our Website may, from time to time, contain links to and from other websites. If you follow a link to any such website, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### **12. Safeguard measures to protect your Personal Data**

We have taken necessary measures to safeguard your personal data against unauthorized processing, as well as accidental loss, damage, or destruction, through appropriate technical, administrative, and organizational measures. During the process of setting up a password for accessing certain parts of our Service, you are solely responsible for choosing a secure password and keeping it confidential. It is recommended that you avoid using the same password on other websites and services. Not disclosing your password to anyone, including our employees, is essential. However, it is important to note that sending any information, including personal data, over the Internet may not be entirely secure. Therefore, any personal data sent to our Website or through the Service is at your own risk as we cannot guarantee its security during transit.

### **13. Compromise of Personal Information**

13.1. We will promptly notify you if your personal information becomes compromised. We do not accept liability for any unintentional disclosure or disclosure that occurs due to a security breach of our systems or facilities.

13.2. In the event of a data breach, we are committed to complying with our legal obligations and ensuring that the privacy and security of our Users' personal data are protected. We have implemented appropriate technical and organizational measures to prevent data breaches from occurring, but in the unlikely event that a data breach does occur, we will take the following steps:

- a) Notification: We will promptly notify the appropriate data regulators if needed, and any affected individuals of the breach where it is likely to result in a risk to the rights and freedoms of individuals. We will also provide them with any relevant details of the breach and any measures taken to mitigate its possible adverse effects.
- b) Investigation: We will conduct a thorough investigation into the cause and extent of the breach, including identifying the categories of personal data affected and the individuals affected.
- c) Remediation: We will undertake necessary remedial measures to rectify any weaknesses and prevent future breaches. These measures may include an extensive review and update of our policies and procedures, the implementation of supplementary security measures, and offering training to our employees to enhance their knowledge of data protection and security best practices.
- d) Record-keeping: We will maintain a record of any data breaches, including the facts surrounding the breach, its effects, and the remedial action taken.

#### **14. Changes to our Privacy Policy**

14.1. At our discretion, we may modify this Privacy Policy or its terms regarding the Website and Services. In the event of any significant changes to the way we handle Personal data, we will notify you accordingly. The updated date at the top/bottom of this page will be revised when such modifications are made. Additionally, we may use other means, such as the contact information you provided, to inform you of any such changes.

14.2. Unless otherwise stated, any updated version of this Policy will be effective immediately upon its posting. By continuing to use the Website and Services after the effective date of the revised Privacy Policy, you consent to these changes. However, we will not use your Personal data in a manner that significantly differs from what was disclosed at the time of its collection without obtaining your consent.

#### **15. Contact Us**

Questions, comments, and requests regarding this Privacy Policy are welcomed and should be addressed to [contactus@kudurrustone.com](mailto:contactus@kudurrustone.com) or mailed to us at 1921 W Cedar Grove St, Meridian, Idaho, 83646, the United States of America.