# CFturbo, Inc. Privacy Policy

Effective date: May 28, 2019

## **Privacy protection**

We take the protection of your personal data very seriously. We treat your personal data confidentially and in accordance with the requirements of the EU General Data Protection Regulation and the EU-US and Swiss-US Privacy Shield Frameworks.

#### NOTICE:

CFturbo, Inc. collects information which you directly and voluntarily provide to us. If you visit our website, we may collect information that you provide to us when you communicate with any of our departments, such as customer service, or sign up to receive more information from us, such as when you request access to download our software. This information typically includes your name, email address, company, mailing address, job title, and phone number. This data will be treated confidentially and will not be disclosed to third parties.

You have the right to revoke your consent at any time with effect for the future. The stored personal data will be deleted if you revoke your consent to storage or if storage is not permitted for legal reasons. You may also choose to provide your email address to us if you would like to receive additional information about CFturbo and the products and services the company offers. If you use the registration form, your data will be stored for the purpose of processing your inquiry.

### **Third Parties**

CFturbo collects data through Google Analytics and the use of cookies. All data is collected anonymously, and we do not share analytics data with third parties. We handle personal data only if the user registers on our website to get download access.

## Automatic data storage

We use cookies to make our website more user-friendly, effective and secure. Furthermore, every access to this website is stored in log files of the web server. This data is anonymous and cannot be assigned to a specific person.

### **External services**

We use the services Maps and YouTube of Google, Inc. (USA). You can find information on the handling of user data under <a href="https://www.google.com/intl/en/policies/privacy/">https://www.google.com/intl/en/policies/privacy/</a>.

## Right to information access

Upon request, CFturbo, Inc. will grant individuals access to personal information that it holds about them. In addition, CFturbo, Inc. will take reasonable steps to permit individuals to correct, amend, or delete information that is demonstrated to be inaccurate or

incomplete. If you have any questions about data protection or your personal data, please do not hesitate to contact us.

# Recourse, Enforcement, and Liability

CFturbo, Inc complies with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from the European Union, the United Kingdom, and Switzerland to the United States in reliance on Privacy Shield. CFturbo, Inc has certified that it adheres to the Privacy Shield Principles with respect to such data. If there is any conflict between the policies in this privacy policy and data subject rights under the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <a href="https://www.privacyshield.gov/">https://www.privacyshield.gov/</a>

Pursuant to the Privacy Shield Frameworks, EU, UK, and Swiss individuals have the right to obtain our confirmation of whether we maintain personal information relating to you in the United States. Upon request, we will provide you with access to the personal information that we hold about you. You may also correct, amend, or delete the personal information we hold about you. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data transferred to the United States under Privacy Shield, should direct their query to <a href="mailto:info@cfturbo.com">info@cfturbo.com</a>. If requested to remove data, we will respond within a reasonable timeframe.

We will provide an individual opt-out choice, or opt-in for sensitive data, before we share your data with third parties other than our agents, or before we use it for a purpose other than which it was originally collected or subsequently authorized. To request to limit the use and disclosure of your personal information, please submit a written request to info@cfturbo.com.

In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

CFturbo, Inc's accountability for personal data that it receives in the United States under the Privacy Shield and subsequently transfers to a third party is described in the Privacy Shield Principles. In particular, CFturbo, Inc remains responsible and liable under the Privacy Shield Principles if third-party agents that it engages to process personal data on its behalf do so in a manner inconsistent with the Principles, unless CFturbo, Inc proves that it is not responsible for the event giving rise to the damage.

CFturbo, Inc. is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

In addition, CFturbo, Inc. is required to disclose personal information in response to lawful requests by public authorities, including to meet national security of law enforcement requirements.

In compliance with the Privacy Shield Principles, CFturbo, Inc commits to resolve complaints about your privacy and our collection or use of your personal information transferred to the United States pursuant to Privacy Shield. EU, UK, or Swiss individuals with Privacy Shield inquiries or complaints should first contact CFturbo, Inc by email at <a href="mailto:info@cfturbo.com">info@cfturbo.com</a>.

CFturbo, Inc has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <a href="http://www.bbb.org/EU-privacy-shield/for-eu-consumers">http://www.bbb.org/EU-privacy-shield/for-eu-consumers</a> for more information and to file a complaint. This service is provided free of charge to you.

If your Privacy Shield complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See Privacy Shield Annex 1 at <a href="https://www.privacyshield.gov/article?id=ANNEX-I-introduction">https://www.privacyshield.gov/article?id=ANNEX-I-introduction</a>.

# **Changes to this Privacy Shield Policy**

This Privacy Shield Policy may be amended from time to time consistent with the requirements of the Privacy Shield. Appropriate notice regarding such amendments will be given.

#### **CONTACT INFORMATION**

Questions or comments regarding this policy should be submitted to the CFturbo, Inc. by mail to:

CFturbo, Inc., Inc. NEWLAB, 19 Morris Ave.

Bld.128, Brooklyn Navy Yard

Brooklyn, NY 11205, USA

Or by e-mail to info@cfturbo.com.