

CRUATECH

Integrating people and technology

PRIVACY STATEMENT

- 1. INTRODUCTION-** This privacy notice provides you with details of how we collect and process your personal data through your use of our site:
<https://www.cruatech.com/>

By providing us with your data, you warrant to us that you are over 13 years of age.

Cruatech is the data controller, and we are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice).

Contact Details

Our full details are:

Full name of legal entity: Cruatech Ltd.

Person in Charge of Data Protection: Avimukta Malakar

Email address: Avimukta.malakar@cruatech.com

Registered business address: Innovation Campus, 11 Old Finglas Rd, Glasnevin, Dublin, D11 KXN4

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at: sales@cruatech.com

2. WHAT DATA DO WE COLLECT ABOUT YOU, FOR WHAT PURPOSE AND ON WHAT GROUND WE PROCESS IT

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We may process the following categories of personal data about you:

- **Communication Data** that includes any communication that you send to us whether that be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance, or defence of legal claims. Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.
- **Customer Data** that includes data relating to any purchases of goods and/or services such as your name, title, billing address, delivery address email address, phone number, contact details, purchase details and your card details. We process this data to supply the goods and/or services you have purchased and to keep records of such transactions. Our lawful ground

for this processing is the performance of a contract between you and us and/or taking steps at your **request to enter such a contract**.

- **User Data** that includes data about how you use our website and any online services together with any data that you post for publication on our website or through other online services. We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain back-ups of our website and/or databases and to enable publication and administration of our website, other online services, and business. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business.
- **Technical Data** that includes data about your use of our website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is from our analytics tracking system. We process this data to analyse your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business and to grow our business and to decide our marketing strategy. Please also review the new changes to User Data under the GA4 category listed below.
- **Marketing Data** that includes data about your preferences in receiving marketing from us and our third parties and your communication preferences. We process this data to enable you to partake in our promotions such as competitions, prize draws and free give-aways, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising. Our lawful ground for this processing is our legitimate interests which in this case are to study how customers use our products/services, to develop them, to grow our business and to decide our marketing strategy. Please also review the new changes to User Data under the GA4 category listed below.
- We may use Customer Data, User Data, Technical Data and Marketing Data to deliver relevant website content and advertisements to you (including Facebook adverts or other display advertisements) and to measure or understand the effectiveness of the advertising we serve you. Our lawful ground for this

processing is legitimate interests which is to grow our business. We may also use such data to send other marketing communications to you. Our lawful ground for this processing is either consent or legitimate interests (namely to grow our business).

Sensitive Data

Cruatech does not collect sensitive data.

OR

Cruatech does collect sensitive data. We collect it for the following purposes:

(Sensitive data is medical information, biometric data, sexual orientation, trade union membership, political opinions, criminal history etc)

3. HOW WE COLLECT YOUR PERSONAL DATA

We may collect data about you by you providing the data directly to us (for example by filling in forms on our site or by sending us emails). We may automatically collect certain data from you as you use our website by using cookies and similar technologies. Please see our cookie policy for more details about this

We may receive data from third parties such as analytics providers such as Google based outside the EU, advertising networks such as Facebook based outside the EU, such as search information providers such as Google based outside the EU, providers of technical, payment and delivery services, such as data brokers or aggregators.

As per Google, GA4 will collect the below features:

- How they collect both website and app data to understand the customer journey better.
- Uses events instead of session-based data.
- Includes privacy controls such as cookie less measurement and behavioural and conversion modelling.
- Predictive capabilities offer guidance without complex models.
- Direct integrations to media platforms help drive actions.
- IP anonymization is always enabled for GA4 properties & no manual action is required.
- Google Analytics 4 uses IP only to determine where to record other personal data of users, and then it is deleted.

GA4 will no longer monitor sessions and pageviews but instead monitor events and parameters.

Events are divided by:

Automatically collected events:

The following parameters are collected by default with every event, including custom events:

– language.

- page location
- page referrer
- page title
- screen resolution

Enhanced Measurement events – These events allow measuring interactions with the website's content by enabling options (events) in the Google Analytics interface. These events include scrolls, outbound clicks, site search, and video engagement.

Recommended Events – These are events recommended by Google to help measure additional features and behavior and generate more detailed reports.

Custom Events – Events and parameters that can be created and implemented based on website requirements.

How Long does GA4 retain data:

While for Universal Analytics user-level and event-level data properties could have an indefinite duration, user-level data can be retained for a maximum of 14 months for Google Analytics 4 properties.

For more information on how Google and GA4 collects your data please review the following link: <https://policies.google.com/terms?hl=en-US>

4. MARKETING COMMUNICATIONS

Our lawful ground of processing your personal data to send you marketing communications is either your consent or our legitimate interests (namely to grow our business).

You can ask us or third parties to stop sending you marketing messages at any time (by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences) OR (by following the opt-out links on any marketing message sent to you or) OR by emailing us at sales@cruatech.com at any time.

If you opt out of receiving marketing communications this opt-out does not apply to personal data provided because of other transactions, such as purchases, warranty registrations etc.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below:

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors, and insurers.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to

process your personal data for specified purposes and in accordance with our instructions.

6. TRANSFERRING OF PERSONAL DATA OUTSIDE EEA

Our hosting is carried out by Cruatech who are based in Dublin, Ireland. Our website is held on Weebly platform with servers in the US Location.

7. DATA SECURITY

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions, and they must keep it confidential. We also only allow access to your personal data to those listed above who need to know such data. They will only process your personal data on our instructions, and they must keep it confidential.

We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

8. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

When deciding what the correct time is to keep the data for, we look at its amount, nature and sensitivity, potential risk of harm from unauthorized use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for up 6 years from the date of termination of employment. Once these time periods have elapsed all relevant material will be safely and securely destroyed unless we are required to keep them for a legal reason i.e., written allegations/ complaints may be kept indefinitely.

In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

You can see more about these rights at: <https://www.dataprotection.ie/>

If you wish to exercise any of the rights set out above, please email sales@cruatech.com You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive or refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We will endeavour to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office <https://www.dataprotection.ie/>. We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

10. THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.