

ScroogeFrog Privacy Policy

Effective Date:

Scrooge Frog OÜ (“ScroogeFrog”, “we,” “us,” or “our”) values your privacy and is committed to protecting your personal data. This Privacy Policy explains how we collect, use, share, and protect information when you visit our Website, use our Services on your own or on behalf of the company, or otherwise interact with us.

We have designed this Privacy Policy to be simple and easy to understand. Please refer to our Cookie Policy to learn more about how we use cookies and other similar technologies and the ScroogeFrog Data Processing Agreement (DPA) on processing our Customers’ end users’ personal data.

Before providing your consent for processing your personal data or submitting any personal information through a form on our Website, we kindly ask you to carefully review this Privacy Policy to ensure you fully understand the terms and conditions of our cooperation.

This Privacy Policy applies to you visiting our Website, and your use of the ScroogeFrog Services personally or on behalf of the company, as defined in our Terms and Conditions.

By accessing or using our Website and Services, you confirm that you have read and understood this Privacy Policy.

1. Who We Are

This Privacy Policy applies to Scrooge Frog OÜ, with the registered address at Ilmatsalu tn 36-24 Tartu 50408, Estonia, and its affiliated subsidiaries.

How to contact us: antifraud@scroogefrog.com or by post to Ilmatsalu tn 36-24 Tartu 50408, Estonia.

2. Information We Collect

We collect personal data to provide, enhance, and secure our Website and Services.

2.1. Information You Provide to Us:

You may share information directly with us, such as:

- Account Information: Name, email address, phone number, skype ID, and other details provided during registration or communication.
- Billing Information: Payment details necessary for the Services transactions.

- Support Requests: Information you provide when contacting us for help or feedback.
- Other information freely submitted through the Website forms or Services.

2.2. **Automatically Collected Information**

When you use our Website, we may automatically collect:

- Device Information: IP address, browser type, operating system, and unique identifiers.
- Usage Data: Information about how you interact with our website, including pages visited, time spent, and clicks.
- Cookies and Similar Technologies: Information collected using cookies, pixels, or other technologies. See our Cookie Policy.

2.3. **Information from Third Parties**

We may receive data from third parties, such as analytics providers, payment processors, or marketing platforms, to help us improve our Services.

3. **Children and Sensitive Data**

3.1. **Children Data**

Our Website or Services are not intended for individuals under the age of 16, and we do not knowingly collect personal data from children. If we discover that our Website visitor or registered Customer is under 16, we will promptly cease processing their personal data and ensure it is deleted from our records. Should we inadvertently collect data from a child under 16, we will take immediate steps to remove the information. If you believe that we may have collected data from a child, please contact us to address the issue.

3.2. **Sensitive Data**

We do not knowingly collect, process, or store sensitive categories of personal data, such as information related to health, religion, or political beliefs.

4. **Lawful Basis and Purposes for Processing Personal Data**

4.1. We process your personal data based on one or more of the following lawful bases:

- *Performance of a Contract.* To provide our Services and fulfill our obligations under our agreement with you.
- *Legal Obligations.* To comply with applicable laws and regulations.
- *Legitimate Interests.* To improve our Services, ensure security, and provide you with relevant information (e.g., Services updates or customer support).

- *Consent.* Where required by law, we obtain your explicit consent for specific data processing activities.

4.2. At ScroogeFrog, we process your personal data to deliver a seamless and secure experience with our Services. Below, we provide a detailed explanation of the purposes for which we collect, use, and store your data:

- *Account Management and Service Access*

We process your personal data to create, manage, and maintain your account, ensuring you can access and utilize our Services effectively. This includes verifying your identity and managing account-related preferences.

- *Administrative and Transactional Communications*

We use your data to send essential communications, such as Services updates, transaction confirmations, and changes to our terms, policies, or Services. These communications ensure you stay informed and are critical for maintaining Website or Services continuity.

- *Fraud Detection and Prevention*

Your data helps us identify, investigate, and prevent fraudulent or unauthorized activities on our Website or in connection with our Services, ensuring the security of your account and our Services.

- *Website Functionality and User Experience Improvement*

We analyze how you interact with our Website to improve its functionality, usability, and overall user experience, tailoring our Services to meet your needs better.

- *Compliance with Legal and Regulatory Obligations*

ScroogeFrog processes personal data as required to meet applicable laws, regulations, and court orders. This includes cooperating with authorities or fulfilling contractual obligations.

- *Marketing and Promotional Activities*

With your consent, we may process your data to inform you about updates, promotions, or new services we believe may interest you. These communications will respect your preferences, and you can opt-out at any time.

- *Behavioral and Social Media Marketing*

We may analyze your interaction with our Website and Services to tailor advertisements and marketing content to your interests. Additionally, we may collaborate with social media platforms to deliver personalized marketing campaigns.

- *Analytics and Service Development*

Your data supports us in analyzing trends, monitoring the effectiveness of our Services, and improving our offerings. By leveraging analytics, we can enhance our Services and introduce new features that benefit our users.

5. How We Share Your Information

We do not sell your personal data. However, we may share your information in the following circumstances:

5.1. *Third-Party Service Providers*

We may engage third-party service providers for different types of services, i.e. hosting, analytics, advertising, payment processing, or customer support. These providers process your data on our behalf under strict confidentiality data protection agreements. Categories of Third-Party Service providers are:

- *Analytics services*
- *Social network platforms and search engines*
- *Customer communication solutions*
- *Services to manage emails and send out push notifications*
- *Payment Services Providers*
- *Search engine optimization and marketing tools*
- *Tax and accounting compliance service providers*

5.2. *Legal Compliance*

We may disclose data to comply with legal requirements, such as subpoenas or regulatory requests.

5.3. *Business Transfers*

In the event of a merger, acquisition, or sale, personal data may be transferred to the acquiring entity.

5.4. *Company Group*

We may disclose your Personal Data within our affiliated companies strictly on a “need-to-know” basis.

5.5. *Aggregated or Anonymized Data*

We may share anonymized data that cannot identify you personally for statistical purposes or business insights.

6. Cookies and Tracking Technologies

We use cookies and similar technologies to enhance your browsing experience, improve our Website and Services, and deliver relevant content. For detailed information, please see our Cookie Policy.

7. International Data Transfers

If we transfer personal data from the European Economic Area (EEA) to a location outside the EEA, we ensure compliance with applicable data protection laws. Such transfers are governed by appropriate safeguards, including:

7.1. *Standard Contractual Clauses (SCCs).*

Approved by the European Commission under the GDPR to ensure your personal data is protected regardless of its destination.

7.2. *Adequacy Decisions.*

Transfers may occur to countries deemed by the European Commission to provide an adequate level of data protection under Article 45 of the GDPR.

7.3. *Additional Measures.* In some cases, supplementary technical, organizational, and contractual measures are applied to provide enhanced protection.

At ScroogeFrog, we implement these safeguards to maintain the security and confidentiality of your data throughout its transfer process.

8. Your Rights

In compliance with global privacy laws, particularly the European General Data Protection Regulation (GDPR), ScroogeFrog recognizes and respects the following rights for individuals who interact with us. These rights include, but are not limited to:

8.1. *Right to Access.*

You have the right to request information about whether and which personal data is processed by us.

8.2. *Right to Rectification.*

You may demand the correction or amendment of any inaccurate or incomplete personal data.

8.3. *Right to Erasure ("Right to Be Forgotten").*

You may request that your personal data be deleted, subject to any legal or contractual obligations requiring its retention.

8.4. *Right to Restriction of Processing.*

You can request the restriction of processing under certain circumstances, such as when the accuracy of your data is contested.

8.5. *Right to Withdraw Consent.*

If you have provided consent for the processing of your personal data, you may withdraw it fully or partially at any time, with effect for the future.

8.6. *Right to Data Portability.*

You are entitled to receive your personal data in a commonly used, structured, and machine-readable format, and, where technically feasible, have it transferred to another data controller upon your request.

8.7. Right to Object.

You can object to the processing of your personal data, particularly for direct marketing purposes.

8.8. Right to Lodge a Complaint.

If you believe that your personal data has been processed in violation of applicable laws, you have the right to file a complaint with the appropriate data protection authority.

For residents of the European Territories (European Economic Area (EEA), European Free Trade Area (EFTA), Switzerland, and the United Kingdom), ScroogeFrog adheres to the GDPR and other relevant regulations. Even post-Brexit, the United Kingdom is considered within the scope of European Territories for data protection purposes.

The controller of your data within these territories is Scrooge Frog OÜ.

For questions, concerns, or to exercise any of these rights, please contact us at antifraud@scroogefroge.com. We are committed to responding promptly and assisting you in exercising your rights.

9. Data Security

We implement robust technical and organizational measures, including encryption and access controls, to safeguard your personal data against unauthorized access, alteration, or disclosure.

10. Data Retention

At ScroogeFrog, we retain your personal data only as long as necessary to fulfill the purposes for which it was collected and processed, in compliance with applicable legal, regulatory, and business requirements.

10.1. General Retention Period.

Your personal data will be stored as long as your account remains active. If your account has been inactive for more than two years, it will be considered expired. In such cases, or if you choose to delete your account, we will remove your personal data from our active systems and servers within 90 days or sooner.

10.2. AI Data Processing.

Personal data processed by our AI-powered tools is always anonymized, ensuring that it cannot be traced back to any individual. We process such anonymized data solely for

training and improvement purposes and retain it only for as long as necessary to achieve these goals.

10.3. Conflict Situations.

In cases of ongoing disputes or conflict, we may retain your personal data for longer periods to establish, exercise, or defend legal claims. Once the conflict is resolved, any retained personal data will be deleted if the standard retention period has expired.

10.4. Legal and Regulatory Compliance.

We may retain some of your personal data for longer periods to comply with applicable legal, regulatory, tax, accounting, or other obligations.

10.5. Marketing Communications.

If you have subscribed to our mailing list or newsletter, your personal data will be stored until you indicate that you no longer wish to receive our communications. You can unsubscribe at any time by clicking the link provided in our emails.

11. California Privacy Rights

11.1. If you are a California resident, you are entitled to specific rights regarding your personal data under the California Consumer Privacy Act of 2018 (CCPA). These include:

- *Right to Know: The right to know about the categories and specific pieces of personal data we have collected about you and to request a copy of this data.*
- *Right to Correction: The right to request corrections to any inaccurate personal data we hold about you.*
- *Right to Deletion: The right to request the deletion of personal data we have collected, subject to certain exceptions under the law.*
- *Right to Opt-Out: The right to opt out of the sale of your personal data, including data shared for targeted advertising purposes.*

11.2. Verification Process

To protect your privacy, we may ask you or your authorized agent to provide certain information to verify your identity and authorization before processing your request. The details we request will depend on your prior interactions with us.

11.3. For information about the personal data we collect, how it is collected, and the purposes for its collection, please refer to Sections 2 and 4 of this Privacy Policy. For details about categories of service providers who have access to your data, see Section 5.

11.4. We are committed to treating you fairly and will not discriminate against you for exercising your rights. To exercise these rights, please email us at antifraud@scroogefrog.com.

12. "Do Not Track" Requests

12.1. ScroogeFrog does not share personal data with third parties for their direct marketing purposes.

12.2. Additionally, our Services do not currently support "Do Not Track" (DNT) signals sent by web browsers. This is because there is no universally accepted standard for DNT implementation or interpretation, and our platform operates in compliance with other privacy mechanisms, such as user consent and opt-out preferences as defined under applicable privacy laws.

13. End User Data Processing

If you use ScroogeFrog's Services involving the personal data of your end users, our role as a data processor or sub-processor is governed by our Data Processing Agreement (DPA). We process end-user data strictly as instructed by you and in compliance with data protection laws.

14. Changes to This Privacy Policy

We may update this Privacy Policy to reflect changes in our practices or legal requirements. Any updates will be posted on this page, and significant changes will be communicated directly to you. Please review this Privacy Policy periodically.