Privacy Policy Q&A Template

| Section | Shopify | Enterprise |
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| Preamble | The Privacy Policy is a statement of your due diligence in reference to the legal regulations on protecting the personal information of your customers and users. In order for the Policy to be valid, you will need to ensure you have the processes in place to back these statements. For example, if your company chooses to resell an individual’s personal information, you cannot make claims in this policy that you do not.  Fill out the following questions to generate a custom Privacy Policy that suits your business and your customers. | |
| Disclaimer | *Disclaimer: Enzuzo Inc is not a law firm and does not engage in the practice of law. This policy template is intended as a guideline only and does not substitute professional legal advice.* | |
| Company Name (CN) | \*For the Privacy Policy, we require the legal name of your business. We have your business listed as [company name]. Is this the legal name? [check one]   1. Yes. 2. No. (Ask for legal name) | \*What is the legal name for the business?   * + Free form entry |
| DBA | Does your business use a different name than the business’s legal name? (For example, Meta Platforms, Inc. v. Meta)  1. If yes, create a separate category for DBA | Does your business use a different name than the business’s legal name? (For example, Meta Platforms, Inc. v. Meta)  1. If yes, create a separate category for DBA |
| **Business Type** | **Select your business type from the following**:   * Website * SaaS * Mobile Application * E-Commerce | **Select your business type from the following**:   * Website * SaaS * Mobile Application * E-Commerce |
| Company Address (CA) | \*We have your address listed as [company address]. Can this address be publicly shared? [check one]   1. Yes, publish the address. 2. No, use another address (show text field). 3. No, don’t share my address. | a\* What is the mailing address for the company?   * + Free form entry   b\*Can this address be publicly shared? [check one]   * + Option: Yes, No. If No, ask for an alternative address if any. |
| Location Type (LT) | Location type of company [check all that apply]   1. *Retail or Storefront* 2. *Private Office* 3. *Shared Office* 4. *Home*   If available, what is the URL of your Website that lists company locations?   * + Free form entry | |
| Contact Methods (CM) | How can a customer reach you for additional privacy questions?:   * + Options: [checkbox + free form entry block for each checked - form is default]     1. Data Request Form on Privacy Policy Page     2. Email address     3. Phone number     4. Name of Privacy Officer or Contact | |
| Policy Application (PA) | This policy will apply to your website. Would you also like this policy to apply to your communication via email, newsletter, text, or phone? [check one]   * + Option: Yes, No | |
| Office Regions (OR) | \*In what regions do you have company offices? [check all that apply]   * + Options:     1. *Canada*     2. *United States*     3. *European Union*     4. *United Kingdom*     5. *Brazil*     6. *Other*     7. *Central America*     8. *South America*     9. *Africa*     10. *Asia*     11. *Oceania*   + *[Register the regulations - If Canada then PIPEDA, if EU then GDPR, if Brazil then LGPD]* | \*In what regions do you have company offices? [check all that apply]   * + Options:     1. *Canada*     2. *United States*     3. *European Union*     4. *United Kingdom*     5. *Brazil*     6. *Other*     7. *Central America*     8. *South America*     9. *Africa*     10. *Asia*     11. *Oceania*   + *[Register the regulations - If Canada then PIPEDA, if EU then GDPR, if Brazil then LGPD]* |
| Customer Regions (CR) | \*In what regions do you have customers? [check all that apply]   * + Same options as #OR   + *[Register the regulations - If Canada then PIPEDA, if EU then GDPR, if Brazil then LGPD, if California then CCPA/CPRA, if Colorado then CPA, if Utah then UCPA, if Virginia then VCDPA, if Connecticut then CTDPA* | \*In what regions do you have customers? [check all that apply]   * + Same options as #OR   + *[Register the regulations - If Canada then PIPEDA, if EU then GDPR, if Brazil then LGPD, if California then CCPA/CPRA. if Colorado then CPA, if Utah then UCPA, if Virginia then VCDPA, if Connecticut then CTDPA* |
| Data Transfers | [If CR = iii (EU)]  Special precautions must be taken to comply with the GDPR if you process personal data of data subjects in the EU or engage in processing activities related to (1) offering goods or services or (2) monitoring data subject behavior that take place in the EU.  Which of the following applies to Personal Data you process from your European Customers? [check all that apply]   1. We do not process personal data of EU customers or engage in processing activities in the EU 2. We process personal data of EU customers or engage in processing activities in the EU but we only transfer personal data within the EU 3. We only transfer EU customer data in locations considered adequate to the EU (such as Andorra, Argentina, Canada, Faroe Islands, Guernsey, Israel, Isle of Man, Japan, Jersey, New Zealand, Republic of Korea, Switzerland, the UK, and Uruguay) 4. We transfer EU customer data within the US but only with services that have Standard Contractual Clauses 5. We are unsure where EU data is kept | |
| Privacy Shield | Is your business certified under the EU-U.S. Privacy Shield Framework? | |
| Cookies (CK) | \*How does your website use cookies? [check all that apply]  a. Not at all  b. For use with our web application  c. To remember user preferences  d. To personalize content  e. Analyze traffic  f. To personalize ads from third parties (that appear on your website)  g. Share information with third party advertisers and partners (not from their ads)  h. We allow third parties to place cookies or similar tools on our site (not managed by you) | |
| Personal Data (PD) | \*What personal data do you collect? [check all that apply]   * + Options:     1. *Name (first and last)*     2. *Email address*     3. *Phone number*     4. *Shipping address*     5. *Billing address*     6. *Demographic Data including age, gender*     7. *Financial Information including credit card numbers*     8. *Purchase Information specifically if personalized or unique*     9. *Mobile device specific identifiers such as make and model, IMEI and phone number*     10. *Location Data*     11. *Work related information such as your occupation, or employment details*     12. *Account registration information, such as username and password.*     13. *Feedback, such as customer support or product reviews*     14. *Social media*     15. *Product information, such as serial number, product registration, licensing information*     16. *Content, such as posts, comments, audio, or documents*     17. *Other* [free form entry] | |
| Sensitive Personal Data (SPD) | \*Some data is considered “sensitive personal data” and should only be collected if absolutely required and with explicit consent from the individual. Do you collect any of the following?   * + Options:     1. Data around an individual’s religious beliefs, political opinions, philosophical beliefs, union membership, citizenship or citizenship status?     2. Information about an individual’s racial or ethnic background?     3. Medical information, genetic data, or biometric identifiers?     4. Data around an individual’s sex life or sexual orientation?     5. Financial data, including an individual’s account log-in, debit card or credit card number with corresponding security or access code, password, or credentials allowing access to an account?     6. Government identifiers, including social security number, driver’s license, state identification card, or password number?     7. Private communications data (mail, email, or text messages), unless you are the intended recipient of such communications?     8. Criminal history?     9. Precise geolocation data?     10. Data collected from a known child? | |
| Usage Information (UI) | Do you collect any usage information? [check all that apply]   * + Options:     1. *Login information*     2. *Device IDs*     3. *IP Address*     4. *Time stamps*     5. *Authentication records*     6. *Location information*     7. *Individual Products viewed*     8. *Web terms or searches that led you to the site*     9. *Time zone*     10. *Other operational data.* | |
| Business Purpose (BP) | \*Why do you collect this information? [check all that apply, at least 1]   * + Options:     1. *Providing our product or service* (To fulfill orders including electronic and non-electronic shipment)     2. *Building a Safe and Secure Environment (*To Verify or authenticate a user’s identity; and Investigate and prevent security incidents such as breaches, attacks and hacks.)     3. *Providing, Developing, and Improving our Products and Services* (To deliver, maintain, debug and improve our products and services. Enable users to access services and set up accounts)     4. *Provide you with technical and customer support.*     5. *Organize and Deliver Advertising and Marketing*     6. *For research and development.* (To optimize our products and features and incorporate feedback into our improvements).     7. *To communicate with you about the Products and Services.* (To confirm of purchases, remind of subscription terms, respond to inquiries, and send you periodic updates).     8. Other [free form entry] | |
| Google Analytics (GA) | \*Do you use Google Analytics on your site?   * + Options: Yes, No | |
| Remarketing (RE) | \*Do you use remarketing? (When you track people who have visited your site and show them ads for your products elsewhere)   * + Options: Yes, No | |
| Minimum Age (MA) | \*What is the minimum age of individuals that can purchase your product/service?   * + Options:     1. no minimum age     2. 13 years     3. 16 years     4. 18 years     5. 19 years     6. 21 years | |

| Section | Shopify | Enterprise |
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| Introduction | At [company name], d/b/a [alt company name](“us”, “we”, “our” or the “Company”) we value your privacy and the importance of safeguarding your data. This Privacy Policy (the "Policy") describes our privacy practices for the activities set out below. As per your rights, we inform you how we collect, store, access, and otherwise process information relating to individuals. In this Policy, personal data (“Personal Data”) refers to any information that on its own, or in combination with other available information, can identify an individual.    [If answer #LT YES – URL for locations]  The office locations of where [company name] Inc. can be found [Here] <hyperlink answer #LT>  [end #LT]  We are committed to protecting your privacy in accordance with the highest level of privacy regulation. As such, we follow the obligations under the below regulations:   * [If PIPEDA] Canada's Personal Information Protection and Electronic Documents Act (PIPEA) and the applicable provincial legislations [end] * [If GDPR]the EU's General Protection Data Regulation (GDPR) [end] * [If LGPD]Brazil’s Data Protection Legislation (LGDP)[end] * [If CCPA]California's Consumer Protection Act (CCPA) and California Online Privacy Protection Act (CalOPPA) * [If POPIA] South Africa’s Protection of Personal Information Act [end] | |
|  | Scope This policy applies to the [company name] websites and domains.  This Policy does not apply to third-party applications, websites, products, services or platforms that may be accessed through (non [company name] ) links that we may provide to you. These sites are owned and operated independently from us, and they have their own separate privacy and data collection practices. Any Personal Data that you provide to these websites will be governed by the third-party’s own privacy policy. We cannot accept liability for the actions or policies of these independent sites, and we are not responsible for the content or privacy practices of such sites. | Scope This policy applies to the [company name] websites, domains, applications, services, and products.  This Policy does not apply to third-party applications, websites, products, services or platforms that may be accessed through (non [company name] ) links that we may provide to you. These sites are owned and operated independently from us, and they have their own separate privacy and data collection practices. Any Personal Data that you provide to these websites will be governed by the third-party’s own privacy policy. We cannot accept liability for the actions or policies of these independent sites, and we are not responsible for the content or privacy practices of such sites. |
|  | **Processing Activities**  This Policy applies when you interact with us by doing any of the following:   * Make use of our application and services as an authorized user * Visit any of our websites that link to this Privacy Statement   [if answer #PA YES]   * Receive any communication from us including newsletters, emails, calls, or texts   [end #PA] | |
| Personal Data We Collect | What Personal Data We Collect When you make a purchase, or attempt to make a purchase, we collect the following types of Personal Data:  This includes:   * *Account Information* such as your name, email address, and password * *Payment Information* such as your billing address, phone number, credit card, debit card or other payment method * *[if vi] Demographic Data* including age, gender * *[if vii] Financial Information* including credit card numbers * *[if viii] Purchase Information* specifically if personalized or unique * *[if ix] Mobile device specific identifiers* such as make and model, IMEI and phone number * *[if x] Location Data* * *[if xi] Work related information* such as your occupation, employment details * *[if xvii insert text for Other]*   [end #PD]  When you use our products and/or features, we collect the following types of Personal Data:   * *Account Information* such as your name, email address, and password * *Payment Information* such as your billing address, phone number, credit card, debit card or other payment method * *[if vi] Demographic Data* including age, gender * *[if vii] Financial Information* including credit card numbers * *[if viii] Purchase Information* specifically if personalized or unique * *[if ix] Mobile device specific identifiers* such as make and model, IMEI and phone number * *[if x] Location Data* * *[if xi] Work related information* such as your occupation, employment details * *[if xiii] Feedback, such as customer support or product reviews* * *[if xiv] Social Media Information* * *[if xv] Product information, such as serial number, product registration, licensing information* * *[if xvi] Content, such as posts, comments, audio, or documents* * *[if xvii insert text for Other]*   [end #PD]  [If answer #SPD is YES]  We also collect the following *Sensitive Personal Data*. When collecting this data, we will ensure to get your explicit consent:   * *[if i]* Data around your religious beliefs, political opinions, philosophical beliefs, union membership, citizenship,\* citizenship status\*. or immigration status#. * *[if ii]* Information about your racial and/or ethnic background. * *[if iii]* Medical information including genetic data, biometric identifiers, or mental or physical health diagnosis\*. * *[if iv]* Data around your sex life or sexual orientation. * *[if x] Government Identifiers* such as driver’s license numbers, SSN, passport numbers * [If ix] Precise geolocation data.# * *[If x]* Data from a known child.\*   [Consent required for additional data marked with \* under CPA. Consent required for additional data marked with both \* and # under VCDPA and CTDPA].  [end #SPD]  How We Collect Your Personal Data  We collect Personal Data from the following sources:  **From You.** You may give us your Account Information, Payment Information, Financial Information, Demographic Data, Purchase Information, Content, Feedback, Product Information, by filling in forms, using our products or services, entering information online or by corresponding with us by post, phone, email, telephone or otherwise. This includes Personal Data you provide, for example, when you:   * Create an account or purchase products on our website; * Use our products or services; * Create content through our products or services; * Express interest in our products or services; * Downloading software and/or our mobile application; * Subscribe to our newsletter; * Complete a voluntary market research survey; * Contact us with an inquiry or to report a problem (by phone, email, social media, or messaging service); * When you log in to our website via social media;   **Automated technologies or interactions:** As you interact with our website, we may automatically collect the following types of data (all as described above): Device Dataabout your equipment, Usage Data about your browsing actions and patterns, and Contact Data where tasks carried out via our website remain uncompleted, such as incomplete orders or abandoned baskets. We collect this data by using cookies, server logs and other similar technologies. Please see our Cookie section (below) for further details.  **Third parties:** We may receive Personal Data about you from various third parties, including:   * Account Information and Payment Information from another individual when they purchase a gift for you on our website; * Device and Usage Data from third parties, including analytics providers such as Google; * Account Information and Payment Data from social media platforms when you log in to our website using such social media platforms; * Content from communication services, including email providers and social networks, when you give us permission to access your data on such third-party services or networks; * Account Information and Payment Data from third parties, including organizations (such as law enforcement agencies), associations and groups, who share data for the purposes of fraud prevention and detection and credit risk reduction; and * Account Information, Payment Data, and Financial Data from providers of technical, payment and delivery services.   If you provide us, or our service providers, with any Personal Data relating to other individuals, you represent that you have the authority to do so and acknowledge that it will be used in accordance with this Policy. If you believe that your Personal Data has been provided to us improperly, or to otherwise exercise your rights relating to your Personal Data, please contact us by using the information set out in the “Contacting us” section below. | |
| Device and Usage Data When you visit a [company name] website and/or mobile application, we automatically collect and store information about your visit using browser cookies (files which are sent by us to your computer), or similar technology. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. The Help Feature on most browsers will provide information on how to accept cookies, disable cookies or to notify you when receiving a new cookie. If you do not accept cookies, you may not be able to use some features of our Service and we recommend that you leave them turned on.  [insert all applicable answers from answer #UI – devices and usage]  We also process information when you use our services and products. This information may include:   * + *[if i] Login information*   + *[if ii] Device IDs*   + *[if iii] IP Address*   + *[if iv] Time stamps*   + *[if v] Authentication records*   + *[if vi] Location information*   + *[if vii] Individual Products you view*   + *[if viii] Web terms or searches that led you to the site*   + *[if ix] Time zone*   + *[if x] Other operational data.*   [End #UI] | |
| Data we collect from third parties We may receive your Personal Data from third parties such as companies subscribing to [company name] services, partners and other sources. This Personal Data is not collected by us but by a third party and is subject to the relevant third party’s own separate privacy and data collection policies. We do not have any control or input on how your Personal Data is handled by third parties. As always, you have the right to review and rectify this information. If you have any questions you should first contact the relevant third party for further information about your Personal Data. Where that third party is unresponsive to your rights, you may contact the Data Protection Officer at [company name]. (contact details below) and we can assist you.  Our websites and services may contain links to other websites, applications and services maintained by third parties. The information practices of such other services, or of social media networks that host our branded social media pages, are governed by third parties’ privacy statements, which you should review to better understand those third parties’ privacy practices. | |
| Purpose and Legal Basis for the Processing of Personal Data We collect and use your Personal Data with your consent to provide, maintain, and develop our products and services and understand how to improve them.  These purposes include:  [insert all applicable answers from answer #BP – purposes]   * *[if i] To deliver your product or service*   + To fulfill orders including electronic and non-electronic shipment * *[if ii] Building a Safe and Secure Environment*   + To verify or authenticate your identity; and   + Investigate and prevent security incidents such as breaches, attacks and hacks. * *[if iii] Providing, Developing, and Improving our Products and Services*    + Deliver, maintain, debug and improve our products and services.   + Enable you to access [company name] services and set up accounts. * *[if iv] Provide you with technical and customer support.* * *[if v] Organize and Deliver Advertising and Marketing*   + Send you newsletters and other marketing communications about current and future products, programs and services, events, competitions, surveys and promotions held by us or hosted on our behalf; and   + Organize events or register attendees and schedule meetings for events. * *[if vi insert text for Other]*   [end #BP]  Where we process your Personal Data to provide a product or service, we do so because it is necessary to perform contractual obligations. All of the above processing is necessary in our legitimate interests to provide products and services and to maintain our relationship with you and to protect our business for example against fraud. Consent will be required to initiate services with you. New consent will be required if any changes are made to the type of data collected. Within our contract, if you fail to provide consent, some services may not be available to you. | |
| [Enterprise only?] [if DS = b, c, or d] International Data Transfer and Storage Where possible, we store and process data on servers within the general geographical region where you reside (note: this may not be within the country in which you reside). [if b] Specifically, for European based companies, we have servers in the European Economic Area (EEA). [end b] Your Personal Data may also be transferred to, and maintained on, servers residing outside of your state, province, country or other governmental jurisdiction where the data laws may differ from those in your jurisdiction. We will take appropriate steps to ensure that your Personal Data is treated securely and in accordance with this Policy as well as applicable data protection law. [if c]Data may be kept in other countries that are considered adequate under your laws.[end c] [if d] In regions that are not considered adequate, we will enter into EU standard contractual clauses (or equivalent measures) with parties outside the EEA and ensure adequate controls are in place for the security of your data. [end d] More information about these clauses can be found here: <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32021D0914>  IF PRIVACY SHIELD CERTIFIED:  [Company] 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 Data transferred from the European Union, the United Kingdom and Switzerland to the United States, respectively. [Company]. has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit [https://www.privacyshield.gov/](https://www.privacyshield.gov/welcome).  With respect to personal data received or transferred pursuant to the Privacy Shield Frameworks, [Company] is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, we may be required to disclose Personal Information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.  [Company]’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, [Company] remains responsible and liable under the Privacy Shield Principles if third-party agents that it engages to process the personal data on its behalf do so in a manner inconsistent with the Principles, unless [Company] proves that it is not responsible for the event giving rise to the damage. In compliance with the Privacy Shield Principles, [Company] 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. European Union and Swiss individuals with Privacy Shield inquiries or complaints should first contact by email at [privacy@[company].com](about:blank).  [DIFFERENT RECOURSE MECHANISMS UNDER PRIVACY SHIELD]  [TRUSTE]  If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.  [VERASAFE]  Subject to the terms of the VeraSafe Privacy Shield Dispute Resolution Procedure, VeraSafe will provide appropriate recourse free of charge to you. To file a complaint with VeraSafe under the Privacy Shield Dispute Resolution Procedure, please submit the required information to VeraSafe here: <https://www.verasafe.com/privacy-services/dispute-resolution/submit-dispute/>  [ICDR/AAA Privacy Shield Program](http://go.adr.org/privacyshield.html)]  If you have an unresolved privacy or information security concern that we have not addressed satisfactorily, you may contact our U.S.-based independent recourse mechanism provider ICDR/AAA (free of charge) at <http://go.adr.org/privacyshield.html>.  [JAMS]  [Company] has further committed to refer unresolved Privacy Shield complaints to the [JAMS Foundation](https://www.jamsadr.com/), an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please contact or visit <https://www.jamsadr.com/> for more information or to file a complaint. The services of the JAMS Foundation are provided at no cost to you.  [EU DPA]  [Company] has further committed to refer unresolved Privacy Shield complaints to the EU Data Protection Authorities. Contact details for the EU data protection authorities can be found at <http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm>.[Company] will cooperate with the appropriate EU Data Protection Authorities during investigation and resolution of complaints brought under Privacy Shield. These recourse mechanisms are available to you at no cost.  Under certain conditions, more fully described on the Privacy Shield Principals website [https://www.privacyshield.gov](https://www.privacyshield.gov/), you may invoke binding arbitration when other dispute resolution procedures have been exhausted. Sharing and Disclosure We will share your Personal Data with third parties only in the ways set out in this Policy or set out at the point when the Personal Data is collected.  [if product === ‘shopify’]  Our online store is powered by Shopify. You can read more about how Shopify uses your Personal Data here:  <https://www.shopify.com/legal/privacy>.  [end]  [If answer #GA is YES - Google Anaylytics]  We also use Google Analytics to help us understand how our customers use the site. You can read more about how Google uses your Personal Data here:  <https://www.google.com/intl/en/policies/privacy/>.  You can also opt-out of Google Analytics here:  <https://tools.google.com/dlpage/gaoptout>.  [end #GA]  [If answer #RE is YES - remarketing]  We may also use your Personal Data to provide you with targeted marketing via advertisements or communications (such as newsletters).  For more information about how targeted advertising works, you can visit the Network Advertising Initiative’s (“NAI”) educational page at <http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>.    Additionally, you can opt out of some of these services by visiting the Digital Advertising Alliance’s opt-out portal at:  <http://optout.aboutads.info/>.  [end #RE] | |
| Legal Requirement We may use or disclose your Personal Data in order to comply with a legal obligation, in connection with a request from a public or government authority, or in connection with court or tribunal proceedings, to prevent loss of life or injury, or to protect our rights or property. Where possible and practical to do so, we will tell you in advance of such disclosure. | |
| Service Providers and Other Third Parties We may use a third party service provider, independent contractors, agencies, or consultants to deliver and help us improve our products and services. We may share your Personal Data with marketing agencies, database service providers, backup and disaster recovery service providers, email service providers and others but only to maintain and improve our products and services. For further information on the recipients of your Personal Data, please contact us by using the information in the “Contacting us” section below. | |
| Cookies | What are Cookies? A cookie is a small file with information that your browser stores on your device. Information in this file is typically shared with the owner of the site in addition to potential partners and third parties to that business. The collection of this information may be used in the function of the site and/or to improve your experience. How we use cookies [if #CK a]  We do not use cookies.  [end a]  [if not a]  To give you the best experience possible, we use the following types of cookies:  [if #CK b]  - Strictly Necessary. As a web application, we require certain necessary cookies to run our service.  [end b]  [if c || d]  - Preference. [if c]We use preference cookies to help us remember the way you like to use our service.[end c] [if d]Some cookies are used to personalize content and present you with a tailored experience. For example, location could be used to give you services and offers in your area.[end d]  [end c || d]  [if e]  - Analytics. We collect analytics about the types of people who visit our site to improve our service and product.  [end e]  [if f || g || h]  - Marketing. We share cookies with third party advertisers and/or partners to help provide you with a personalized marketing experience. [if h]We also allow third party partners to put their own cookies on our website.[end h]  [end f || g || h] How to control your cookies So long as the cookie is not strictly necessary, you may opt in or out of cookie use at any time. To alter the way in which we collect information from you, visit our Cookie Manager.  [if not a] | |
| Retention & Deletion | We will only retain your Personal Data for as long as necessary for the purpose for which that data was collected and to the extent required by applicable law. When we no longer need Personal Data, we will remove it from our systems and/or take steps to anonymize it. | |
| Merger or Acquisition | [Enterprise only?]  If we are involved in a merger, acquisition or asset sale, your personal information may be transferred. We will provide notice before your personal information is transferred and becomes subject to a different Privacy Policy. Under certain circumstances, we may be required to disclose your personal information if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency). | |
| How We Keep Your Data Safe | We have appropriate organizational safeguards and security measures in place to protect your Personal Data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed.  The communication between your browser and our website uses a secure encrypted connection wherever your Personal Data is involved.  We require any third party who is contracted to process your Personal Data on our behalf to have security measures in place to protect your data and to treat such data in accordance with the law.  In the unfortunate event of a Personal Data breach, we will notify you and any applicable regulator when we are legally required to do so. | |
| Children’s Privacy | We do not knowingly collect Personal Data from children under the age of  [insert answer #MA – age minimum] | |
| Your Rights for Your Personal Data | Depending on your geographical location and citizenship, your rights are subject to local data privacy regulations. These rights may include:  **Right to Access** (PIPEDA, GDPR Article 15, CCPA/CPRA, CPA, VCDPA, CTDPA, UCPA, LGPD, POPIA)  You have the right to learn whether we are processing your Personal Data and to request a copy of the Personal Data we are processing about you.  **Right to Rectification** (PIPEDA, GDPR Article 16, CPRA, CPA, VCDPA, CTDPA, LGPD, POPIA)  You have the right to have incomplete or inaccurate Personal Data that we process about you rectified.  **Right to be Forgotten** (right to erasure) (GDPR Article 17, CCPA/CPRA, CPA, VCDPA, CTDPA, UCPA, LGPD, POPIA)  You have the right to request that we delete Personal Data that we process about you, unless we need to retain such data in order to comply with a legal obligation or to establish, exercise or defend legal claims.  **Right to Restriction of Processing** (GDPR Article 18,, LGPD)  You have the right to restrict our processing of your Personal Data under certain circumstances. In this case, we will not process their Data for any purpose other than storing it.  **Right to Portability** (PIPEDA, GDPR Article 20, LGPD)  You have the right to obtain Personal Data we hold about you, in a structured, electronic format, and to transmit such Personal Data to another data controller, where this is (a) Personal Data which you have provided to us, and (b) if we are processing that data on the basis of your consent or to perform a contract with you or the third party that subscribes to [company name] services.  Right to Opt Out (CPRA, CPA, VCDPA, CTDPA, UCPA\*)  You have the right to opt out of the processing of your Personal Data for purposes of: (1) Targeted advertising; (2) The sale of Personal Data; and/or (3)\* Profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.  [(3)\* does not apply under UCPA)  Under CPRA, you have the right to opt out of the sharing of your Personal Data to third parties and our use and disclosure of your Sensitive Personal Data to uses necessary to provide the products and services reasonably expected by you.  **Right to Objection** (GDPR Article 21, LGPD, POPIA)  Where the legal justification for our processing of your Personal Data is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless we have compelling legitimate grounds for processing which override your interests and rights, or if we need to continue to process the Personal Data for the establishment, exercise or defense of a legal claim.  **Nondiscrimination and nonretaliation** (CCPA/CPRA, CPA, VCDPA, CTDPA, UCPA). You have the right not to be denied service or have an altered experience for exercising your rights.  File an Appeal (CPA, VCDPA, CTDPA) You have the right to file an appeal based on our response to you exercising any of these rights. In the event you disagree with how we resolved the appeal, you have the right to contact the attorney general located here:  [Attorney General  Address  Telephone  Email]  File a Complaint. (GDPR Article 77, LGPD, POPIA). You have the right to bring a claim before their competent data protection authority. | |
| Withdrawing Consent If you have consented to our processing of your Personal Data, you have the right to withdraw your consent at any time, free of charge, such as where you wish to opt out from marketing messages that you receive from us. If you wish to withdraw your consent, please contact us using the information found at the bottom of this page. | |
| How to Exercise Your Rights You can make a request to exercise any of these rights in relation to your Personal Data by sending the request to our privacy team by using the form below.  For your own privacy and security, at our discretion, we may require you to prove your identity before providing the requested information. | |
| Changes | We may modify this Policy at any time. If we make changes to this Policy then we will post an updated version of this Policy at this website. When using our services, you will be asked to review and accept our Privacy Policy. In this manner, we may record your acceptance and notify you of any future changes to this Policy. | |
| Complaints | If you have a complaint about this Policy or any element of your personal information that we hold then please contact us at the above address. If you are not satisfied, then you have the right to lodge a complaint with the local data protection authority.  If you are based in the EEA, please visit this website (<http://ec.europa.eu/newsroom/article29/document.cfm?action=display&doc_id=50061>) for a list of local data protection authorities . | |
| Contact Us | To contact us, please email [insert #CM **email address**]  [If answer #CM is yes – mailing address can be shared]  Write to us at:  Data Privacy Officer of [company name].  [insert answer to #CM – mailing address]  [end #2]  [if answer to #CM ii is YES]  Call us at:  [insert #CM ii phone number]  [end #CM] | |
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