**PRIVACY POLICY**

1. ***Introduction***

Proxxy, Inc., DBA “Proxy” (“Company,” or “we,” “us” and “our”) values your privacy and is committed to maintaining your trust. We provide this Privacy Policy to inform you of our policies and procedures regarding the collection, use, and disclosure of personally identifiable information received from visitors to and/or users of the Company’s website located at [www.useproxy.com](http://www.useproxy.com) and [www.mobile.useproxy.com](http://www.mobile.useproxy.com) (the "Website") and provision of services online. Specifically, the Company provides financial services for home buyers to go green through its Website and/or mobile application (“App”) (collectively, the "Services").

***II. General Data Protection Regulation***

This Company is headquartered in Utah. As a Utah-based company, we do not knowingly advertise in the European Union (EU), or market our Services to residents of the EU. However, our Website and/or App do not restrict visitors from the EU; we do not have in place any protections to prevent EU residents from accessing our Website and/or App. As a result, we provide the foregoing disclosure to EU data subjects.

The Company’s processing[[1]](#footnote-0) of the Personal Information[[2]](#footnote-1), such as the name, address, email address, or telephone number of an EU data subject (hereinafter, “Personal Information” or “Personal Data”) that is voluntarily supplied by the individual, or supplied by an authorized third party,[[3]](#footnote-2) shall always be in line with the General Data Protection Regulation (“GDPR”), and in accordance with the country-specific data protection regulations applicable to the Company.

By means of this Privacy Policy, our Company would like to inform you of the nature, scope, and purpose of the Personal Information we collect, use and process, as defined herein. Specifically, if you are an EU data subject visiting our Website or downloading our App, you are hereby informed, by means of this section of our Privacy Policy, of the rights to which you are entitled, and the recourse you may seek if you have any questions regarding the collection, use, and processing of Personal Information by the Company. You may email us with requests at jacob@useproxy.com.

***Your Privacy Rights under the GDPR.*** The GDPR includes the following rights for you, as an EU data subject, if you provide Personal Information to the Company in connection with accessing the Services or visiting our Website:

* The right to be informed about how we store, use, or share your data;
* The right to access your data;
* The right to rectify your data;
* The right to have us erase your data;
* The right to prevent us from processing your data;
* The right to request copies of your data from us in a commonly-used and machine-readable format, free of charge, for the purposes of transfer to a third party, where technically feasible;
* The right to object to use or sharing of your data; and
* The right not to be subject to automated decision-making, including profiling

***Legitimate Business Interest under the GDPR.*** Our use of your Personal Information is based on the legitimate business grounds that:

* The use is necessary in order to fulfill our commitments to you under our Terms of Service or other agreements with you or is necessary to administer your account – for example, in order to enable access to our Website on your device or charge you for our Services;
* The use is necessary for compliance with a legal obligation;
* The use is necessary in order to protect your vital interests or those of another person or entity;
* We have a legitimate interest in using your information – for example, to provide and update our Website or Services, to improve our Website or Services so that we can offer you an even better user experience, to safeguard our Website or Services, to communicate with you, to measure, gauge, and improve the effectiveness of our advertising, and better understand user retention and attrition, to monitor and prevent any problems with our Services, and to personalize your experience; and/or
* You have given us your consent.

***Data Retention/Erasure.*** We will retain your Personal Information for as long as needed to provide the applicable Services, or for a minimum period of four (4) years. If, at any time after agreeing to this Privacy Policy, you: (1) change your mind about receiving information from us; (2) wish to revoke permission for us to retain and use your Personal Information; (3) wish to object to the processing of your Personal Information; or (4) wish for us to erase a copy of your data, please make a request to the Company at jacob@useproxy.com. If you request erasure of your data, we may retain some of your Personal Information only for legitimate business interests, such as fraud detection, prevention, and enhancing the safety of our Website; and to comply with our legal obligations, specifically our tax, legal reporting, and auditing obligations.

***Our Response to Your Requests***. If you make any requests regarding your Personal Information, we will not charge you for compliance with the request. The Company will respond and comply within 30 days. The Company reserves the right to refuse or charge for requests that are **manifestly unfounded or excessive**. If we refuse your request, we will tell you why we are refusing your request. You have the right to complain to the relevant supervisory authority and to a judicial remedy, but you must do so within one month of our refusal.

***Data Controller***. The Company is the “data controller,” as defined under the GDPR, or the legal entity which determines the purposes and means of the processing of Personal Information of the customers of the Company and visitors to its Website. The Company is responsible for collecting your consent, managing consent-revoking, enabling right to access, etc. If you wish to revoke consent for us to store, use, or share your Personal Information, you may contact us at Jacob@useproxy.com.

***Data Processor.*** The Company is the “data processor," as defined under the GDPR, or the legal entity which processes, as this term is defined here in footnote 1, your Personal Information. The Company has not retained any third-party service provider to process your Personal Information. Any processing of Personal Information shall be done solely by the Company. The Company maintains records of any processing activities it performs, and is able to show how the Company complies with the data protection principles under the GDPR. It has effective policies and procedures in place. If you have questions regarding the processing of your Personal Data, you may contact us at Jacob@useproxy.com.

***Data Protection Officer.*** The Company is not formally required to designate a Data Protection Officer (“DPO”) because it is not: (1) a public authority; (2) an organization that carries out regular and systematic monitoring of individuals on a **large scale**; or (3) an organization that carries out **large scale** processing of special categories of data, such as health information or information about criminal convictions. You may contact Jacob Wright, CTO of the Company. Jacob Wright is responsible for data protection compliance and can answer any questions you may have about your Personal Information. Jacob Wright may be reached at Jacob@useproxy.com.

***Breach***. The Company has reasonable internal policies and procedures in place to effectively detect, report, and investigate a data breach. The GDPR defines a Personal Information breach as “a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Personal Information.” Pursuant to the GDPR, the Company will notify you of a Personal Information breach where the Personal Information breaches are likely to present a risk to data subjects to data protection authorities (“DPAs”) without undue delay, and within 72 hours if feasible, after becoming aware of the breach; and communicate high-risk breaches to affected data subjects without undue delay. In the unfortunate event of breach, the Company shall provide you with: (i) contact details of the DPO or other contact person for the Company, (ii) a description of the nature of the breach, (iii) likely consequences of the breach, (iv) measures the Company has taken or proposes to take to address the breach, and (v) advice on steps data subjects can take to protect themselves.

***Note: Data Protection Impact Assessment (DPIA).*** The Company is not required to undergo a DPIA because the Company’s data processing is not likely to result in a high risk to data subjects, such as in cases where: (1) new technology is being deployed; (2) profiling operations may significantly affect individuals; or (3) processing is on a **large scale** and involves special categories of data. If you have any questions regarding DPIA compliance by the Company, you may contact us at Jacob@useproxy.com.

***Complaints.*** Without prejudice to any other administrative or judicial remedy, every EU data subject shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement of the data subject considers that the processing of Personal Information relating to him or her infringes this Regulation.

***III. Use, Processing, and Sharing of Personal Information***

The following information applies to anyone who shares with us his, her, or a third-party’s[[4]](#footnote-3) Personal Information[[5]](#footnote-4). We may use, process,[[6]](#footnote-5) and/or share your Personal Information (and we have done so in the past 12 months):

* To respond to your inquiries and your requests regarding our Website or Services.
* To send you information regarding our services and changes to our terms, conditions, and policies.
* To complete your account registration, process your payments, and communicate with you regarding your purchase of our Services.
* To send you marketing communication and newsletters about our Services.
* To personalize your experience on our Website.
* To inform you and allow you to participate in our Company’s promotions.
* To facilitate social sharing functionality.
* To collaborate with business affiliates, partners, vendors, or service providers to provide you with our Services.
* In connection with our business purposes, as described above, including but not limited to data analysis, audits, fraud monitoring and prevention, developing or enhancing new and existing products and/or services, expanding our business activities, etc.

We will not use and/or share your Personal Information:

* To run interest-based advertising campaigns that collect Personal Information such as email addresses, telephone numbers, and credit card numbers.
* To use or associate Personal Information with remarketing lists, cookies, data feeds, or other anonymous identifiers.
* To use or associate targeting information, such as demographics or location, with any Personal Information collected from the ad or its landing page.
* To share any Personal Information with Google or third party companies through our remarketing tag or any product data feeds which might be associated with our ads.
* To send Google or third party companies precise location information without obtaining your consent.

However, we reserve the right to disclose Personal Information that we believe, in our sole discretion, to be necessary or appropriate in the following circumstances:

* As required by law, such as to comply with a subpoena, or similar legal process.
* When we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.
* To enforce our Terms of Service.
* To allow us to pursue available remedies or limit the damages that we may sustain.

***IV. Collection of Other Information***

***Personally Non-Identifiable Information***: We may collect personally non-identifiable information, including but not limited to demographic data, age, education level, profession, geographic location or gender, from you at the time of registration on our Website or app, or when you choose to use our Services. This information is not, by itself, sufficient to identify or contact you. The Company may store such information, or it may be included in databases owned and maintained by partners, affiliates, agents, or service providers of the Company. The Company may use such information and pool it with other information to track data related to growing the business, such as the total number of visitors to our Website and the domain names of our visitors' Internet service providers.

***Location-Based Information.*** Our Service may use location-based services in order to locate you so we may verify your location, deliver you relevant content based on your location as well as to share your location with our vendors as part of the location-based services we offer. We may, from time to time, provide settings in the Services that permit you to disable location-based services. Changing setting options may not result in immediate changes to the settings, which are subject to our operations and maintenance schedules. Users should carefully consider the use of such settings to improve information display options and to ensure the settings are properly set and functioning in the manner desired. Notwithstanding the availability of privacy preference settings, you should be aware that these settings are for convenience only, do not employ complex data security protection and may not be error free. However, please note that we will only directly provide third parties we work with access to your exact location information if you first give us permission to do so. You should consider the risks involved in disclosing your location information to other people.

***Aggregated Personal Data***: The Company may analyze your Personal Information provided through the Website or in connection with rendering the Services, in aggregate form. This aggregate information does not identify you personally. We may share this aggregate data with our partners, affiliates, agents, or service providers for business purposes. We may also disclose aggregated statistics to explain our Services to current and prospective business partners, and to other third parties for other lawful, business-related purposes.

***V. Website Tracking***

We may, either directly or through third party companies and individuals we engage to provide services to us, also:

* Track your use of our Website and the Services for purposes of our own customer support, analytics, research, product development, fraud prevention, risk assessment, regulatory compliance, investigation, etc.
* Track your use of the Website and the Services to enable you to use and access the Services and pay for your activities on the Website and through the Services.
* Track your behavior on our own Website and use of the Services to market and advertise our services to you on our Website platform and third party websites. You may opt out of receiving advertisements by visiting the Network Advertising Initiative (<http://www.networkadvertising.org/choices/>) and/or the Digital Advertising Alliance (<http://www.aboutads.info/choices/>). Please note that even if you choose to opt-out of receiving targeted advertising, you may still receive advertising on the Services, generally. The advertising will simply not be targeted or specific to your interests.

***VI. Tracking Technologies on our Website***

The Company may use the foregoing technologies to track your activity on our Website:

***Cookies.*** When you visit our Website or otherwise interact with the Service, we may send one or more “cookies” to your computer or other devices. Cookies are alphanumeric identifiers stored on your computer through your web browser and are used by most websites to help personalize your web experience. Some cookies may facilitate additional site features for enhanced performance and functionality such as remembering preferences, allowing social interactions, analyzing usage for site optimization, providing custom content, allowing third parties to provide social sharing tools, and serving images or videos from third party websites. Some features on this site will not function if you do not allow cookies. We may link the information we store in cookies to any Personal Information that you submit while visiting our Website.

We may use both session ID cookies and persistent cookies. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. Persistent cookies enable us to track and target the interests of our users to enhance the experience on our site.

Functional cookies, persistent and session type, store information to enable core site functionality, such as Live Chat and Client ID remembrance.

Analytics cookies allow us to count page visits and traffic sources so we can measure and improve the performance of our site and our marketing campaigns.

Advertising cookies may be set through our Website by our advertising partners. Data may be collected by these companies that enable the companies to serve up advertisements on other sites that are relevant to your interests.

If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to automatically decline cookies, or be given the choice of declining or accepting the transfer to your computer of a particular cookie (or cookies) from a particular site. You may also wish to refer to <http://www.allaboutcookies.org/manage-cookies/index.html>.

If you reject cookies, you may still use our site, but some features on the site will not function properly.

***Log Files.*** A Log File is a file that records either events that occur in an operating system or other software runs, or messages between different users of a communication software. Log file information is automatically reported by your browser or mobile application each time you access the Website or our Services. Along with cookies and web beacons, log files help provide additional functionality to the Website and Services and help us analyze Website and Services usage more accurately. We and our third party tracking-utility partners may use log files on our Service to gather automatically gather and store information including, but not limited to, internet protocol (“IP”) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data, for business purposes. We may use Google Analytics, which uses cookies and other similar technologies to collect and analyze information about the use of the Service and report on activities and trends. This service may also collect information regarding the use of other websites, apps and online resources. You can learn about Google’s practices by going to [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/), and opt out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

***VIII. Links to Other Websites***

This Privacy Policy does not address, and we are not responsible for the privacy, information or other practices of any third parties. This Privacy Policy applies only to this Website and the Company’s Services. It does not apply to any third-party sites, and the inclusion of a link does not imply endorsement of the linked site or service by us or by our affiliates.

We are not responsible for the collection, usage and disclosure policies and practices (including the data security practices) of other organizations, such as Facebook, Apple, Google, Microsoft, RIM, Sun Run, Blue Raven Solar, Vivint, Energy Star or any other app developers, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including any Personal Information you disclose to other organizations through or in connection with the Website, app, or Services.

***IX. Security***

We maintain reasonable and appropriate, although not infallible, security precautions. However, we cannot guarantee that hackers or unauthorized personnel will not gain access to your Personal Information, despite our reasonable efforts. You should note that in using the Website, app, and/or our related Services, your information will travel through third-party infrastructures which are not under our control. Please feel free to raise any questions, concerns or specific directions you may have regarding the privacy and security of your information to Jacob@useproxy.com.

***X. Data Retention***

We will retain your Personal Information for four (4) years, or as long as needed to provide the applicable Services. Our data retention period may change in the future if a longer retention period is required or permitted by law.

***XI. Do Not Track***

Your browser setting may allow you to automatically transmit a "Do Not Track" signal to websites you visit. The Company’s Website does not respond to "Do Not Track" signals or other mechanisms from a visitor's browser. If, in the future, we create a program or protocol to respond to such web browser "Do Not Track" signals, we will inform you of the details of that protocol in this Privacy Policy. To find out more about "Do Not Track," please visit [https://www.allaboutdnt.com](https://www.allaboutdnt.com/).

***XII. Advertising/Google Ads***

On this Website, the Company has integrated Google Ads. Google Ads is a service for Internet advertising that allows the advertiser to place ads in Google search engine results and the Google advertising network. Google Ads allows an advertiser to pre-define specific keywords with the help of which an ad on Google’s search results only then displays when the user utilizes the search engine to retrieve a keyword-relevant search result. In the Google Advertising Network, the ads are distributed on relevant web pages using an automatic algorithm, taking into account the previously defined keywords.

The operating company of Google Ads is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, United States.

The purpose of Google Ads is the promotion of our website by the inclusion of relevant advertising on the websites of third parties and in the search engine results of the search engine Google and an insertion of third-party advertising on our website.

If a data subject reaches our website via a Google ad, a conversion cookie is filed on the information technology system of the data subject through Google. The definition of cookies is explained above. A conversion cookie loses its validity after 30 days and is not used to identify the data subject. If the cookie has not expired, the conversion cookie is used to check whether certain sub-pages, e.g, the shopping cart from an online shop system, were called up on our website. Through the conversion cookie, both Google and the controller can understand whether a person who reached a Google Ads ad on our website generated sales, that is, executed or canceled a sale of goods.

The data and information collected through the use of the conversion cookie is used by Google to create visit statistics for our website. These visit statistics are used in order to determine the total number of users who have been served through Google Ads ads to ascertain the success or failure of each Google Ads ad and to optimize our Google Ads ads in the future. Neither our company nor other Google Ads advertisers receive information from Google that could identify the data subject.

The conversion cookie stores personal information, e.g. the Internet pages visited by the data subject. Each time we visit our Internet pages, Personal Information, including the IP address of the Internet access used by the data subject, is transmitted to Google in the United States of America. Personal Information is stored by Google in the United States of America. Google may pass these Personal Information collected through the technical procedure to third parties.

The data subject may, at any time, prevent the setting of cookies by our website, as stated above, by means of a corresponding setting of the Internet browser used and thus permanently deny the setting of cookies. Such a setting of the Internet browser used would also prevent Google from placing a conversion cookie on the information technology system of the data subject. In addition, a cookie set by Google Ads may be deleted at any time via the Internet browser or other software programs.

The data subject has a possibility of objecting to the interest based advertisement of Google. Therefore, the data subject must access from each of the browsers in use the link www.google.com/settings/ads and set the desired settings.

Further information and the applicable data protection provisions of Google may be retrieved under https://www.google.com/intl/en/policies/privacy/.

***XIII. Analytics***

***Google Analytics*.** We and our third-party tracking-utility partners use log files on our Service to automatically gather certain information, including but not limited to internet protocol (“IP”) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data, for analytics purposes. Specifically, we analyze trends, administer the site, track users’ movements around the Website, and gather demographic information about our user base as a in the aggregate. We and our third party tracking-utility partners use log files on our Service to automatically gather certain information, including but not limited to internet protocol (“IP”) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data, for analytics purposes. Specifically, we analyze trends, administer the site, track users’ movements around the Website, and gather demographic information about our user base as a in the aggregate.

On this Website, the Company has integrated the component of Google Analytics. Google Analytics is a web analytics service. Web analytics is the collection, gathering, and analysis of data about the behavior of visitors to websites. A web analysis service collects, inter alia, data about the website from which a person has come (the so-called referrer), which sub-pages were visited, or how often and for what duration a sub-page was viewed. Web analytics are mainly used for the optimization of a website and in order to carry out a cost-benefit analysis of Internet advertising.

The operator of the Google Analytics component is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, United States.

The purpose of the Google Analytics component is to analyze the traffic on our website. Google uses the collected data and information, inter alia, to evaluate the use of our Website and to provide online reports, which show the activities on our websites, and to provide other services concerning the use of our Internet site for us.

Google Analytics places a cookie on the information technology system of the data subject. The definition of cookies is explained above. With the setting of the cookie, Google is enabled to analyze the use of our website. With each call-up to one of the individual pages of this Internet site, which is operated by the controller and into which a Google Analytics component was integrated, the Internet browser on the information technology system of the data subject will automatically submit data through Google Analytics component for the purpose of online advertising and the settlement of commissions to Google. During the course of this technical procedure, the enterprise Google gains knowledge of Personal Information, such as the IP address of the data subject, which serves Google, inter alia, to understand the origin of visitors and clicks, and subsequently create commission settlements.

The cookie is used to store Personal Information, such as the access time, the location from which the access was made, and the frequency of visits to our Website by the data subject. With each visit to our Internet site, such Personal Information, including the IP address of the Internet access used by the data subject, will be transmitted to Google in the United States of America. Personal Information is stored by Google in the United States of America. Google may pass these Personal Information collected through the technical procedure to third parties.

The data subject may, as stated above, prevent the setting of cookies through our Website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent Google Analytics from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by Google Analytics may be deleted at any time via a web browser or other software programs.

In addition, the data subject has the possibility of objecting to a collection of data that is generated by Google Analytics, which is related to the use of this Website, as well as the processing of this data by Google and the chance to preclude any such. For this purpose, the data subject must download a browser add-on under the link https://tools.google.com/dlpage/gaoptout and install it. This browser add-on tells Google Analytics through a JavaScript, that any data and information about the visits of Internet pages may not be transmitted to Google Analytics. The installation of the browser add-ons is considered an objection by Google. If the information technology system of the data subject is later deleted, formatted, or newly installed, then the data subject must reinstall the browser add-ons to disable Google Analytics. If the browser add-on was uninstalled by the data subject or any other person who is attributable to their sphere of competence, or is disabled, it is possible to execute the reinstallation or reactivation of the browser add-ons.

Further information and the applicable data protection provisions of Google may be retrieved under https://www.google.com/intl/en/policies/privacy/ and under http://www.google.com/analytics/terms/us.html. Google Analytics is further explained under the following Link <https://www.google.com/analytics/>.

***Facebook Analytics***. The Company also utilizes **Facebook Analytics,** which allows us to analyze data, trends and charts related to your use of our Services, including but not limited to data related to your launching, viewing content, searching or purchasing.

Facebook is a social network. A social network is a place for social meetings on the Internet, an online community, which usually allows users to communicate with each other and interact in a virtual space. A social network may serve as a platform for the exchange of opinions and experiences, or enable the Internet community to provide personal or business-related information. Facebook allows social network users to include the creation of private profiles, upload photos, and network through friend requests.

The operating company of Facebook is Meta Platforms, Inc., 1 Hacker Way, Menlo Park, CA 94025, United States. If a person lives outside of the United States or Canada, the controller is Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

With each call-up to one of the individual pages of this Website, which is operated by the controller and into which a Facebook component (Facebook plug-ins) was integrated, the web browser on the information technology system of the data subject is automatically prompted to download display of the corresponding Facebook component from Facebook through the Facebook component. An overview of all the Facebook Plug-ins may be accessed under https://developers.facebook.com/docs/plugins/. During the course of this technical procedure, Facebook is made aware of what specific part of the Website was visited by the data subject.

If the data subject is logged in at the same time on Facebook, Facebook detects with every call-up to our Website by the data subject—and for the entire duration of their stay on our Internet site—which specific sub-site of our Internet page was visited by the data subject. This information is collected through the Facebook component and associated with the respective Facebook account of the data subject. If the data subject clicks on one of the Facebook buttons integrated into our Website, e.g. the “Like” button, or if the data subject submits a comment, then Facebook matches this information with the personal Facebook user account of the data subject and stores the personal data.

Facebook always receives, through the Facebook component, information about a visit to our website by the data subject, whenever the data subject is logged in at the same time on Facebook during the time of the call-up to our Website. This occurs regardless of whether the data subject clicks on the Facebook component or not. If such a transmission of information to Facebook is not desirable for the data subject, then he or she may prevent this by logging off from their Facebook account before a call-up to our Website is made.

The data protection guideline published by Facebook, which is available at https://facebook.com/about/privacy/, provides information about the collection, processing and use of personal data by Facebook. In addition, it is explained there what setting options Facebook offers to protect the privacy of the data subject. In addition, different configuration options are made available to allow the elimination of data transmission to Facebook. These applications may be used by the data subject to eliminate a data transmission to Facebook.

***XV. Open ID Providers/Facebook Connect***

You may log into your account on our Website and/or access our Services using sign-in services such as Facebook Connect or an Open ID provider. These services will authenticate your identity and provide you the option to share certain Personal Information with us, such as your name and email address to pre-populate our registration form. Services, like Facebook Connect, give you the option to post information about your activities on this Website to your profile page to share with others within your network if you so choose.

***XVII. Referrals***

If you choose to use our referral service to tell a friend about our Services by email, we will ask for your friend’s email address, and send your friend a one-time email inviting them to visit our Website and inform them of our Services. We will only store your friend’s email address for the sole purpose of sending this one-time message and tracking the success of the referral program. Your friend may contact us at Jacob@useproxy.com to request that we remove this information from our database at any time.

If you submit any Personal Information relating to other people to us or to our service providers in connection with our Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

## ***XVIII. Testimonials, Ratings and Reviews***

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## If you submit testimonials, ratings, or reviews of the Services directly on our Website, any Personal Information you include will be displayed on the Website. We may also partner with third-party service providers to collect and display ratings and review content on our Website. If you provide our third-party service providers with your Personal Information in the process of submitting your rating and review, the content and Personal Information collected by a third party will be posted on our Website, absent your express instruction not to do so. If you want your testimonial, rating, or review removed from our Website at any time, please contact us at Jacob@useproxy.com.

***XIX. Changes***

This Privacy Policy may be updated from time to time for any reason, at our sole discretion. We will notify you of any material changes to our Privacy Policy by posting the new Privacy Policy on our Website, and emailing you a copy of the revised Privacy Policy or a link to it. You are advised to consult our Website regularly for any changes.

***XX. Incorporation into Terms of Service***

By using or accessing the Website or the Services, you are accepting the practices described in this Privacy Policy, and you are consenting to our processing of your information as set forth in this Privacy Policy and as amended by us. This Privacy Policy is incorporated into, and considered a part of, the Company’s Terms of Service.

***XXI. Opt-Out Policy***

If, at any time after registering, you change your mind about receiving information from us or about the use of information volunteered by you, or if you prefer that we do not share your Personal Information with third parties for marketing purposes, please contact us at Jacob@useproxy.com.

***XXII. Contact Us***

If you have any questions or concerns relating to our use of your Personal Information, please email Jacob@useproxy.com. Additionally, you may reach us by postal mail at:

Proxxy, Inc.

9631 Sweet Blossom Drive, South Jordan, Utah 84095

1. ***Processing.*** “Processing” covers a wide range of operations performed on personal data, including by manual or automated means. It includes the collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of personal data. *See* Article 4(2) and (6) of the GDPR. [↑](#footnote-ref-0)
2. ***Personal Information.*** “Personal Information” may include, but is not limited to information that identifies you as an individual or relates to an identifiable person, such as name, postal address, telephone number, email address, etc. The Company does not collect any Personal Information from visitors to its website that is not voluntarily provided. The Company only collects your Personal Information if you register for an account with the Company’s Website, when you use the Company’s Services, and when you send the Company communications in connection with your use of the Services. [↑](#footnote-ref-1)
3. ***Third Party Personal Information.*** We may obtain your Personal Information from third parties, such as third parties with whom we affiliate in providing the Company’s services. If you provide the Company with Personal Information about third parties, you warrant to the Company that any Personal Information that you provide to the Company about any third party individuals was obtained by you with full consent, that you have the legal authority to provide us with such information, and that the individual has not communicated to you that they wish to opt out of receiving communications from the Company or having the Company collect information about him or her. [↑](#footnote-ref-2)
4. ***Third Party Personal Information.*** We may obtain your Personal Information from third parties, such as third parties with whom we affiliate in providing the Company’s services. If you provide the Company with Personal Information about third parties, you warrant to the Company that any Personal Information that you provide to the Company about any third party individuals was obtained by you with full consent, that you have the legal authority to provide us with such information, and that the individual has not communicated to you that they wish to opt out of receiving communications from the Company or having the Company collect information about him or her. [↑](#footnote-ref-3)
5. ***Personal Information.*** “Personal Information” may include, but is not limited to information that identifies you as an individual or relates to an identifiable person, such as name, postal address, telephone number, email address, etc. The Company does not collect any Personal Information from visitors to its website that is not voluntarily provided. The Company only collects your Personal Information if you register for an account with the Company’s Website, when you use the Company’s Services, and when you send the Company communications in connection with your use of the Services. [↑](#footnote-ref-4)
6. ***Process.*** “Processing” covers a wide range of operations performed on personal data, including by manual or automated means. It includes the collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of personal data. [↑](#footnote-ref-5)