

# Privacy Policy

**Effective Date:** [Insert Date]

## 1. Introduction

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We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy notice or our practices with regard to your personal information, please contact us at [support@suroo.com](mailto:support@suroo.com).

## 2. Information We Collect

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We collect personal information that you voluntarily provide to us when you register on the Suroo, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Suroo, or otherwise when you contact us.

- **Personal Information Provided by You:** We collect names; phone numbers; email addresses; mailing addresses; and other similar information.
- **Payment Data:** We may collect data necessary to process your payment if you make purchases, such as your payment instrument number (e.g., credit card number), and the security code associated with your payment instrument. All payment data is stored by Stripe. You may find their privacy notice link(s) here: <https://stripe.com/en-pt/privacy>.

## 3. How We Use Your Information

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We use personal information collected via our Services for a variety of business purposes described below:

- **To facilitate account creation and logon process.**
- **To post testimonials.** We post testimonials on our Services that may contain personal information.
- **Request feedback.** We may use your information to request feedback and to contact you about your use of our Services.

- To enable user-to-user communications.** We may use your information in order to enable user-to-user communications with each user's consent.
- To manage user accounts.** We may use your information for the purposes of managing our account and keeping it in working order.
- To send administrative information to you.** We may use your personal information to send you product, service, and new feature information and/or information about changes to our terms, conditions, and policies.
- To protect our Services.** We may use your information as part of our efforts to keep our Services safe and secure (for example, for fraud monitoring and prevention).
- To enforce our terms, conditions, and policies** for business purposes, to comply with legal and regulatory requirements, or in connection with our contract.
- To respond to legal requests and prevent harm.** If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- To deliver and facilitate delivery of services to the user.** We may use your information to provide you with the requested service.
- To respond to user inquiries/offer support to users.** We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Services.

## 4. Sharing Your Information

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We may process or share your data that we hold based on the following legal basis:

- Consent:** We may process your data if you have given us specific consent to use your personal information for a specific purpose.
- Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.
- Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

•**Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

## 5. Cookies and Other Tracking Technologies

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We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

## 6. Data Retention

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We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than [Insert Retention Period].

## 7. Data Security

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We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information.

## 8. Your Privacy Rights

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You have the right to Request access to and obtain a copy of your personal information.