

Luive.com Privacy policy

We know you are excited to use our platform, but first, let us explain how we handle your personal information and how we use it, so we can make the best decisions about the information you share with us. This Privacy Policy is a statement of our commitment to data protection and it reveals how Luive.com collects, handles, and processes its user's data.

Please visit this section regularly as the policy may be subject to changes or updates. any significant changes to this policy will be notified by e-mail or other communication channels.

By using Luive.com, you agree to the collection, processing, storing, and transfer of your data as described in this Privacy Policy.

The information collected on our platform is subject to the General Data Protection Regulation 2016/679 (Regulation (EU) 2016/679), known as the GDPR and The California Consumer Privacy Act Notice (CCPA)

This Privacy Policy ("Policy") describes how our Platform ("Luive.com", "we", "us" or "our") collects, protects, and uses the personally identifiable information ("Personal Information") you ("User", "you" or "your") may provide on the (Luive.com) platform and any of its applications (collectively, "Platform" or "Services").

This Privacy Policy applies only to Luive.com and remember that, in some cases, we are not responsible for third parties and the way these companies process personal data.

In addition to this Privacy Policy, please read our <u>Cookies Policy</u> and <u>Terms and Conditions</u>.

Who Are We

We, INTERNATIONAL SOCIAL MEDIA S.R.L. ("Luive"), are the developers of <u>Luive.com</u>, a premium social media platform where everyone can make money.

Luive is a social structure that helps creators share their content, and others to enjoy that content. Every user **on** the platform can buy content within the platform as long as it respects the rules stated in our <u>Terms and Conditions</u>.

When users create an account and share information with Luive.com, this Policy applies.

Information about our company: International Social Media SRL, headquartered in EU, Romania, Bucharest, 67 Logofatul Tautu Street, fiscal code: 31146090.

Contact details: support@Luive.com | www.Luive.com



office@decalex.ro



When do we collect data about you

For transparency reasons you can visit some sections of our Platform without telling us who you are or having an active account, thus being impossible to identify you in these situations or revealing any information by which someone could identify you as a specific, identifiable person. If, however, you wish to use our Platform's main features, you may be asked to provide certain Personal Information.

In general, we collect personal data when you:

- register on <u>Luive.com</u> as an active user;
- use the Platform to share content, buy content or in any other way;
- contact our Support Service for problems regarding the use of Luive.com;

We will also use these data to update our database and, to the extent permitted by law, send you an occasional newsletter that will inform you about new features of the Platform and other items and tools that may help you use Luive.com.

How do we use personal data

Please find below the purposes for which we process your personal data, the people who have access to your data, and how we store it.

1. We collect information about you when you open an account on our platform

We use this information to facilitate your access to <u>Luive.com</u>. Without the processing of these personal data, running and operating our **p**latform is impossible.

By registering an account on our platform, you will be able to:

- access free content posted by users;
- access paid content if you pay the subscription to a publisher or purchase content;
- post your own content;
- chat with other users;

	E-mail, Unique Username, Password, Luive Name, Age check, Gender (optional), Online identifiers (IP);
Why do we process your data in	We process your data in order to facilitate your access to services on the online platform and to the functions associated with your account (art. 6/1/b of 2016/679 (EU) Regulation);







With whom we may share your data	 IT service providers for our company like hosting and data storage (<u>Reflected Network LLC</u>); Providers to whom we outsource certain technical support services for our website, or customer relationship management system providers (<u>Kayako Limited</u>); Regulators and other state authorities, if required by legal or statutory requirements.
How long we store the data	We will keep the data registered on your account until you decide to close it, or if more than five years have passed since your last login on the account;
Where the data is stored	The data registered through our website and applications will be stored on the hosting provider's servers located in the EU; The data we download locally will be stored on our secure, local, and cloud servers.

We recommend you to (fara) follow these guidelines when setting passwords:

- Use both uppercase and lowercase letters (for example a-z and A-Z)
- Use numbers and special characters (e.g.! @ # \$% ^ & * () _ + =} {: "?> <)
- Use at least six alphanumeric characters
- Do not use personal information (e.g. last name, etc.)

2. We collect data about you during the account validation process

The services offered by our platform are addressed only to users who have turned 18 years old. To prevent scams, we have implemented a unique system for verifying the identity of our users.

By validating your account, you will receive access to the following features:

- cashout Luives;
- levelling up;

The information required to verify your account will not be shared with other users. We will keep all information safe and confidential.

Personal during	data the	•	Account data, ID, picture of yourself holding your ID card, Real first name, Real last name, Real birth date;
validation			hame, Keal last hame, Keal birth uate,
Vandation	proces	55	





Why do we process your data in this case?	We process your data in order to verify your real identity in pursuit of our legitimate interest in preventing fraud (Art. 6/1/f of 2016/679 (EU) Regulation) and to prevent the access of minor users (under 18 years old) to content that does not correspond to their age, in accordance with applicable legal provisions (Art. 6/1/c of 2016/679 (EU) Regulation);
With whom we may share your data	 IT service providers for our company like hosting and data storage (<u>Reflected Network LLC</u>); Providers to whom we outsource certain technical support services for our website or customer relationship management system providers (<u>Kayako Limited</u>); Regulators and other state authorities, if required by legal or statutory requirements; Payment processors that manage all the necessary tasks to complete a transaction on our platform;
How long we store the data	We will keep the data registered on your account until you decide to close it, or if more than five years have passed since your last login on the account;
Where the data is stored	The data registered through our website and applications will be stored on the hosting provider's servers located in the EU; The data we download locally will be stored on our secure, local, and cloud servers.
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3. When you make transactions

By transactions, we refer to purchases, deposits (acquisition of Luives) withdrawals (cash out) and referrals. All these actions involve the processing of user's personal data involved in those transactions.

To be able to generate income, you must access the payout section of Luive.com, where after being validated as a verified user, you must enter the details for the payout information, and you may also need to add legal information that will depend on your country of residence.

Personal data required to make transactions	Account data, information required for payment processing depending on the requirements of the payment processor (credit card information cardholder data, verification code generated by the card issuer, etc.), payout information (bank account information, other legal information imposed by the legislation of the country of residence);
Why do we process your data in this case?	We process your data in order to facilitate your transaction requests (art. 6/1/b of 2016/679 (EU) Regulation) and to fulfill our tax obligations in





	accordance with the relevant national tax legislation (Art. 6/1/c of 2016/679 (EU) Regulation);
With whom we may share your data	 IT service providers for our company like hosting and data storage (<u>Reflected Network LLC</u>); Providers to whom we outsource certain technical support services for our website or customer relationship management system providers (<u>Kayako Limited</u>); Payment processors (we work with <u>Paxum</u>, <u>Stripe</u> and Wire Transfer service provider); Regulators and other state authorities, if required by legal or statutory requirements;
How long we store the data	We will keep transaction data registered on your account until you decide to close your account, or until the automatic closing of the account in case five years have passed since your last login on your <u>Luive.com</u> account;
Where the data is stored	 The data registered through our website and applications will be stored on the hosting provider's servers located in EU; The data collected by Payment processors will be kept by them according to the policies and legal obligations to which they are subject to; The data we download locally will be stored on our secure, local and cloud servers.



office@decalex.ro

4. Completing the user profile

Once a user has activated an account on the **p**latform, he/she has the possibility to voluntarily complete the details of his/her profile, by adding information (Profile description, Birthday, Location), profile picture, or profile banner to personalize his/her account.

Personal data required to register and manage an account on our online platform	Account data, Profile description, Birthday, Location, profile picture, profile banner;
Why do we process your data in this case?	We process your data in order to pursue the user's legitimate interest to make their preferences, purposes, and ideals or to promote their developed and published content through their <u>Luive.com</u> account (Art. 6/1/f of 2016/679 (EU) Regulation);
	Face recognition: we use face recognition technology to recognize you in photos, videos and camera experiences;
With whom we may share your data	 IT service providers for our company like hosting and data storage (<u>Reflected Network LLC</u>); Providers to whom we outsource certain technical support services for our website or customer relationship management system providers (<u>Kayako Limited</u>); Regulators and other state authorities, if required by legal or statutory requirements;
How long we store the data	We will keep the data registered on your account until you decide to close it, or if more than five years have passed since the last login on the account;
Where the data is stored	The data registered through our website and applications will be stored on the hosting provider's servers located in EU;
	The data we download locally will be stored on our secure, local, and cloud servers;

5. Content publishing / report / review

All users can publish content, but only verified users can sell that content. Published content can consist of text, audio and video.

The content may contain personal data (name, picture, video recording of the user, voice, opinions, or other information which users voluntarily disclose).





The content you want to publish will first be subject to an evaluation process by our media content review department to ensure that it meets our terms and conditions or any applicable law. If the evaluation is favorable, the content will be published. Otherwise, it will be deleted.

This evaluation mechanism will also be applied if a user reports an already published content.

Keep in mind: you do not have the right to publish personal information you do not own. It is forbidden to publish, for example, pictures or video recordings of identifiable persons that did not give their explicit consent for this processing.

Personal data targeted by the publication of content / report / review	Name, picture, video recording of the user, voice, opinions, or other information which the user voluntarily makes publicly available;
Why do we process your data in this case?	We will process personal data associated with published content in order to assess whether it complies with our Terms and conditions (Art. 6/1/b of 2016/679 (EU) Regulation);
With whom we may share your data	 IT service providers for our company like hosting and data storage (<u>Reflected Network LLC</u>); Providers to whom we outsource certain technical support services for our website or customer relationship management system providers (<u>Kayako Limited</u>); Regulators and other state authorities, if required by legal or statutory requirements;
How long we store the data	We will keep the data registered on your account until you decide to close it, or more than five years have passed since your last login on the account;
Where the data is stored	The data registered through our website and applications will be stored on the hosting provider's servers located in the EU; The data we download locally will be stored on our secure servers.

6. User interaction

Interactions consist of waves, likes, shares, comments, subscriptions, gifts, tips, purchases of any kind or interaction via messenger.

We provide certain features that let you control who sees your post. Users have the option to block specific users.







Personal data concerned after interactions with other users or restrictions applied to them	User account, user location, IP;
Why do we process your data in this case?	We will process the data to facilitate several ways to interact with other users (Art. 6/1/b of 2016/679 (EU) Regulation) or to prevent unwanted users from interacting with you (Art. 6/1/f of 2016/679 (EU) Regulation);
With whom we may share your data	 IT service providers for our company like hosting and data storage (<u>Reflected Network LLC</u>); Providers to whom we outsource certain technical support services for our website or customer relationship management system providers (<u>Kayako Limited</u>); Regulators and other state authorities, if required by legal or statutory requirements.
How long we store the data	We will keep the data registered on your account until you decide to close it, if more than five years have passed since your last login on the account;
Where the data is stored	The data registered through our website and applications will be stored on the hosting provider's servers located in the EU;
	The data we download locally will be stored on our secure, local, and cloud servers.

7. Video streaming 1 to 1

<u>Luive.com</u> offers the possibility to make a video call where two users can interact using their live video streams and allowing them to gain or spend Luives (e.g. a lawyer who offers legal advice to a client).

You do not have to worry about privacy, the video broadcast will not be recorded!

Personal data involved in making a video call	User account, IP, Luives balance, personal data captured during the video call;
Why do we process your data in this case?	We will process the data to facilitate 1 to 1 video streaming between users (Art. 6/1/b of 2016/679 (EU) Regulation);
With whom we may share your data	 IT service providers for our company like hosting and data storage (<u>Reflected Network LLC</u>);





	 Providers to whom we outsource certain technical support services for our website or customer relationship management system providers (<u>Kayako Limited</u>); Video call service provider; Regulators and other state authorities, if required by legal or statutory requirements.
How long we store the data	The transfer of Luives will be registered on the accounts of the participants of the video call. This information will be available on your account until you decide to close it, or if more than five years since have passed since your last login on the account;
Where the data is stored	The data registered through our website and applications will be stored on the hosting provider's servers located in the EU;
	The data we download locally will be stored on our secure, local, and cloud servers.

8. Chat function

<u>Luive.com</u> allows a user to interact with another user by written, audio, video, or live video means.

Chats can be accessed only by verified or subscribed users.

Personal data involved in user interaction through the chat function	User account, IP, personal data transmitted voluntarily via the chat function;
Why do we process your data in this case?	We will process the data in order to pursue the user's legitimate interest to interact via chat function (Art. 6/1/f of 2016/679 (EU) Regulation);
With whom we may share your data	 IT service providers for our company like hosting and data storage (<u>Reflected Network LLC</u>); Providers to whom we outsource certain technical support services for our website or customer relationship management system providers (<u>Kayako Limited</u>); Regulators and other state authorities, if required by legal or statutory requirements;
How long we store the data	The written, audio, or video data transmitted via chat will be available on your account;



Where the data is stored	The data registered through our website and applications will be stored on the hosting provider's servers located in the EU;
	The data we download locally will be stored on our secure, local, and cloud servers.

9. Achievements

Luive.com offers achievements and rewards that allow you to have an exterior vault which enables you to store content when you reach a certain level of performance.

Levels are acquired by doing different actions, spending, or earning money, and they represent the level you have managed to reach since your account has been validated.

Personal data involved in receiving Achievements	User account, IP, user actions (Follows, Likes, Purchase content, Referrals, Subscribes, Upload paid content);
Why do we process your data in this case?	We will process the data in order to pursue the user's legitimate interest to receive rewards for his/her activity in <u>Luive.com</u> (Art. 6/1/f of 2016/679 (EU) Regulation);
With whom we may share your data	 IT service providers for our company like hosting and data storage (<u>Reflected Network LLC</u>); Providers to whom we outsource certain technical support services for our website or customer relationship management system providers (<u>Kayako Limited</u>); Regulators and other state authorities, if required by legal or statutory requirements;
How long we store the data	We will keep the data registered on your account until you decide to close it, or if more than five years have passed since your last login on the account;
Where the data is stored	The data registered through our website and applications will be stored on the hosting provider's servers located in the EU; The data we download locally will be stored on our secure, local, and cloud servers.

We will monitor and reward your activity on the platform by offering these achievements.



10. Lifetime referral

A referral is the amount of money you can earn by bringing people on the platform when sharing your referral link. Referrals are cumulative from all the people brought by you and represent 5% of the total Luives they buy and cash out on Luive.com.

Personal data involved in receiving Achievements	User account, IP, user actions (Follows, Likes, Purchase content, Referrals, Subscribes, Upload paid content);
Why do we process your data in this case?	We will process the data in order to pursue the user's legitimate interest to receive rewards for his/her activity in <u>Luive.com</u> (Art. 6/1/f of 2016/679 (EU) Regulation);
With whom we may share your data	 IT service providers for our company like hosting and data storage (<u>Reflected Network LLC</u>); Providers to whom we outsource certain technical support services for our website or customer relationship management system providers (<u>Kayako Limited</u>); Regulators and other state authorities, if required by legal or statutory requirements;
How long we store the data	We will keep the data registered on your account until you decide to close it. However, if no log-ins have been recorded during a 5 year period, your account will be deactivated and you will have to contact us at <u>support@luive.com</u> for reactivation;
Where the data is stored	The data registered through our website and applications will be stored on the hosting provider's servers located in the E.U; The data we download locally will be stored on our secure, local, and cloud servers;





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11. Administer prize draws and competitions

Occasionally, we will organize various contests for our platform users, through which they will have the opportunity to win some interesting prizes.

Usually, these campaigns/competitions, depending on the particular specifics, benefit from their own regulation or policy. Winners may be asked for additional details to take possession of the prizes.

Personal data required to administer prize draws and competitions	User account, IP, user activity during the contest;
Why do we process your data in this case?	We will process your data in order to pursue our legitimate interest to register you in the contest and to evaluate your activity during the contest (Art. 6/1/f of 2016/679 (EU) Regulation);
With whom we may share your data	 IT service providers for our company like hosting and data storage (<u>Reflected Network LLC</u>); Providers to whom we outsource certain technical support services for our website or customer relationship management system providers (<u>Kayako Limited</u>); Payment processors we work with (Paxum, Stripe, and Wire Transfer service provider); Regulators and other state authorities, if required by legal or statutory requirements;
How long we store the data	We will not keep the data of participants who were not winners longer than 12 months from the end of the contest/campaign; The data of the participants declared winners, in case we have the legal obligation to declare the respective prizes in accordance with the applicable fiscal legislation, will be kept for five years starting with the following financial year, in accordance with the applicable legal requirements;
Where the data is stored	The data registered through our website and applications will be stored on the hosting provider's servers located in the EU; The data we download locally will be stored on our secured servers.





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12. Technical support & user feedback

We will provide technical support to help you in any situation you report regarding the use of our platform.

We will use the situations you report us to improve the functionality of the platform and to respond better to user's needs, aiming to improve the user experience of our platform

Personal data required to necessary in the support process	User account, IP, user actions, the reported situation, data of other users involved, any other materials you willingly submit to us such as articles, images, feedback etc.;
Why do we process your data in this case?	We will process the data to facilitate technical support (Art. 6/1/b of 2016/679 (EU) Regulation); We will process the information about problems you encounter while using the website in order to pursue our legitimate interest to improve the functionality of our platform and the user experience (Art. 6/1/f of 2016/679 (EU) Regulation);
With whom we may share your data	 IT service providers for our company like hosting and data storage (<u>Reflected Network LLC</u>); Providers to whom we outsource certain technical support services for our website or customer relationship management system providers (<u>Kayako Limited</u>); Regulators and other state authorities, if required by legal or statutory requirements;
How long we store the data	We will keep the data registered on your account until you decide to close it.
Where the data is stored	The data registered through our website and applications will be stored on the hosting provider's servers located in the EU; The data collected by our customer relationship management system providers (Kayako Limited) will be kept by them according to the policies and legal obligations to which they are subject; The data we download locally will be stored on our secure, local, and cloud servers.



13. Monitoring user's activity

We will monitor your use of <u>Luive.com</u> and all the connections regarding it (content, messages, broadcasts on <u>Luive.com</u>)

<u>Luive.com</u> has internal software algorithms that detect any kind of abuse of content, such as downloading content, screenshots, or screen recordings. If any are flagged on your account, you will first receive a penalty, followed by your account being suspended and, in a later stage, account deactivation.

We will perform this monitoring to prevent:

- violation of terms and conditions
- abuse and malicious users
- violation of legal or statutory requirements.

Personal data required in security scans and monitoring process	User account, IP, user actions and all the related connections (content, messages, broadcasts on <u>Luive.com</u>), which inevitably involve the processing of personal data;
Why do we process your data in this case?	We will process the data in order to pursue our legitimate interest to protect our users, to prevent harm and to defend the interests and reputation of our company (Art. 6/1/f of 2016/679 (EU) Regulation);
With whom we may share your data	 IT service providers for our company like hosting and data storage (<u>Reflected Network LLC</u>); Providers to whom we outsource certain technical support services for our website or customer relationship management system providers (<u>Kayako Limited</u>); Regulators and other state authorities, if required by legal or statutory requirements;
How long we store the data	We will not keep personal data from security scans and monitoring processes unless violations of the terms and conditions or of the applicable legal provisions have been discovered. In these cases, we will keep the data until the incident is resolved or, if it could not be resolved / remedied, for at least 24 months in case we have to defend our interests in court or to recover costs, damages, and losses, including any direct or indirect losses of profit/reputation and all interests, penalties and legal fees that will be calculated on a full indemnity, and all other professional costs and expenses suffered or incurred in connection to the violation of our terms and conditions or the violation of legal or statutory requirements;
Where the data is stored	The data registered through our website and applications, will be stored on the hosting provider's servers located in the EU;



The data we download locally will be stored on our secure, local, and cloud
servers.

14. Commercial communications

We may send you information about the services we offer if requested (by e-mail, contact page, by subscribing to the newsletter, or through other available online channels).

If you are already registered on our platform, we may send you, to the extent permitted by law, occasional offers and inform you about new products, services, and other items that may be of interest to you.

Personal data required for marketing information	User account data, e-mail address;
Why do we process your data in this case?	 We process your data to take steps at the data subject's request before concluding a contract (Art. 6/1/b of 2016/679 (EU) Regulation) We process data based on consent (Art. 6/1/a of 2016/679 (EU) Regulation), for marketing communications. We will process the data in the legitimate interest if you are our client and we consider that the information could be of great interest to you (Art. 6/1/f of 2016/679 (EU) Regulation);
With whom we may share your data	 IT service providers for our company like hosting and data storage (<u>Reflected Network LLC</u>); Providers to whom we outsource certain technical support services for our website or customer relationship management system providers (<u>Kayako Limited</u>); Regulators and other state authorities, if required by legal or statutory requirements;
How long we store the data	 We will not keep communications older than one year from the last interaction; If you subscribe to the newsletter, data processing will continue until you request to unsubscribe; In the case of processing performed in the legitimate interest, when you are already our customer, we will continue to process your data for five years from your last login on the account;
Where data is stored	The data registered through our website and applications will be stored on the hosting provider's servers located in the EU; The data we download locally will be stored on our secure, local, and cloud servers.



Important:

If you no longer wish to receive newsletters or informational materials about our products or services, all you have to do is click the "Unsubscribe" button (or send us an email stating your wish to unsubscribe at support@Luive.com).

15. Luive notifications

We will notify you when other users interact with your <u>Luive.com</u> account (like, share, comment, subscription, gift, tip, purchases of any kind or interact via messenger).

We believe it is in your interest to receive this information, but because we respect our users' privacy, you may change your settings regarding Luive notifications any time.

Personal data required for Luive.com notifications	User account data, other users interact with your <u>Luive.com</u> account, e- mail address;
Why do we process your data in this case?	We will process the data to pursue our legitimate interest to inform you about the interaction of other users with your account (Art. 6/1/f of 2016/679 (EU) Regulation);
With whom we may share your data	 IT service providers for our company like hosting and data storage (Reflected Network LLC); Providers to whom we outsource certain technical support services for our website or customer relationship management system providers (Kayako Limited); Regulators and other state authorities, if required by legal or statutory requirements.
How long we store the data	We will keep sending you Luive notifications until you decide to unsubscribe, you decide to close your account or your account will be automatically closed due to the fact that 5 years have passed since your last login;
Where data is stored	The data registered through our website and applications will be stored on the hosting provider's servers located in the EU; The data we download locally will be stored on our secure, local, and cloud servers.



16. Technical support

We will provide technical support to help you in any situation you report regarding the use of our platform.

Personal data required to necessary in the support process	User account, IP, user actions, the reported situation, data of other users involved;
Why do we process your data in this case?	We will process the data to facilitate technical support (Art. 6/1/b of 2016/679 (EU) Regulation); We will process the data in order to pursue our legitimate interest to protect you from abuse and malicious users and to improve user experience (Art. 6/1/f of 2016/679 (EU) Regulation);
With whom we may share your data	 IT service providers for our company like hosting and data storage (<u>Reflected Network LLC</u>); Providers to whom we outsource certain technical support services for our website or customer relationship management system providers (<u>Kayako Limited</u>); Regulators and other state authorities, if required by legal or statutory requirements.
How long we store the data	We will keep the data registered on your account until you decide to close it, or it has been more than five years since the last login on the account;
Where the data is stored	The data registered through our website and applications will be stored on the hosting provider's servers located in the EU; The data collected by our customer relationship management system providers (<u>Kayako Limited</u>) will be kept by them according to the policies and legal obligations to which they are subject; The data we download locally will be stored on our secure, local, and cloud servers.

17. Facilitating an easy and pleasant navigation on our website

When you access our website, we collect your personal data through online identifiers (cookies and IP address).

The website automatically collects certain information and stores it in log files.



We use this information to design our website so that we can better adapt to our users' needs. We may also use your IP address to help diagnose problems with our servers, manage our website, analyze trends, track visitor movements, and collect general demographic information to identify visitor preferences.

You can find more information about cookies as well as how to delete cookies and deactivate tracking by accessing the Cookies Policy available on our website.

Personal data	Internet Protocol (IP), general location of the computer, device (country level), website viewing history, timestamp, request/action, browser type and version, language preferences and other statistics.
Why do we process your data in this case?	 We use cookies that make your browsing on our website easy and pleasant, pursuing our legitimate interest (Art. 6 / 1 / f GDPR); Non-essential cookies are not used without your consent (Art. 6 / 1 / a GDPR);
With whom we may share your data	 IT service providers for our company (hosting and data storage) or suppliers to which we outsource certain technical support services for our website; Social media platforms, search engines; Regulators and other state authorities, if required by legal or statutory requirements;
How long will we store the data	There are session cookies and persistent cookies. If the session ones are deleted when the browser is closed, the persistent ones may have a different lifespan, which differs depending on the role of the cookie; You may find more information about the lifespan of the cookies we use in our Cookies Policy;
Where data is stored	The data registered through our website and applications will be stored on the hosting provider's servers located in the EU; For third party cookies, the data is stored on servers located in the European Union. (e.g., Google or Facebook servers - Ireland for the third party);





Is the data processed by Luive.com safe?

We have implemented physical, electronic, and managerial security measures to protect and secure the information we collect and process. We have limited the access to your personal data to those employees, agents, contractors, and other third parties who have a business need to know. They will only process your personal data under our instructions, and they are subject to a duty of confidentiality.

Remember, however, that no data processing is guaranteed as 100% secure! If you suspect a breach of the confidentiality of your data, please contact us immediately at support@Luive.com.

Important: After the data retention period ends, your data will be deleted. We will continue to use this data only after its irreversible anonymization and only if we believe that this data could help us improve the quality of our products or services.

Links to other websites

Our Website contains links to other websites that are not owned or controlled by us. Please be aware that we are not responsible for the privacy practices of such other websites or third parties. We encourage you to be aware when you leave our Website and to read the privacy statements of each and every website that may collect your Personal Information.

International transfers of personal data

Some of our external third parties are based outside the European Economic Area ("EEA"), so the processing of your personal data may involve a transfer of data outside the EEA. We will ensure that all transfers occur in accordance with applicable data protection laws, including concluding data transfer contracts if necessary.

Any transfers of personal data to countries which do not benefit from an adequacy decision issued by the European Commission shall be made based on agreements using standard contractual terms adopted by the European Commission or other appropriate guarantees, under the applicable law.

To see the list of countries for which there is an adequacy decision, please check the following link <u>Adequacy protection – non-EU countries</u>



Processing data of minors

<u>Luive.com</u> is not intended and does not knowingly collect through the website information from children under 18. If we discover that a minor has used our website, we will delete all personal data about him/her.

Your rights

We have implemented measures to ensure that the rights of our users are respected, in accordance to the strictest data protection legislation currently in force, CCPA and GDPR.

a) California Consumer Privacy Act Notice

As of January 1, 2020, the California Consumer Privacy Act of 2018 ("CCPA") provides California residents ("Consumer(s)") certain rights with respect to their personal information, as this term is defined under the CCPA. In addition to the rights we state under this Policy and subject to the exceptions found under the CCPA, Consumers have the right to:

- Be informed of certain information concerning our collection and use of their personal information;
- Request that we delete certain personal information we collected from them;
- Appoint an agent to exercise their rights provided for by the CCPA, provided that a duly executed notarized power of attorney is presented and provided that the agent has information deemed sufficient to allow us to verify the identity of the Consumer in question and to locate his/her information in our systems;
- Not be subjected to discrimination for the exercise of these rights. We will not deny California residents the use of our service, neither will we provide a different level or quality of services for exercising any of their CCPA rights, unless as permitted under the CCPA.
- <u>This Platform does not sell personal information to third parties for monetary or other valuable</u> <u>considerations.</u>
- We may, however, disclose certain personal information with third parties, service providers, and entities, within our corporate group in order to enable them to perform certain services on our behalf, and namely to make the Website work properly. Regardless, we respect the California residents' right to exclude personal information from such sharing arrangements and to thereby opt-out of any future sale of their personal information.



b) EU General Data Protection Regulation 2016/679 (GDPR)

If the GDPR applies to you, as a data subject, you have specific legal rights concerning your personal data that we collect and process. **Luive** respects your rights and assures you that it takes due account of your interests.

- Withdrawal of consent: If the processing is carried out based on your consent, you can withdraw your consent for such processing at any time.
- **Rectification of data:** If you notice that we have erroneously processed your personal data, you can ask us to rectify that data at any time. We make reasonable efforts to keep personal data which are used continuously and, in our possession, or control accurate, complete, current, and relevant, based on the latest available information we have.
- **Restriction of processing:** If you are in one of the following situations, you can ask us to restrict the processing of your data:
 - You contest the correctness of personal data for the period in which we must verify the accuracy;
 - The processing is illegal, and you request the restriction of processing rather than personal data deletion;
 - We no longer need your personal data, but you request it for the establishment, exercise, or defense of a right; or
 - You object to the processing while we verify that our legitimate reasons take precedence of your rights
- Access to your data: You can ask us for information about the personal data we hold about you, including information about what categories of data, what they are used for, where we collected them from, if they are not collected directly from you and to whom they were disclosed (if any). You can obtain a copy from us, free of charge, containing the personal data we hold regarding you. We reserve the right to charge a reasonable fee for abusive requests.
- **Right to portability:** Upon request and where technically possible, we will transfer personal data to another operator if processing is necessary for the performance of a contract. Rather than receiving a copy of your personal data, you may request that we transfer your data directly to another operator specified by you.
- **Right of deletion:** You may obtain the deletion of personal data from us if:
 - \circ the data are no longer needed concerning the purposes for which they were processed;
 - you object to the further processing of personal data (see Right of Opposition below);
 - personal data have been processed illegally;
 - you withdraw your consent based on which the processing takes place;



Unless the processing is necessary:

- to fulfill a legal obligation that requires the processing of those data by us;
- in particular for the legal requirements regarding the deadlines for data retention;
- for the establishment, exercise, or defense of a right in court.
- **Right of opposition:** You can object any time to the processing of personal data due to the special situation in which you find yourself. In this case, we will no longer process personal data if we cannot prove a well-founded, legitimate reason, a major interest in the processing or the establishment, exercise, or defense of a right. When you object to the processing, please indicate whether you wish to delete personal data, or restrict the processing of such data.
- **Right to file a complaint:** In case of an alleged violation of the data protection legislation, you can file a complaint to the National Supervisory Authority for Personal Data Processing, by filling out the online form available at <u>Complaints ANSPDCP</u>.

Remember!

Time period: We will try to resolve your request within 30 days. However, the period may be extended for reasons regarding the specific legal aspects or the request's complexity.

Restricting access: In certain situations, we may not be able to grant you access to all or part of your personal data due to restrictions provided by law. If we refuse your access request, we will notify you on the reason of the refusal.

Impossibility of identification: In some cases, we may not be able to identify personal data due to the lack of identification elements provided in the application you sent us. In such cases, if you do not provide additional information to identify you, we will not be able to comply with your request to exercise your legal rights, as described in this section

Exercising your legal rights:

To exercise your legal rights, please contact our Data Protection Officer, in writing, at privacy@luive.com

Thank you for reading our privacy notice! We would appreciate if you can take a few minutes and leave <u>us</u> (fara) a feedback on how to improve this policy.

Last Updated: 24th of September 2021