

## Privacy Policy

**By using this Service, You agree to the terms outlined in this Privacy Policy. Please read it carefully.**

This Privacy Policy describes Our policies and procedures on the collection, use and disclosure of Your information when You use the Service and tells You about Your privacy rights and how the law protects You.

We use Your Personal data to provide and improve the Service. By using the Service, You agree to the collection and use of information in accordance with this Privacy Policy.

### **Cookies and Tracking Technologies**

We use cookies to enhance user experience and gather insights into how our website is used. Essential cookies are required for the website's functionality, while non-essential cookies are used for purposes such as analytics and personalized marketing. You have the right to manage your preferences and withdraw consent by adjusting the settings in our Cookie Settings page or revisiting the cookie banner at any time.

### **Interpretation and Definitions**

#### **Interpretation**

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

#### **Definitions**

For the purposes of this Privacy Policy:

**Account** means a unique account created for You to access our Service or parts of our Service.

**Affiliate** means an entity that controls, is controlled by or is under common control with a party, where "control" means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for election of directors or other managing authority.

**Company** (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to Smart Processes LLC, Tirane.

**Cookies** are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.

**Country** refers to: Albania

**Device** means any device that can access the Service such as a computer, a cellphone or a digital tablet.

**Personal Data** is any information that relates to an identified or identifiable individual.

**Service** refers to the Website.

**Service Provider** means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used.

**Usage Data** refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

**Website** refers to Smart Processes, accessible from <https://smartprocesses.net>

**You** means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

## Collecting and Using Your Personal Data

### Types of Data Collected

#### *Personal Data*

While using Our Service, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Usage Data
- Payment Information

#### *Usage Data*

Usage Data is collected automatically when using the Service.

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device.

## Use of Your Personal Data

The Company may use Personal Data for the following purposes:

**To provide and maintain our Service,** including to monitor the usage of our Service.

**To manage Your Account:** to manage Your registration as a user of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.

**For the performance of a contract:** the development, compliance and undertaking of the purchase contract for the products, items or services You have purchased or of any other contract with Us through the Service.

**To contact You:** To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.

**To provide You** with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless You have opted not to receive such information.

**To manage Your requests:** To attend and manage Your requests to Us.

**For business transfers:** We may use Your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Us about our Service users is among the assets transferred.

**For other purposes:** We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Service, products, services, marketing and your experience.

We may share Your personal information in the following situations:

- **With Service Providers:** We may share Your personal information with Service Providers to monitor and analyze the use of our Service, to contact You.
- **For business transfers:** We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company.
- **With Affiliates:** We may share Your information with Our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.
- **With business partners:** We may share Your information with Our business partners to offer You certain products, services or promotions.

- **With other users:** when You share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside.
- **With Your consent:** We may disclose Your personal information for any other purpose with Your consent.

### **Payments and Subscriptions**

After the one-month free trial period, users will be required to make payments to continue using the services offered on our website. Payments will be processed through PayPal, a secure and trusted third-party payment service provider. By choosing to make a payment via PayPal, users agree to PayPal's terms and conditions. We collect only the necessary payment information to process your subscription, and we do not store your full payment details. For recurring payments, you will be billed according to the subscription plan you select. You may manage your payment preferences, including cancellations, directly through your PayPal account.

### **Retention of Your Personal Data**

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

Personal data will be retained for as long as necessary to fulfill the purposes outlined in this Privacy Policy, after which it will be securely deleted.

### **Transfer of Your Personal Data**

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

### **Access of Your Personal Data**

You have the right to request confirmation from Us regarding the processing of your Personal Data. If we are processing your data, You may request access to be provided with specific information.

### **Right to Rectification**

You have the right to request the correction of any inaccurate or incomplete Personal Data that We hold about You.

You may update or amend Your information at any time by signing in to Your Account (if applicable) and visiting the account settings section. Alternatively, You can contact Us directly to request corrections to any Personal Data that You believe is incorrect or incomplete.

Please note that We may need to verify the information before making any changes.

### **Right to Restriction of Processing**

You have the right to request the restriction of processing of your Personal Data in certain circumstances, such as when you contest the accuracy of your data or when the processing is unlawful but you prefer to limit its use rather than erase it.

If you request a restriction, We will retain your Personal Data but will no longer process it unless required by law or to protect the rights of others.

You can contact Us directly to request the restriction of processing of your Personal Data. We will notify you before lifting any restriction placed on your data.

### **Delete Your Personal Data**

You have the right to delete or request that We assist in deleting the Personal Data that We have collected about You.

Our Service may give You the ability to delete certain information about You from within the Service.

You may update, amend, or delete Your information at any time by signing in to Your Account, if you have one, and visiting the account settings section that allows you to manage Your personal information. You may also contact Us to request access to, correct, or delete any personal information that You have provided to Us.

Please note, however, that We may need to retain certain information when we have a legal obligation or lawful basis to do so.

## Right to Object

You have the right to object to the processing of your Personal Data, where we are relying on legitimate interests as the legal basis for processing. If you object, we will stop processing your data unless we can demonstrate compelling legitimate grounds for continuing the processing that override your interests, rights, and freedoms.

You also have the right to object to the processing of your Personal Data for direct marketing purposes. If you object to such processing, we will stop using your data for marketing.

To object to the processing of your personal data, please email us at [info@smartprocesses.net](mailto:info@smartprocesses.net) on our website."

If you wish to stop receiving marketing communications from us, simply click on the 'unsubscribe' link in any of our emails, or contact us directly to update your preferences.

## Disclosure of Your Personal Data

### *Business Transactions*

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

Your personal data may be transferred to and processed in countries outside of your country of residence, including those that may not have the same level of data protection laws. We will take appropriate measures to ensure that your personal data is protected in accordance with applicable data protection laws, including the use of EU Standard Contractual Clauses or similar safeguards.

If you have concerns about how your personal data is being transferred internationally, you have the right to request further information regarding the safeguards we have in place. You can contact us using the details provided in this Privacy Policy.

### *Law enforcement*

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

### *Other legal requirements*

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public

- Protect against legal liability

### **Security of Your Personal Data**

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

### **Detailed Information on the Processing of Your Personal Data**

The Service Providers We use may have access to Your Personal Data. These third-party vendors collect, store, use, process and transfer information about Your activity on Our Service in accordance with their Privacy Policies.

### **Usage, Performance and Miscellaneous**

We may use third-party Service Providers to maintain and improve our Service.

#### **Google Places**

Google Places is a service that returns information about places using HTTP requests. It is operated by Google

Google Places service may collect information from You and from Your Device for security purposes.

The information gathered by Google Places is held in accordance with the Privacy Policy of Google: <https://www.google.com/intl/en/policies/privacy/>

### **Children's Privacy**

Our Service does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 13 without verification of parental consent, We take steps to remove that information from Our servers.

If We need to rely on consent as a legal basis for processing Your information and Your country requires consent from a parent, We may require Your parent's consent before We collect and use that information.

### **Links to Other Websites**

Our Service may contain links to other websites that are not operated by Us. If You click on a third party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

### **Changes to this Privacy Policy**

We may update this Privacy Policy from time to time. When we do, we will inform you by:

1. Sending an email notification (if you have an account with us).
2. Displaying a prominent notice on our website or app (such as a pop-up notification or banner).
3. Updating the 'Last Updated' date at the top of this policy."

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

**By accessing or using our Service, You confirm that You have read and understood this Privacy Policy. You explicitly consent to the collection, use, and processing of Your personal data as outlined in this Privacy Policy. To proceed, please click the checkbox below to acknowledge your consent to the terms of this Privacy Policy."**

- **I agree to the Privacy Policy and consent to the processing of my personal data.**

### **Contact Us**

In accordance with the General Data Protection Regulation (GDPR), We have assessed whether the appointment of a Data Protection Officer (DPO) is required. Based on the scope of our data processing activities, we have determined that the appointment of a DPO is not necessary.

If you have any questions about this Privacy Policy, You can contact us:

- By email: [info@smartprocesses.net](mailto:info@smartprocesses.net)