Windocks Privacy Policy May 1, 2019

Nirvaha Inc., doing business as Windocks, (collectively “Windocks”) respect the privacy of its online users of its websites, products and services, including communication services, (collectively, the “Services”). We recognize the importance of protecting information collected from our users and have adopted this Privacy Policy to inform you about how we gather, use, process, store and disclose your information, including personal information, in conjunction with your access and use of our Services.

By using our Services, you confirm that you have agreed to our Terms of Service and read and understood this Privacy Policy. We will not share your personally identifiable information except as described herein.

1. TYPES OF INFORMATION WE COLLECT

We collect two basic types of information – personal information and anonymous information – and we may use personal and anonymous information to create a third type of information, aggregate information. Personal Information means information that identifies (whether directly or indirectly) a particular individual, such as the individual’s first and last name, postal address, e-mail address and/or telephone number. Anonymous Information means information that does not directly or indirectly identify, and cannot reasonably be used to identify, an individual (including an individual’s computing device). Aggregate Information means information about groups or categories of individuals which does not identify and cannot reasonably be used to identify an individual. We may share Aggregate and Anonymous Information with other parties without restriction.

We collect the following categories of information:

- Registration information you provide when you create an account, which may include personal data such as: your first name and surname, country of residence, gender, date of birth, e-mail address, username and password.
- Transaction information you provide when you request information or purchase a product or service from us, whether on our sites or through our applications, including identification information (copy of valid passport or government-issued photo identification document, if provided to Windocks), your date of birth, your postal and/or residential address, telephone number and payment information. If you conduct transactions, we may collect and retain some or all of the information related to these transactions, including transaction amount(s), parties involved, time and manner of exchange, and other transaction circumstances, such as payment method and names or emails of external third-party accounts.
- Information sent either one-to-one or within a limited group using our message, chat, post or similar functionality, where we are permitted by law to collect this information.
- Content, communications and other information you provide to us, view or engage with when you use our sites and applications, our applications on third-party sites or platforms (such as social networking sites) or link your profile from a third-party site or platform to your registered account. We collect information about how you use our Services, such as
the types of content you view or engage with, the features you use, the actions you take, the people or accounts you interact with, and the time, frequency and duration of your activities.

- Location information when you visit our sites or use our applications, including location information either provided by a mobile device interacting with one of our sites or applications, or associated with your internet protocol (IP) address, where we are permitted by law to process this information.
- Usage, viewing and technical data, including your device identifier and features, IP address, web pages you visited prior to coming to our sites, proxy server, operating system, web browser and add-ons, internet service provider or your mobile carrier, and third-party user handles associated with your account when you visit our sites, use our applications on third-party sites or platforms, or open e-mails that we send. We use log-ins, cookies, device information and IP addresses to identify you and log your use.
- Your marketing preferences.
- Information you share with us in connection with surveys, contents or promotions.
- Communications that you send to us, such as customer support inquiries or other inquiries related to your account.

Additionally, there are a few special circumstances to note:

- Intellectual Property Claim Notices: If you notify us of an intellectual property claim, the information in your claim notice may be shared with other parties to the disagreement or third parties in our discretion and as required by law;
- Beta Service User: If you volunteer to serve as a beta participant for our pre-commercial content, we may track bug reports and individual system performance in an effort to test our technology rigorously before it is deployed;
- Former Customer: If you discontinue your use of our Service, we may keep your registration file in our database for use in the event that you elect to renew your use of our Service, as well as for anti-fraud and other such protective measures.

2. HOW WE COLLECT YOUR INFORMATION

We collect information you provide directly to us when you request products, services or information from us, register with us, participate in public forums or other activities on our sites and applications, respond to customer inquiries or surveys, or otherwise interact with us. We also record some of this information automatically when you use our Services. We also may receive some of this information from third parties.

- We collect the types of information as outlined in Section 1 and when you visit our sites or applications, when you register and manage your account, when you use our Services, when you purchase a product or services from us, when you post to public forums or chats, if you send us support inquiries, intellectual property claims or other claims, complaints or inquiries, when you participate in contents or promotions, or when we ask you for information for contractual or legal reasons.
- We collect information through technology, such as cookies and other technologies (such as web beacons and pixel tags), including when you visit our sites and applications or use
our applications on third-party sites or platforms. A cookie is a small string of data which often includes an anonymous unique identifier sent to your Internet browser from a website’s computers, which is stored on your computer’s hard drive and is used to customize your use of a product or online site, keep records of your access to an online site or product, or store information needed by you on a regular basis (e.g. password retention functionality). Windocks (itself or through third parties acting on our behalf) use cookies for a number of purposes relating to our websites, applications and services, including to access your account information where you “login” to our websites, forums or other areas and to keep track of your website session data. You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is set. Each browser is different, so consult the “Help” menu of your browser to learn how you change your cookie preferences. Please note that if you reject all cookies, you may not be able to use certain of our (or other companies’) web pages.

- We acquire information from other trusted sources to update or supplement the information you provided or we collected automatically. Local law may require that you authorize the third party to share your information with us before we can acquire it.

Please keep in mind that when you provide information to us on a third-party site or platform (for example, through our applications), the information you provide may be separately collected by the third-party site or platform. The information we collect is covered by this Privacy Policy and the information that the third-party site or platform collects is subject to the third-party site or platform’s privacy practices. Privacy choices you have made on the third-party site or platform will not apply to our use of the information we have collected directly through our applications.

3. USE OF YOUR INFORMATION BY WINDOCKS

Windocks will be the data controller for your information for the following purposes:

- Provide you with the products and services you request, such as create and manage your account, process payments, send your emails or other communications about your transactions and Service-related announcements, provide you with customized services based on your preferences
- Communicate with you about your account or transactions with us and send you information about features on our sites and applications or changes to our policies
- Consistent with local law and choices and controls that may be available to you:
  - Send you offers and promotions for our products and services or, as permitted, third-party products and services
  - Personalize content and experiences on our sites and applications
  - Provide you with advertising based on your activity on our sites and applications and on third-party sites and applications
  - Administer surveys, contest or promotions
- Optimize or improve our products, services and operations
- Detect, investigate and prevent activities that may violate our policies (including our Terms of Service) or be illegal, including law enforcement requests
• Verify accounts and monitor activities within our Services to promote safety and security of our Services
• Comply with applicable laws and regulations, including regulation related to money services business (by Tilia Inc., for example)
• Develop, test, evaluate and improve our Services
• Respond to your inquiries or concerns.

Windocks uses cookies to perform authentication of your account, show you accurate information, personalize your experience (including communication preferences, features and customized content), enable and support our security features, help us detect malicious activity, conduct marketing campaigns and track their performance, and improve our services.

Except under certain limited circumstances as set forth here and in our Terms of Service, Windocks does not disclose to third parties the Personal Information or other account-related information that you provide to us without your permission. You understand, however, that Windocks may disclose your Personal Information or other account-related information under the following circumstances:

• If we believe in good faith that such disclosure is necessary under applicable law, or to comply with legal process served on Windocks;
• In order to protect and defend the rights or interests of Windocks, its products and services, and/or the other users of such products and services;
• In order to report to law enforcement authorities, or assist in their investigation of suspected illegal or wrongful activity, or to report any instance in which we believe a person may be in danger;
• To other third parties (a) to provide you with services you have requested, (b) to offer you information about our products or services (e.g. events or features), or (c) to whom you explicitly ask us to send your information (or about whom you are otherwise explicitly notified and consent to when using a specific service). For instance, we may provide certain information to our payment processor, to credit card associations, banks or issuers (if you are using a credit card), to PayPal (if you are using a PayPal account), or to providers of other services you request. If you choose to use these third parties’ products or services, then their use of your information is governed by their privacy policies. You should evaluate the practices of third party providers before deciding to use their services; and
• To other business entities, should we plan to merge with or be acquired by that business entity.

4. SHARING YOUR INFORMATION WITH OTHER COMPANIES

We will not share your Personal Information outside of Windocks except in limited circumstances, including:

• When you allow us to share your Personal Information with another company, such as:
  o Directing us to share your Personal Information with third-party sites or platforms, such as social networking sites
Please note that once we share your Personal Information with another company, the information received by the other company becomes subject to the other company’s privacy practices.

- When companies perform services on our behalf, however, these companies are prohibited from using your Personal Information for purposes other than those requested by us or required by law;
- When we share, assign or otherwise transfer Personal Information with third parties in connection with the sale of any of our products, services, assets and/or businesses, or when the ownership or control of all or part of our Services changes;
- When we share Personal Information with third parties to enforce our Terms of Service or rules, to ensure the safety and security of our users and third parties, to comply with law enforcement or other legal process or in other cases if we believe in good faith that disclosure is required by law.

5. YOUR CONTROLS, RIGHTS AND CHOICES

5.1 Data Retention

We retain your Personal Information while each of your accounts is in existence or as needed to provide you with Services. We also retain your Personal Information for as long as necessary to achieve the purposes described in this Privacy Policy, for example, to comply with our legal obligations. If required by law or if the information is subject of a legal request or governmental investigation, we retain certain financial transaction information and Personal Information for as long as we are required to comply with applicable laws, regulations or such legal process or investigation. We also retain Personal information in order to protect our and other’s rights, resolve disputes or enforce our legal terms or polices, to the extent permitted under applicable law.

5.2 Right to Access and Control your Personal Information

We provide you with the ability to exercise certain controls, rights and choices regarding our collection, use, process, store and sharing of your information. Individuals located in certain countries, including the European Economic Area, have certain statutory rights in relation to their personal data. In accordance with applicable law and subject to any exemptions provided by law, your controls, rights and choices may include:

- Correct or Update: You may correct or update your account registration or your Personal Information or you may also ask us to change or update your data in certain cases, particularly if it is inaccurate;
- Delete: You may delete your account registration or ask us to erase or delete all or some your Personal Information (for example, if it is no longer necessary to provide Services to you);
- Object to, Limit or Restrict use of Personal Data: You may ask us to stop using all or some your Personal Information (for example if we have no legal right to keep using it) or to limit our use of it (for example, of your Personal Information is inaccurate or unlawfully held);
You may change your choices for subscriptions, newsletters and alerts;
You may choose whether to receive offers and promotions, or other marketing, from us for our products and services, or products and services that we think may be of interest to you, and you have a right to object to Windocks use of your Personal Information for this purpose at any time;
You may choose whether to share your Personal Information with other companies so they can send you offers and promotions about their products and services;
You may choose whether to receive targeted advertising from many ad networks, data exchanges, marketing analytics and other service providers by following the directions set forth above in Section 2;
Right to Access and/or Take Your Data: You may request access to the Personal Information we hold about you and you may ask for a copy of your Personal Information in machine-readable form.

You may exercise your controls, rights and choices, or request access to your Personal Information, by modifying your selections on your account preferences page, following unsubscribe instructions provided in communications we send to you, or sending correspondence regarding your request(s) or the publications or services you no longer wish to receive from us to the following address:

Windocks
Attention: Privacy
1130 140th Ave NE, Suite 100C
Bellevue, WA 98005

We will consider your request in accordance with applicable laws. Please note that, for technical reasons, there is likely to be a delay in deleting your Personal Information from our systems if you ask us to delete it. Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted on our sites or that we have, and that there may be circumstances in which the law does not require or allow removal even if requested. Please be aware that if you do not allow us to collect Personal Information from you, we may not be able to deliver certain products and services to you, and some of our Services may not be able to take account of your interests and preferences.

You may have the right to lodge a complaint with a competent supervisory authority, subject to applicable law.

5.3 Account Closure

You may close your account by contacting us at support@windocks.com. If you choose to close your Windocks account, we retain information for the purposes set out in this Privacy Policy and as noted below.

We retain your Personal Information even after you have closed your account if reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, respond to government investigations, maintain
security, prevent fraud and abuse, enforce our Terms of Service or other terms or policies, and protect our and other’s rights. We will retain Anonymous Information and Aggregate Information after your account has been closed. As we do not control data you shared with others, such data will remain visible or accessible.

6. DATA TRANSFERS, SECURITY AND LAWFUL BASIS FOR PROCESSING

6.1 Cross Border Data Transfers

We operate globally and may transfer your information or Personal Information to individual companies of Windocks or third parties in locations around the world for the purposes described in this Privacy Policy. If you are located in the European Union or other regions with laws governing data collection and use that may differ from U.S. law, please note that your information may be transferred to a country or jurisdiction that does not have the same data protection laws as your jurisdiction and you consent to the: (1) transfer of information to the U.S. or any other country in which Windocks or its subsidiaries, affiliates or service providers maintain facilities; and (2) the use and disclosure of information about you as described in this Privacy Policy. Whenever your Personal Information is transferred, stored or processed by us, we will take reasonable steps to safeguard the privacy of your Personal Information in accordance with applicable law.

7.2 Security

We implement technical, physical and organizational security safeguards designed to protect your data, from loss, misuse and unauthorized access and disclosure. We regularly monitor our systems for possible vulnerabilities and attacks. However, given the nature of electronic communications and information processing technologies, we cannot guarantee the security or safety of any information that is send to us, transmitted through the Internet or stored on our systems. There is no guarantee that data may not be accessed, disclosed, altered, or destroyed by breach by others of any of our physical, technical, or organizational safeguards. In the event that Personal Information is compromised due to a breach of security, Windocks will promptly notify our users in compliance with applicable law.

7.3 Lawful Basis for Processing

We will collect, use, process and store your Personal Information where we have a valid lawful basis. Our lawful bases include one or more of the following:

- Consent (you have given Windocks consent, which you can change at anytime);
- Performance of a contract (our processing is necessary for the performance of a contract we have with you to deliver the Services you have requested, to respond to your inquiries or to take specific steps before entering into a contract with you);
- Legal obligation (processing is necessary for Windocks to comply with laws, regulations and regulatory authorities, court orders or law enforcement requests);
- Vital Interest (processing is necessary to protect your vital interests or vital interests of another person);
• Legitimate interest (improve our business or customer relationships, marketing and advertising, resolve disputes, prevent fraud and abuse, analyze and improve safety and security of our Services, enforce our Terms of Service, to anonymize and subsequently use the information).

8. CHANGES TO THIS PRIVACY POLICY

From time to time, we may change this Privacy Policy to accommodate new technologies, industry practices, regulatory requirements or for other purposes. We will provide notice to you through our Services if these changes are material and, where required by applicable law, we will obtain your consent. If you object to any changes, you may close your account. You acknowledge that your continued use of our Service after we publish or send a notice about our changes to this Privacy Policy means that the collection, use and sharing of your personal data is subject to the updated Privacy Policy.

9. COMMENTS AND QUESTIONS

If you have a comment or question about this Privacy Policy or our privacy practices, please send an e-mail to support@windocks.com or write us:

Windocks
Attention: Privacy
1130 140th Ave NE, Suite 100C
Bellevue, WA 98005

NOTICE TO CALIFORNIA RESIDENTS:

If you are a California resident, California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your Personal Information by Windocks to third parties for the third parties’ direct marketing purposes. With respect to these entities, this Privacy Policy applies only to their activities within the State of California. To make such a request, please send an e-mail to privacy@windocks.com or write us at the address listed immediately above.