



PRIVACY POLICY

This privacy policy describes the practices and processes that Rookeries Development Corp (hereinafter Rookeries, we, us) for the use and possible disclosure of the personal data that Rookeries process and collects from its clients, client's end user, and from all those visitors (hereinafter "user" "you" "your").

In this Privacy Policy, "ROOK " refers to our website, our application, and the products and services offered through our website and application. References to "personal information" might include "personal health information".

This privacy policy forms part of the terms and conditions established for your acknowledgment and acceptance. By visiting our website and using ROOK, you provide your consent and agree to the processing and collection of personal data in a lawful and fair manner.

The purpose of the collection, use, and disclosure of your personal data is the provision and improvement of the services as well as the options you have referent to our data practices.

Users in different regions of the world might be subject to different data protection standards, if you are accessing our services from a different country with specific laws governing collection, use, and disclosure of data, please be informed that all your personal data is stored in Amazon Web Services in the United States of America, the data may be transmitted to our service providers supporting our business operators and to our business associates, in accordance with the applicable laws and regulations.

Our commitment is to safeguard your personal data by treating it in accordance with this privacy policy. Rookeries has appropriate measures for the security and protection of your personal information in its collection, storage and transmission of it. We take care of your data with the same treatment as if it was ours.

DEFINITIONS

- **PERSONAL INFORMATION.** It is all the data that identifies an individual.
- **SERVICES.** Are all the utilities and/or functions of the Rookconnect product that Rookeries makes available to you, including the site/web page and application.
- **SITE / WEB PAGE.** It is the web domain, owned by Rookeries, that displays all the information relevant to the RookConnect service.
- **APP (APPLICATION).** It is the portal available to Clients for purposes of testing (SandBox) and Production
- **COOKIES.** These are small blocks of data created by a web server while a user is browsing a website and placed on the user's computer or other device by the user's web browser.
- **BUSINESS ASSOCIATES.** is a person or entity that performs certain functions or activities that involve the use or disclosure of personal information on behalf of, or provides services to Rookeries.
- **THIRD PARTIES.** Service providers, business associates, and some third-party providers to whom you may give us the authorization to share the use of your personal information for the purposes that suit you

INFORMATION ROOKERIES COLLECT AND PROCESS

ROOK strictly limits the collection of personal data to only the information that is necessary to perform and provide services or fulfill a direct business need. We adhere to the principle of data minimization, ensuring that only the minimum amount of personal data required is collected and processed.

When collecting personal data, we strive to be transparent about the purposes for which the data is being collected and how it will be used.

ROOK might collect the following types of personal data: cookies, usage data, email address, phone number, first name, last name, province, state, country, ZIP/Postal code, city, address, and company name for clients and for end user might collect gender, age, birth date, address, city, country, and health and wellness metrics.

Certain data may be mandatory for the use of ROOK, while other data may be optional. When data is mandatory, it is clearly indicated throughout ROOK. Users are free to

choose not to provide optional data without any impact on the availability or functionality of the service. If you have any questions about which personal data is mandatory, please contact us using the contact information provided in this privacy notice.

ROOK applications may collect personal data that users provide voluntarily or collect usage data while using the website and supporting applications.

Furthermore, ROOK may use cookies and other tracking technologies to enhance the user experience and provide specific functionalities. Please refer to the Cookie Policy below for more information.

1. PERSONAL DATA OF SITE USERS.

We may request personal information (e-mail, name, company, among other possibles) from you, who are a visitor to our site in the cases of forms such as "contact us", in participation and sending of surveys, events, etc. This information also allows Us to contact you or identify you.

2. PERSONAL DATA

A. PROCESSING AND USE

The personal data we process and collect may be used (illustrative but not limiting) for the following purposes:

- Providing Services: Personal data is collected to enable ROOK to provide its services.
- Analysis: Personal data is used to monitor and analyze web traffic and the behavior of any type of user on ROOK, it is also used to create statistical studies, data analysis, metrics, identification of usage trends, service evaluation, marketing, insight, and projections.
- User Database Management: Personal data is managed to create user profiles, track user activities, and improve ROOK.
- Managing Contacts and Sending Messages: Personal data is used to manage contact lists and send communications to users.
- Handling Payments: Personal data is processed to facilitate payment transactions and related communications.

- **Displaying Content from External Platforms:** Personal data is used to display external content and enable interaction with it.
- **Hosting and Back-End Infrastructure:** Personal data is processed and stored on hosting and back-end infrastructure to support the operation of ROOK.
- **Interaction with Live Chat Platforms:** Personal data is used to facilitate communication with users through live chat platforms.
- **Spam Protection:** Personal data is analyzed to filter spam traffic and protect against spam.
- **Contacting the User:** Personal data is processed to respond to user requests and inquiries.
- **Remarketing and Behavioral Targeting:** Personal data is used for remarketing and behavioral targeting purposes to display targeted advertisements.
- **Selling Goods and Services Online:** Personal data is processed for the provision of services or goods, including payment processing and delivery.
- **Authentication:** To authenticate the user, this is necessary to provide access to the services
- **Engagement:** To perform a contract or any type of agreement for the provision of the services with the User.

B. SHARING AND DISCLOSURE

Rookeries may share and disclose personal data for our legal business purposes

- With Service Providers who help us monitor and analyze the use of our service, to fulfill business operations or certain services. With storage, hosting, and hosting providers such as Amazon Web Services (you can check his privacy policy). With marketing, advertising, and email communications providers such as Mailjet (you can check their privacy policy)
- For business transfers: We may use your information to evaluate or conduct a merger, sale, restructuring, reorganization, dissolution, or another sale or transfer of some or all of our assets, whether as a going concern or as part of a bankruptcy, liquidation or similar proceeding, in which Personal Data we hold about users of our Service is among the transferred assets.
- With business associates in order to conduct research, analysis, statistics and provide anonymized, dissociated or de-identified data for them, or/and provide services, offers, or products

- For legal requirements. When required by law or any judicial authority, to comply with legal obligations, to defend our intellectual property rights, to protect your personal security within the site, and protection and defense against any legal claim, always assuming the commitment to only disclose it in extreme necessity and in good faith.

C. MODE, PLACE, AND METHODS OF PROCESSING THE DATA

Personal data is processed using computers and technology-enabled tools in accordance with organizational policies and procedures related to the stated purposes. In certain cases, personal data may be accessible to ROOK employees involved in the operation of the ROOK website, application, and supporting applications. External parties, such as third-party technical service providers, hosting providers, and IT companies, may also have access to personal data as data processors or sub-processors appointed by ROOK.

D. LEGAL BASIS OF PROCESSING

ROOK may process personal data when one of the following legal bases applies:

Consent: Processing is based on the user's consent for one or more specific purposes.

Performance of a Contract: Processing is necessary for the performance of a contract between ROOK and the user.

Legal Obligation: Processing is necessary to comply with a legal obligation.

Legitimate Interests: Processing is necessary for the legitimate interests pursued by ROOK or a third party.

The specific legal basis for processing personal data will be provided upon request, including whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

E. PLACE

Data is primarily processed at ROOK's operating offices and hosting facilities, located in the United States of America. However, some data may be stored and processed in the European Union through third-party sub-processors. Data transfers may involve transmitting user data to a country outside its own jurisdiction.

F. RETENTION

Rookeries will keep your data for as long as it is necessary for compliance with this privacy policy, for the commercial purposes to which we have complied and by the required provision of the law in legal, fiscal, accounting, or other matters.

We will retain your marketing or advertising preferences for as long as you allow us to continue to have that type of communication with you. Remember that there is always a method to opt-out of receiving these notifications.

We may retain information that will no longer be identified as personal data because it will be anonymized, dissociated, or de-identified so that it can no longer be associated with you.

G. TRANSFER

The information, including personal data, may be transferred outside the area, city, country or continent where you reside to be processed in the operating offices of Rookeries and therefore the applicable data protection law may differ from the one that applies in your jurisdiction.

The acceptance of this privacy policy, the access and use of this site as well as the contracting of the services infer your agreement to this transmission.

H. DELETE.

You have the right, at any time, to modify, update or delete your information or personal data, or to request our assistance in order to carry out these actions, provided that we do not have a legal basis not to do so in its entirety.

I. SECURITY

Rookeries always seeks to be at the forefront of technology to provide you with the greatest protection for your information and that of your personal data, but you are aware that there is no 100% secure method or error-free of storage, hosting, transmission and data processing in internet or via e-mail, therefore, Rookeries cannot guarantee absolute security, but we will always be committed to making reasonable efforts to protect your data from loss, misuse and unauthorized access, disclosure, alteration or destruction as if it were our own.

We follow industry best practices and standards to ensure the confidentiality, integrity, and availability of your data. Our security measures include but are not limited to:

- Encryption: We employ encryption techniques to safeguard your data during transmission and storage.
- Access Control: We restrict access to personal data to authorized personnel only, ensuring that it is accessible on a need-to-know basis.
- Regular Audits: We conduct regular security audits and assessments to identify and address any vulnerabilities or risks.
- Employee Training: Our employees undergo comprehensive data protection training to ensure they understand the importance of data security and privacy.

We are committed to continuously enhancing our security practices and staying up to date with the latest industry standards to provide a secure environment for your personal data.

While we strive to protect your personal data, no method of transmission or storage is 100% secure. Therefore, we cannot guarantee absolute security. If you have any concerns about the security of your data, please contact us using the contact information provided in this privacy notice.

CROSS BORDER TRANSFER

Understanding the implications and the importance of data privacy, ROOK is taking a proactive approach by involving legal professionals to ensure compliance with relevant international regulations. This reflects a commitment to transparent and lawful data management practices, demonstrating a responsible handling of sensitive information and a dedication to upholding the standards set by international security and privacy laws, even when dealing with data process, storage, or disclosure in the United States.

This privacy policy is attached to the practices regulated by data protection laws such as the HIPAA (HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT), GDPR (GENERAL DATA PROTECTION REGULATION), FEDERAL LAW OF PROTECTION OF DATA IN POSSESSION OF INDIVIDUALS, and other international compliance treaties.

THE RIGHTS OF USERS

Users have the following rights regarding their personal data processed by ROOK:

1. Right to Withdraw Consent: Users have the right to withdraw their consent to the processing of their personal data at any time.
2. Right to Object: Users can object to the processing of their personal data based on legitimate interests or for direct marketing purposes.
3. Right of Access: Users can request access to their personal data and obtain information about the processing activities.
4. Right to Rectification: Users can request the correction or update of inaccurate or incomplete personal data.
5. Right to Restrict Processing: Users have the right to restrict the processing of their personal data under certain circumstances.
6. Right to Erasure: Users can request the erasure of their personal data, subject to legal obligations or overriding legitimate grounds.
7. Right to Data Portability: Users can request to receive their personal data in a structured, commonly used, and machine-readable format, and transmit it to another data controller.
8. Right to Lodge a Complaint: Users have the right to lodge a complaint with a data protection authority regarding the processing of their personal data.

To exercise these rights or obtain further information, users can contact ROOK using the contact details provided in this document.

AUTOMATED DECISION MAKING

In accordance with data privacy laws, we prioritize transparency and respect for user rights, particularly in matters concerning automated decision-making processes. We understand the significance of these processes in modern technology, and we are committed to upholding the rights of our users. Our privacy policy ensures that any automated decision-making, including profiling, is conducted responsibly and ethically, with full consideration of the rights and interests of individuals. We strive to provide clear information about how automated decisions are made, the criteria used, and the potential consequences for users. Moreover, we offer mechanisms for users to challenge these decisions, request human intervention, and express their preferences.

Our goal is to empower users with control over their personal data and ensure that automated decision-making aligns with their privacy rights and expectations

NOTIFICATION OF RECTIFICATION OR ERASURE

In our commitment to safeguarding your privacy, we want to inform you that ROOK does not make any changes to your personal information if under certain circumstances changes are needed or made to your personal information as a data subject, we are dedicated to providing prompt and transparent notification. Whether it be an update, correction, or any other modification to your data, we believe in keeping you informed about the changes that may impact your privacy. This notice is in line with our commitment to compliance with data protection regulations and reflects our ongoing efforts to uphold the highest standards of transparency and accountability in handling your personal information.

PERSONAL INFORMATION OF MINORS

Rookeries does not carry out any type of data collection or sale to third parties of information on minors, since all provision of services and contracting with Rookeries is for persons of legal age established by the law that governs the user in these terms.

In the event that Rookeries identifies that information has been erroneously obtained from a minor, it is its commitment to eliminate all data that is held in the systems, as well as if you recognize that a minor has made information available to us, please approach us to do so to our knowledge and thus eliminate any data that may jeopardize or compromise the security of the minor's data.

Rookeries declares, not only for California residents in their right to non-discrimination in the exercise of their rights under the CCPA but for all those who have access to this site and the provision of services by this company, that it is a commitment and one of our fundamental values, non-discrimination of any kind for reasons of gender, race, social and/or economic condition, preferences of any kind or regulations that protect them.

Rookeries makes it clear that under future projections and the scope of growth of this company, many more international regulations may be adhered to this privacy policy.

In the advancement of our development, Rookeries works hard to comply with every provision that regulates the privacy of personal data in the provision of our services.

Links on the site. We may have made available links to third-party sites in the display of our information or in any part of our website, however, we are not responsible for their privacy practices, for which we invite you before using their services or site to read their policies.

MODIFICATIONS TO THE PRIVACY POLICY

ROOKERIES reserves the right to modify or update this privacy policy at any time. Changes will be communicated through the ROOK website or other appropriate means. It is recommended to regularly review this privacy policy for the latest information.

CONTACT US

Rookeries puts at your disposal the mail so that you can communicate with respect to any questions, concerns, or requests regarding this privacy policy, data deletion, accuracy, or any other privacy practices
compliances@tryrook.io

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