

# Privacy Policy

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## Introduction and organizational info

We, at Individual, are dedicated to serving our customers and contacts to the best of our abilities. Part of our commitment involves the responsible management of personal information collected through our website `capitalnyc-nx2rln9rx-sueannioanis.vercel.app`, and any related interactions. Our primary goals in processing this information include:

- Enhancing the user experience on our platform by understanding customer needs and preferences.
- Providing timely support and responding to inquiries or service requests.
- Improving our products and services to meet the evolving demands of our users.
- Conducting necessary business operations, such as billing and account management.

It is our policy to process personal information with the utmost respect for privacy and security. We adhere to all relevant regulations and guidelines to ensure that the data we handle is protected against unauthorized access, disclosure, alteration, and destruction. Our practices are designed to safeguard the confidentiality and integrity of your personal information, while enabling us to deliver the services you trust us with.

- We do not have a designated Data Protection Officer (DPO) but remain fully committed to addressing your privacy concerns. Should you have any questions or require further information about how we manage personal information, please feel free to contact us at `s70550687@gmail.com` or `+1-US 7322259377`.

Your privacy is our priority. We are committed to processing your personal information transparently and with your safety in mind. This commitment extends to our collaboration with third-party services that may process personal information on our behalf, such as in the case of sending invoices. Rest assured, all activities are conducted in strict compliance with applicable privacy laws.

## Scope and application

Our privacy policy is designed to protect the personal information of all our stakeholders, including website visitors, registered users, and customers. Whether you are just browsing our website `capitalnyc-nx2rln9rx-sueannioanis.vercel.app`, using our services as a registered user, or engaging with us as a valued customer, we ensure that your personal data is processed with the highest standards of privacy and security. This policy outlines

our practices and your rights related to personal information.

## Data collection and processing

Our commitment to transparency and data protection extends to how we collect and use your personal information. We gather personal data through various interactions, including but not limited to, when you utilize our services or products such as Individual, or directly provide information to us.

The following list details the types of personal information we may process:

- **First and last name**
- **Email address and/or Phone number**
- **Date of birth**
- **National identification numbers (e.g., social security number, passport ID)**
- **Address and city**
- **Payment information (e.g., credit card number, bank details)**
- **Biometrics (e.g., fingerprints, face scans, voice recognition)**
- **Device ID**
- **IP address**
- **Browser information and language**
- **Operating system and version**
- **Browser fingerprint**
- **Real-time location (e.g., GPS)**
- **IP-based approximate location**
- **Browsing history**
- **Interaction logs (e.g., clicks, time spent on pages)**
- **Health data**
- **Purchase history**
- **Payment method and history**

Please note, that we only process information that is essential for delivering our services, complying with legal obligations, or enhancing your user experience. Your privacy is paramount, and we are dedicated to handling your personal information responsibly and in accordance with all applicable laws.

At Individual, we believe in using personal information responsibly and ethically. The data we collect serves multiple purposes, all aimed at enhancing the services we offer and ensuring the highest level of satisfaction among our users, customers, and employees. Here are the key ways in which we use the personal information collected:

- **Authentication and security**

- **Customizing and adapting user experience**
- **Content delivery**
- **Communication efforts**
- **Analytics and performance tracking**
- **Marketing and advertising**
- **Displaying videos**
- **Processing transactions**
- **Providing access to exclusive content**
- **Tag management**
- **User feedback and satisfaction**
- **Improving public health**
- **User engagement and retention**
- **Payment processing**
- **Fraud prevention and risk management**
- **Customer support**
- **Research and development**
- **Compliance with legal obligations**

Your privacy is our priority. We process your personal information transparently and in accordance with your preferences and applicable privacy laws. We are committed to ensuring that your data is used solely for the purposes for which it was collected and in ways that you have authorized.

## **Data storage and protection**

### **Data storage**

- Personal information is stored in secure servers located in the following locations: US. For services that require international data transfer, we ensure that such transfers comply with all applicable laws and maintain data protection standards equivalent to those in our primary location.
- Data hosting partners: We partner with reputable data hosting providers committed to using state-of-the-art security measures. These partners are selected based on their adherence to stringent data protection standards.

### **Data protection measures**

- **Encryption:** To protect data during transfer and at rest, we employ robust encryption technologies.
- **Access control:** Access to personal information is strictly limited to authorized personnel who have a legitimate business need to access the data. We enforce strict access controls and regularly review

permissions.

- **Security audits and monitoring:** Regular security audits are conducted to identify and remediate potential vulnerabilities. We also monitor our systems for unusual activities to prevent unauthorized access.

## Data sharing and disclosure

At Individual, we are committed to safeguarding your personal information and ensuring it is treated with the utmost respect. This commitment extends to how we handle the sharing and disclosure of your data. Below we outline our practices in this area:

### Sharing personal information

- **Third-party service providers:** We may share your information with third-party service providers who perform services on our behalf. Such trusted parties may have access to personally identifiable information on a need-to-know basis and will be contractually obliged to keep your information confidential. These partners are prohibited from using your personal information for any purpose other than to provide these services to Individual, and they are required to maintain the confidentiality of your information.

## Data processing agreements

When we share your data with third-party service providers, we do so under the protection of Data Processing Agreements (DPAs) that ensure your information is managed in accordance with GDPR and other relevant data protection laws. These agreements mandate that third parties implement adequate technical and organizational measures to ensure the security of your data.

### Transparency and control

We believe in transparency and providing you with control over your personal information. You will always be informed about any significant changes to our sharing practices, and where applicable, you will have the option to consent to such changes.

Your trust is important to us, and we strive to ensure that your personal information is disclosed only in accordance with this policy and when there is a justified reason to do so. For any queries or concerns about how we share and disclose personal information, please reach out to us at [s70550687@gmail.com](mailto:s70550687@gmail.com) or +1-US 7322259377.

## User rights and choices

At Individual, we recognize and respect your rights regarding your personal information, in accordance with the

General Data Protection Regulation (GDPR) and other applicable data protection laws. We are committed to ensuring you can exercise your rights effectively. Below is an overview of your rights and how you can exercise them:

#### Your rights

- **Right of access** ([Art. 15 GDPR](#)): You have the right to request access to the personal information we hold about you and to obtain information about how we process it.
- **Right to rectification** ([Art. 16 GDPR](#)): If you believe that any personal information we hold about you is incorrect or incomplete, you have the right to request its correction or completion.
- **Right to erasure ('right to be forgotten')** ([Art. 17 GDPR](#)): You have the right to request the deletion of your personal information when it is no longer necessary for the purposes for which it was collected, among other circumstances.
- **Right to restriction of processing** ([Art. 18 GDPR](#)): You have the right to request that we restrict the processing of your personal information under certain conditions.
- **Right to data portability** ([Art. 20 GDPR](#)): You have the right to receive your personal information in a structured, commonly used, and machine-readable format and to transmit those data to another controller.
- **Right to object** ([Art. 21 GDPR](#)): You have the right to object to the processing of your personal information, under certain conditions, including processing for direct marketing.
- **Right to withdraw consent** ([Art. 7\(3\) GDPR](#)): Where the processing of your personal information is based on your consent, you have the right to withdraw that consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.
- **Right to lodge a complaint** ([Art. 77 GDPR](#)): You have the right to lodge a complaint with a supervisory authority if you believe our processing of your personal information violates applicable data protection laws.

#### Exercising your rights

To exercise any of these rights, please contact us at [s70550687@gmail.com](mailto:s70550687@gmail.com) or +1-US 7322259377. We will respond to your request in accordance with applicable data protection laws and within the timeframes stipulated by those laws. Please note, in some cases, we may need to verify your identity as part of the process to ensure the security of your personal information.

We are committed to facilitating the exercise of your rights and to ensuring you have full control over your personal information. If you have any questions or concerns about how your personal information is handled, please do not hesitate to get in touch with us.

#### Cookies and tracking technologies

At Individual, we value your privacy and are committed to being transparent about our use of cookies and other tracking technologies on our website [capitalnyc-nx2rln9rx-sueannioanis.vercel.app](https://capitalnyc-nx2rln9rx-sueannioanis.vercel.app). These technologies play a

crucial role in ensuring the smooth operation of our digital platforms, enhancing your user experience, and providing insights that help us improve.

## **Understanding cookies and tracking technologies**

Cookies are small data files placed on your device that enable us to remember your preferences and collect information about your website usage. Tracking technologies, such as web beacons and pixel tags, help us understand how you interact with our site and which pages you visit.

### **How we use these technologies**

- **Essential cookies:** Necessary for the website's functionality, such as authentication and security. They do not require consent.
- **Performance and analytics cookies:** These collect information about how visitors use our website, which pages are visited most frequently, and if error messages are received from web pages. These cookies help us improve our website.
- **Functional cookies:** Enable the website to provide enhanced functionality and personalization, like remembering your preferences.
- **Advertising and targeting cookies:** Used to deliver advertisements more relevant to you and your interests. They are also used to limit the number of times you see an advertisement and help measure the effectiveness of the advertising campaign.

### **Your choices and consent**

Upon your first visit, our website will present you with a cookie consent banner, where you can:

- **Accept all cookies:** Consent to the use of all cookies and tracking technologies.
- **Reject non-essential cookies:** Only essential cookies will be used to provide you with necessary website functions.
- **Customize your preferences:** Choose which categories of cookies you wish to allow.

### **Changes to our cookie use**

We may update our use of cookies and tracking technologies to improve our services or comply with legal requirements. We will notify you of any significant changes and seek your consent where necessary.

For more detailed information about the cookies we use, their purposes, and how you can manage your preferences, please visit our detailed Cookie Policy <https://capital.nyc>.

Should you have any questions or concerns about our use of cookies and tracking technologies, please do not hesitate to contact us at [s70550687@gmail.com](mailto:s70550687@gmail.com) or +1-US 7322259377. Your privacy and the integrity of your personal data are of utmost importance to us.

## **International data transfers**

At Individual, we may transfer your personal information to locations outside of your country of residence, including to countries that may have different data protection laws than those in your jurisdiction. We want to assure you that any such transfers are conducted with the utmost care and in compliance with applicable data protection regulations, including the General Data Protection Regulation (GDPR).

## **Children's privacy**

At Individual, we are committed to protecting the privacy of children who use our services. We recognize the importance of safeguarding the personal information of minors, and we take steps to ensure compliance with applicable laws and regulations, including the Children's Online Privacy Protection Act (COPPA) in the United States and similar regulations in other jurisdictions.

## **Age requirements**

Our services are not intended for children under the age of 35. We do not knowingly collect personal information from children under this age without verifiable parental consent. If you are under the age of 35, please do not use our services or provide any personal information to us.

## **Collection and use of children's information**

If we become aware that we have inadvertently collected personal information from a child under the age of 35 without verifiable parental consent, we will take prompt steps to delete such information from our records. If you believe that we may have collected personal information from a child under the age of 35 without parental consent, please contact us immediately at [s70550687@gmail.com](mailto:s70550687@gmail.com) or +1-US 7322259377.

## **Verifiable parental consent**

For certain features or services that may be directed towards children, we may obtain verifiable parental consent before collecting, using, or disclosing personal information from a child. Verifiable parental consent may be obtained through methods such as:

- Providing a consent form to be signed and returned by the child's parent or guardian.
- Verifying a parent's identity through a credit card transaction or other means.

## **Parental rights**

Parents or legal guardians of children under the age of 35 have the right to review, update, or delete any personal information collected from their child. To exercise these rights or to request the deletion of a child's information, please contact us at [s70550687@gmail.com](mailto:s70550687@gmail.com) or +1-US 7322259377.

## **Compliance with United States privacy laws**

To appeal a decision we may make regarding your request, please contact us within 60 days of receiving our response by submitting your request through the link on our website or by using one of the following methods:

Email: s70550687@gmail.com

Phone: 7322259377 In your appeal request, please include your original request, the date of our response, and a brief explanation of why you believe our decision was incorrect.

For residents of the United States of America the following provisions apply:

## **A. Individual rights**

The California Consumer Privacy Act provides residents of California specific rights regarding their personal information, additional to what has been described before.

## **B. Right to Know**

You may request that we disclose to you what personal information we have collected, used, shared, or sold about you, and why we collected, used, shared, or sold that information. Specifically, you may request the disclosure of:

- The categories of personal information collected
- Specific pieces of personal information collected
- The categories of sources from which we collected personal information
- The purposes for which personal information is used
- The categories of third parties with whom personal information is shared
- The categories of information that are sold or disclosed to third parties

## **C. Right to Delete**

You may request that we delete personal information we have collected about you.

## **D. Right to Correct**

You may ask us to correct inaccurate information that we have about you.

## **E. Right to Limit**

You can request us to only use your sensitive personal information (for example, your social security number, your genetic data, etc.) for limited purposes, such as providing you with the services you requested.

## **F. Right to Opt-Out**

Individual does not sell or share personal information. In case your data is sold or shared you can make use of your right to opt-out of the sale or sharing of personal information by submitting your request through the link on our website.

## **G. Right to Non-Discrimination**

You have the right to be protected from discrimination for exercising your rights.

## **H. Submitting requests**

You may submit your request by sending an email to [s70550687@gmail.com](mailto:s70550687@gmail.com) or by phone at +1-US 7322259377. We will compare the information you submit to us with the information we have in our records to verify your request. We will then respond to your request in accordance with the requirements.

## **I. Children under the age of 35**

Individual recognizes the importance of protecting the privacy of minors. We do not knowingly collect or disclose the personal information of children under the age of 35. If a child under the age of 35 has provided us with personal information, we ask that a parent or guardian contacts us by email to [s70550687@gmail.com](mailto:s70550687@gmail.com) or by phone at +1-US 7322259377

## **J. Sensitive data and/or biometric data**

We only process sensitive personal data with your prior consent and only for specific purposes that are clearly disclosed at the time of collection. You may withdraw your consent at any time by submitting your request through the link on our website or by email to [s70550687@gmail.com](mailto:s70550687@gmail.com).

## **Direct marketing and communications**

At Individual, we may use your personal information to send you direct marketing communications about our products, services, promotions, and other relevant information that we believe may be of interest to you. We are committed to ensuring that our direct marketing practices are transparent, lawful, and in compliance with applicable data protection laws, including the General Data Protection Regulation (GDPR) and the ePrivacy Directive.

### **Obtaining consent for direct marketing**

- **Opt-in consent:** We will obtain your explicit opt-in consent before sending you direct marketing communications, where required by law. This means that you will have the opportunity to actively consent to receiving marketing messages from us before we send them to you.
- **Unsubscribe option:** Every direct marketing communication we send will include clear instructions on how to unsubscribe or opt-out from receiving future marketing communications. You can exercise your right to opt-out at any time, and we will promptly honor your request to stop sending you marketing messages.

### **Types of direct marketing communications**

We may use your personal information to send you direct marketing communications via various channels, including:

- **Email**
- **Telemarketing**
- **SMS**

- **Postal mail**
- **Social media platforms**
- **Telephone calls**
- **Push notifications**
- **In-app messaging**
- **Chatbots**
- **Retargeting ads**
- **Referral programs**
- **Direct video marketing**
- **Geotargeted marketing**

### **Managing your preferences**

You have control over the direct marketing communications you receive from us. You can manage your communication preferences by using the unsubscribe link provided in our marketing emails or text messages.

## **Data breach notification procedures**

At Individual, we understand the importance of protecting your personal information and take proactive measures to safeguard it. In the event of a data breach that poses a risk to your privacy rights and freedoms, we have established clear procedures for promptly identifying, assessing, and mitigating the impact of the breach. Our data breach notification procedures are designed to comply with applicable data protection laws and regulations, including the General Data Protection Regulation (GDPR).

### **Detection and assessment**

- **Internal monitoring:** We employ robust security measures and monitoring systems to detect and respond to potential data breaches promptly.
- **Assessment of breach impact:** Upon discovery of a data breach, we will conduct a thorough assessment to determine the nature and scope of the breach, including the types of personal information involved and the potential impact on affected individuals.

### **Notification obligations**

- **Regulatory authorities:** If required by law, we will notify the relevant data protection authorities of the data breach within 30 day(s), following the procedures specified by applicable regulations.
- **Affected individuals:** If a data breach poses a significant risk to your privacy rights and freedoms, we will notify you within 30 day(s), providing clear and concise information about the breach, the types of personal information affected, and the steps you can take to protect yourself.

### **Communication channels**

- **Email notification:** We may notify affected individuals via email, using the contact information provided to us, if feasible and appropriate.
- **Website notification:** We may also post a notification on our website or through other communication channels accessible to affected individuals.

## Support and assistance

In the event of a data breach, we are committed to providing affected individuals with the support and assistance they need, including guidance on steps they can take to mitigate the potential risks associated with the breach.

Point of contact: If you have any questions or concerns about a data breach or believe you may have been affected, please contact us immediately at [s70550687@gmail.com](mailto:s70550687@gmail.com) or +1-US 7322259377.

## Policy updates and changes

At Individual, we are committed to keeping you informed about how we handle your personal information and any changes to our privacy practices. We may update this privacy policy from time to time to reflect changes in legal requirements, industry standards, or our business operations. We want to assure you that any updates will be communicated transparently and in accordance with applicable data protection laws.

### Notification of changes

- **Notification process:** In the event of significant changes to our privacy policy that may affect your rights or the way we handle your personal information, we will provide notice through prominent means, such as email, website notifications, or other appropriate channels. We will also indicate the effective date of the updated policy at the top of the document.
- **Reviewing changes:** We encourage you to review our privacy policy periodically to stay informed about how we collect, use, and protect your personal information. Your continued use of our services after any changes to the policy signifies your acceptance of the updated terms.

### Opt-in consent for material changes

For material changes to our privacy policy that require your consent under applicable data protection laws, such as the General Data Protection Regulation (GDPR), we will seek your explicit opt-in consent before implementing the changes. You will have the opportunity to review the updated policy and provide your consent before any changes take effect.

### Contact us

If you have any questions or concerns about our privacy policy or any updates to it, please don't hesitate to contact us at [s70550687@gmail.com](mailto:s70550687@gmail.com) or +1-US 7322259377. We are here to address any inquiries you may have and to ensure that you have the information you need to feel confident about how your personal information is handled.

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