

Privacy Policy for Naaraa
Version 5

Protecting the individual's privacy on the Internet is crucial to the future of Internet-based business and the move toward a true Internet economy. We have created this Privacy Statement to demonstrate our firm commitment to the individual's right to data protection and privacy. This Privacy Statement outlines how we handle information that can be used to directly or indirectly identify an individual ("Personal Data").

A. GENERAL INFORMATION

When does this Privacy Statement apply? This Privacy Statement applies to Personal Data that you provide to NAARAA or which is derived from the Personal Data as outlined below. The use of and any information that is gathered by cookies or other web tracking technologies is subject to the disclosures and options provided by the Consent Manager which can be found on the relevant website.

Data Controller. The data controller of www.naaraa.com is NAARAA LLC., 7112 JOSHUA WAY FAIRBURN, GEORGIA 30213, USA ("NAARAA"). Where a registration form is presented on this website, the data controller may vary depending on the actual offering or the purpose of the data collection but it is in any case displayed on the individual registration form's privacy statement. The NAARAA Group's data protection officer is Fabfabio Williams (contact@naaraa.com).

What does NAARAA do with my Personal Data? NAARAA will process the Personal Data provided hereunder only as set out in this Privacy Statement. Further information can be found in Sections B. and C. below. Where the processing of your Personal Data is based on a statutory permission, you can find information on which Personal Data NAARAA is processing or using for which purposes in Section B below. Where consent for the processing of your Personal Data is required you can find further information in Section C. below. This information matches with the respective consent statements pertaining to individual processing operations in the Consent Resource Center (<https://www.naaraa.com/>).

Duration of processing of Personal Data. Where NAARAA is processing and using your Personal Data as permitted by law (see B. below) or under your consent (see C. below), NAARAA will store your Personal Data (i) only for as long as is required to fulfill the purposes set out below or (ii) until you object to NAARAA's use of your Personal Data (where NAARAA has a legitimate interest in using your Personal Data), or (iii) until you withdraw your consent (where you consented to NAARAA using your Personal Data). However, where NAARAA is required by mandatory law to retain your Personal Data longer or where your Personal Data is required for NAARAA to assert or defend against legal claims, NAARAA will retain your Personal Data until the end of the relevant retention period or until the claims in question have been settled.

Why am I required to provide Personal Data? As a general principle, your granting of any consent and your provision of any Personal Data hereunder is entirely voluntary; there are generally no detrimental effects on you if you choose not to consent or to provide Personal Data. However, there are circumstances in which NAARAA cannot take action without certain Personal Data, for example because this Personal Data is required to process your orders or provide you with access to a web offering or newsletter. In these cases, it will unfortunately not be possible for NAARAA to provide you with what you request without the relevant Personal Data.

Where will my Personal Data be processed? As part of a global group of companies, NAARAA has affiliates and third-party service providers within as well as outside of the European Economic Area (the "EEA"). As a consequence, whenever NAARAA is using or otherwise processing your Personal Data for the purposes set out in this Privacy Statement, NAARAA may transfer your Personal Data to countries outside of the EEA including to such countries in which a statutory level of data protection applies that is not comparable to the level of data protection within the EEA. Whenever such transfer occurs, it is based on the Standard Contractual Clauses (according to EU Commission Decision 87/2010/EC or any future replacement) in order to contractually provide that your Personal Data is subject to a level of data protection that applies within the EEA. You may obtain a redacted copy (from which commercial information and information that is not relevant has been removed) of such Standard Contractual Clauses by sending a request to privacy@naaraa.com.

Data subjects' rights. You can request from NAARAA at any time information about which Personal Data NAARAA processes about you and the correction or deletion of such Personal Data. Please note, however, that NAARAA can delete your Personal Data only if there is no statutory obligation or prevailing right of NAARAA to retain it. Kindly note that if you request that NAARAA delete your Personal Data, you will not be able to continue to use any NAARAA service that requires NAARAA's use of your Personal Data.

If NAARAA uses your Personal Data based on your consent or to perform a contract with you, you may further request from NAARAA a copy of the Personal Data that you have provided to NAARAA. In this case, please contact the email address below and specify the information or processing activities to which your request relates, the format in which you would like this information, and whether the Personal Data is to be sent to you or another recipient. NAARAA will carefully consider your request and discuss with you how it can best fulfill it.

Furthermore, you can request from NAARAA that NAARAA restricts your Personal Data from any further processing in any of the following events: (i) you state that the Personal Data NAARAA has about you is incorrect, (but only for as long as NAARAA requires to check the accuracy of the relevant Personal Data), (ii) there is no legal basis for NAARAA processing your Personal Data and you demand that NAARAA restricts your Personal Data from further processing, (iii) NAARAA no longer requires your Personal Data but you claim that you require NAARAA to retain such data in order to claim or exercise legal rights or to defend against third party claims or (iv) in case you object to the processing of your Personal Data by NAARAA (based on NAARAA's legitimate interest as further set out in B. below) for as long as it is required to review as to whether NAARAA has a prevailing interest or legal obligation in processing your Personal Data.

Please direct any such request to support@naaraa.com.

Right to lodge a complaint. If you believe that NAARAA is not processing your Personal Data in accordance with the requirements set out herein or applicable EEA data protection laws, you can at any time lodge a complaint with the data protection authority of the EEA country in which you live or with the data protection authority of the country or state in which NAARAA has its registered seat.

Use of this website by children. This website is not intended for anyone under the age of 14 years. If you are younger than 16, you may not register with or use this website.

Links to other websites. This website may contain links to foreign (meaning non-NAARAA Group companies) websites. NAARAA is not responsible for the privacy practices or the content of websites outside the NAARAA Group of companies. Therefore, we recommend that you carefully read the privacy statements of such foreign sites.

B. WHERE NAARAA USES MY PERSONAL DATA BASED ON THE LAW

In the following cases, NAARAA is permitted to process your Personal Data under the applicable data protection law.

Providing the requested goods or services. If you order goods or services from NAARAA, NAARAA will use the Personal Data that you enter into the order or registration form (usually a subset of) your name, (email) address, telephone number, company name and address, your job title and role and, if payment is to be made to NAARAA, credit card number or bank details) only to process your order or to provide the requested goods or service. This may include taking the necessary steps prior to entering into the contract, responding to your related inquiries, and providing you with shipping and billing information and to process or provide customer feedback and support. This may also include conversation data that you may trigger via the chat functionalities on Naaraa.com or other local NAARAA web presences, contact forms, emails, or telephone. In this Privacy Statement, "goods and services" includes (access to) NAARAA's web services, offerings, contests, sweepstakes, other content, non-marketing related newsletters, whitepapers, tutorials, trainings and events.

If you participate in tutorials or trainings provided by NAARAA, NAARAA may also track your learning progress in order to make this information available to you. Furthermore, we communicate on a regular basis by email with users who subscribe to our services, and we may also communicate by phone to resolve customer complaints or investigate suspicious transactions. We may use your email address to confirm your opening of an account, to send you notice of payments, to send you information about changes to our products and services, and to send notices and other disclosures as required by law. Generally, users cannot opt out of these communications, which are not marketing-related but merely required for the relevant business relationship. With regard to marketing-related types of communication (i.e. emails and phone calls), NAARAA will (i) where legally required only provide you with such information after you have opted in and (ii) provide you the opportunity to opt out if you do not want to receive further marketing-related types of communication from us. You can opt out of these at any time at <https://www.naaraa.com/unsubscribe>.

Ensuring compliance. NAARAA and its products, technologies, and services are subject to the export laws of various countries including, without limitation, those of the European Union and its member states, and of the United States of America. You acknowledge that, pursuant to the applicable export laws, trade sanctions, and embargoes issued by these countries, NAARAA is required to take measures to prevent entities, organizations, and parties listed on government-issued sanctioned-party lists from accessing certain products, technologies, and services through NAARAA's websites or other delivery channels controlled by NAARAA. This may include (i) automated checks of any user registration data as set out herein and other information a user provides about his or her identity against applicable sanctioned-party lists; (ii) regular repetition of such checks whenever a sanctioned-party list is updated or when a user updates his or her information; (iii) blocking of access to NAARAA's services and systems in case of a potential match; and (iv) contacting a user to confirm his or her identity in case of a potential match.

Furthermore, you acknowledge that any information required to track your choices regarding the processing or use of your Personal Data or receipt of marketing materials (that is to say, depending on the country in which the relevant NAARAA Group company operates, whether you have expressly consented to or opted out of receiving marketing materials) may be stored and exchanged between members of the NAARAA Group as required to ensure compliance.

NAARAA's legitimate interest. Each of the use cases below constitutes a legitimate interest of NAARAA to process or use your Personal Data. If you do not agree with this approach, you may object against NAARAA's processing or use of your Personal Data as set out below.

Questionnaires and surveys. NAARAA may invite you to participate in questionnaires and surveys. These questionnaires and surveys will be generally designed in a way that they can be answered without any Personal Data. If you nonetheless enter Personal Data in a questionnaire or survey, NAARAA may use such Personal Data to improve its products and services.

Creation of anonymized data sets. NAARAA may anonymize Personal Data provided under this Privacy Statement to create anonymized data sets, which will then be used to improve its and its affiliates' products and services.

Recording of calls and chats for quality improvement purposes. In case of telephone calls or chat sessions, NAARAA may record such calls (after informing you accordingly during that call and before the recording starts) or chat sessions in order to improve the quality of NAARAA's services.

In order to keep you up-to-date/request feedback. Within an existing business relationship between you and NAARAA, NAARAA may inform you, where permitted in accordance with local laws, about its products or services (including webinars, seminars or events) which are similar or relate to such products and services you have already purchased or used from NAARAA. Furthermore, where you have attended a webinar, seminar or event of NAARAA or purchased products or services from NAARAA, NAARAA may contact you for feedback regarding the improvement of the relevant webinar, seminar, event, product or service.

Right to object. You may object to NAARAA using Personal Data for the above purposes at any time by unsubscribing at <https://www.naaraa.com/unsubscribe>. If you do so, NAARAA will cease using your Personal Data for the above purposes (that is to say, under a legitimate interest set out above) and remove it from its systems unless NAARAA is permitted to use such Personal Data for another purpose set out in this Privacy Statement or NAARAA determines and demonstrates a compelling legitimate interest to continue processing your Personal Data.

C. WHERE NAARAA USES MY PERSONAL DATA BASED ON MY CONSENT

In the following cases NAARAA will only use your Personal Data as further detailed below after you have granted your prior consent into the relevant processing operations. Therefore, each information about a processing operation with regard to Personal Data is linked to one consent statement in the Consent Resource Center (<https://www.naaraa.com/consent-resource-center>). If you re-open this Privacy Statement after you have initially one or more consents granted you will not only see the information related to the consents you have granted but the full privacy statement.

News about NAARAA's Products and Services. Subject to a respective provision and your consent, NAARAA may use your name, email and postal address, telephone number, job title and basic information about your employer (name, address, and industry) as well as an interaction profile based on prior interactions with NAARAA (prior purchases, participation in webinars, seminars, or events or the use of (web) services - further details on this topic can be found in the TrustArc Consent Manager displayed on the relevant NAARAA website) in order to keep you up to date on the latest product announcements, software updates, software upgrades, special offers, and other information about NAARAA's software and services (including marketing-related newsletters) as well as events of NAARAA and in order to display relevant content on NAARAA's websites. In connection with these marketing-related activities, NAARAA may provide a hashed user ID to third party operated social networks or other web offerings (such as Twitter, LinkedIn, Facebook, Instagram or Google) where this information is then matched against the social networks' data or the web offerings' own data bases in order to display to you more relevant information.

Creating user profiles. NAARAA offers you the option to use its web offerings including forums, blogs, and networks (such as the NAARAA Community) linked to this website that require you to register and create a user profile. User profiles provide the option to display personal information about you to other users, including but not limited to your name, photo, social media accounts, postal or email address, or both, telephone number, personal interests, skills, and basic information about your company. These profiles may relate to a single web offering of NAARAA or, if created in the NAARAA Cloud Platform Identity Authentication Service, may also allow you to access other web offerings of NAARAA or of other entities of the NAARAA Group, or both (irrespective of any consent granted under the section "Forwarding your Personal Data to other NAARAA companies." below). It is, however, always your choice which of these additional web offerings you use and your Personal Data is only forwarded to them once you initially access them. Kindly note that without your consent for NAARAA to create such user profiles NAARAA will not be in a position to offer such services to you where your consent is a statutory requirement that NAARAA can provide these services to you.

Within any web offering, beyond the mere provision of access your profile is used to personalize interaction with other users (for example, by way of messaging or follow functionality) and by NAARAA to foster the quality of communication and collaboration through such offerings and for NAARAA to provide gamification elements (gamification is the process of taking something that already exists, such as a website, an enterprise application, or an online community, and integrating game mechanics into it to motivate participation, engagement, and loyalty). To the greatest extent supported by the relevant web offering, you can use the functionality of the relevant web offering to determine which information you want to share.

Special categories of Personal Data. In connection with the registration for and provision of access to an event or seminar, NAARAA may ask for information about your health for the purpose of identifying and being considerate of individuals who have disabilities or special dietary requirements throughout the event. Any such use of information is based on the consent you grant hereunder.

Kindly note that if you do not provide any such information about disabilities or special dietary requirements, NAARAA will not be able to take any respective precautions.

Event profiling. If you register for an event, seminar, or webinar of NAARAA, NAARAA may share basic participant information (your name, company, and email address) with other participants of the same event, seminar, or webinar for the purpose of communication and the exchange of ideas.

Forwarding your Personal Data to other NAARAA companies. NAARAA may transfer your Personal Data to other entities in the NAARAA Group. The current list of NAARAA Group entities can be found at <https://www.naaraa.com/legal-entities>. In such cases, these entities will then use the Personal Data for the same purposes and under the same conditions as outlined in this Section C. above.

Revocation of a consent granted hereunder. You may at any time withdraw a consent granted hereunder by unsubscribing at <https://www.naaraa.com/unsubscribe>. In case of withdrawal, NAARAA will not process Personal Data subject to this consent any longer unless legally required to do so. In case NAARAA is required to retain your Personal Data for legal reasons your Personal Data will be restricted from further processing and only retained for the term required by law. However, any withdrawal has no effect on past processing of personal data by NAARAA up to the point in time of your withdrawal. Furthermore, if your use of an NAARAA offering requires your prior consent, NAARAA will not be (any longer) able to provide the relevant service (or services, if you revoke the consent for NAARAA to use your profile under the NAARAA Cloud Platform Identity Authentication Service for multiple NAARAA offerings), offer or event to you after your revocation.

D. U.S.-SPECIFIC PROVISIONS

Where NAARAA is subject to U.S. privacy requirements, the following also applies:

Do Not Track. Your browser may allow you to set a "Do not track" preference. Unless otherwise stated, our sites do not honor "Do not track" requests. However, you may elect not to accept cookies by changing the designated settings on your web browser or, where available, by way of the TrustArc Consent Manager if the relevant website contains a link to it. Cookies are small text files placed on your computer while visiting certain sites on the Internet used to identify your computer. Please note that if you do not accept cookies, you may not be able to use certain functions and features of our site. This site does not allow third parties to gather information about you over time and across sites.

Requirements to Protect Children's Privacy. We do not intend for our websites or online services to be used by anyone under the age of 13. If you are a parent or guardian and believe we may have collected information about a child, please contact at contact@naaraa.com