KeenTools Privacy Policy

Last updated: October 5, 2022

This Privacy Policy describes Our policies and procedures on the collection, use and disclosure of Your information when You use the Product 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.

This Privacy Policy may be amended from time to time. The respective latest version of the Privacy Policy at the point of time of the purchase or registration of a KeenTools Software Product (whichever occurs later) shall apply. The data controller is KeenTools LLC, Davtashen 10th street, building 22/3, 0054, Yerevan, Republic of Armenia.

Interpretation and Definitions

The following definitions are used throughout this Privacy Policy:

- You referred to as 'Customer' in this Privacy Policy, 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
- **KeenTools** referred to as either *'the Company'*, *'We'*, *'Us'* or *'Our'* in this Privacy Policy, means KeenTools LLC, Davtashen 10th street, building 22/3, 0054, Yerevan, Republic of Armenia
- KeenTools Product referred to as either 'Software' or 'Service': Any software product owned or created by KeenTools and provided under KeenTools' End-User Licence Agreement or other KeenTools' Agreement
- KeenTools Website any website that is the property of KeenTools Ltd, including keentools.io

Personal Data - any information that relates to an identified or identifiable individual

Data We Collect

Categories of data involved in data processing include: names, email address, username, cookies, IP address, physical address and ZIP, company information, payment information, hardware ID, usage data of KeenTools products, comments, voluntarily provided feedback, any data provided in survey responses, data in issue reports pertaining to KeenTools Products.

Where appropriate, we will prompt you to give us your consent to the collection and processing of your data as described above. This may happen within KeenTools Products, on KeenTools Website, or in another environment set up by KeenTools, always in a clear and conspicuous manner.

We collect the information about You for the following purposes:

- To provide you with software, services, or information
- To deliver products that you request
- To improve our services, Websites and how we operate our business based on usage
- To understand and enhance your experience using our Website, products, and services
- To send you related information, including confirmations, technical notices, updates, security alerts, support, and administrative messages
- To protect us from piracy and unlawful use of our software or services
- For internal evidence of KeenTools and to protect the rights and interests of KeenTools and other users
- To promote and market our Products and Services

Where We Store Your Personal Information

Your personal information and files are stored on KeenTools' servers and the servers of companies we hire to provide services to us. For more information about third-party companies, please see the relevant section below.

Data Security

KeenTools takes the protection of customer data extremely seriously. Technical measures are in place to prevent unauthorised or unlawful access to data and against accidental loss or destruction of, or damage to, data.

We use partners to host our services and websites and to process your data in accordance with this Privacy Policy. While choosing the partners, we ascertain their compliance with legal regulations and security standards to make sure your data is stored in a secure location with appropriate security measures in place.

Sharing

Collected personal data is shared based on End-User License Agreement and this Privacy Policy.

We may share your data with certain third parties which help us provide you with KeenTools Products, or to run our business, for example to providers of data storage and backup services. We may also share your data with individual representatives of your company. Your personal data may also be shared with other organizations or individuals if we have obtained your consent to do so.

We may also share your data with certain third parties if we are obliged to do so under applicable legislation (especially with tax authorities or with other government bodies exercising their statutory powers) or if such sharing is necessary to achieve the purposes defined above (especially with government bodies or with parties harmed as a result of violations of applicable laws).

To adhere to the requirements of the California Consumer Privacy Act (CCPA), we hereby notify you that KeenTools will not:

- Retain, use, sell, or otherwise disclose any Personal Data for any purpose other than to provide the Products specified in the End-User License Agreement
- Retain, use, sell, or disclose such Personal Data outside of the direct relationship between Customer and KeenTools
- Use Personal Data other than as described within the KeenTools Privacy
 <u>Policy</u>, or within the KeenTools End-User License Agreement or any other
 specific agreement you may have entered into with KeenTools.

Tracking Technologies and Cookies

We, and our third-party service providers, use cookies and other tracking technologies on our Website. We use Cookies to identify you when you visit our Website, to deliver our products and services to you, to provide you with a service when you browse our Website and to improve our Website and the services that we provide. With your consent, we may also use Cookies, for analytics purposes and for targeted advertising.

What Cookies Are

A cookie is a small file stored temporarily or placed on your computer's hard drive. The main purpose of a cookie is to allow a web server to identify a user's computer and web browser and tailor web pages and/or login information to a user's preferences. Cookies help us promptly display the information needed to use the capabilities on the Service and other information which we consider to be of interest to visitors to the Sites and users of the Service. By gathering and remembering information about website preferences through cookies, we can provide a better web and marketing experience. Cookies do not give us access to your computer.

First / Third-Party Cookies

Cookies set by Us are called 'first-party cookies', while cookies set by others are called 'third-party cookies'. A third-party cookie can recognize your device when

it visits our Website. KeenTools does not control how third-party cookies are used, so you should check the website of a third-party cookie provider for more information about how they are used.

Both first-party and third-party cookies can serve many functions, including analytics, marketing, and advertising.

Currently, our systems do not recognize browser 'do-not-track' requests. You may, however, disable certain tracking by disabling cookies in your browser. However, by doing so we cannot guarantee the correct behaviour of the services we provide to you.

Why We Uses Cookies and Similar Tracking Technologies

KeenTools uses cookies and similar tracking technologies to enable functionality on its Services, and to assist with marketing of products and services to interested individuals.

Cookies help us improve by telling us our Services are being used, letting you navigate between pages efficiently, remembering your preferences, and overall ensuring you enjoy your browsing experience on our Services.

The Cookies used on KeenTools Website, regardless of whether they are used for Service Purposes or Commercial Purposes, are categorized as follows:

Strictly Necessary

These Cookies let you move around the Website and use essential features like secure areas. Without these Cookies, we cannot provide the requested services. We use these Strictly Necessary Cookies to:

- Make sure you connect to the right service on our Website when we make any changes to the way the Website works
- For security purposes

Performance

These Cookies collect information about how you use our Website e.g. which pages you visit, and if you experience any errors. These Cookies do not collect any information that could identify you and are only used to help us improve how our Website works, understand what interests our users and measure the effectiveness of our advertising. Some of our performance Cookies are managed for us by third parties. We do not allow the third party to use the Cookies for any purpose other than those listed below. We use performance Cookies to:

- Carry out web analytics: Provide statistics on how our Website is used
- Obtain data on the number of users of the Website that have viewed a product
- Help us improve the Website by measuring any errors that occur
- Test different designs for the Website

Functionality

These Cookies are used to provide products or services or to remember settings to improve your visit. Some of these Cookies are managed for us by third parties. We do not allow the third party to use the cookies for any purpose other than those listed below. We use 'Functionality' Cookies for such purposes as:

- Remember settings you've applied such as layout, text size, language, preferences and colors
- Remember if we've already asked you if you want to fill in a survey
- Remember if you have engaged with a particular component or product list on the Website so that don't show it again
- Show you when you're logged in to the Website
- To provide and show embedded video content

Targeting

These Cookies are used to track your visit to our Website and other websites, including the pages you have visited and the links you have

followed, which allows third parties to display targeted ads to you on the websites you visit. We and our third-party service providers use Targeting Cookies to:

- Link to social networks, like Facebook, that may subsequently use information about your visit to our website in order to provide advertising or other offers that may be of interest to you when you visit other websites.
- Provide third-parties with information on your visit so that they can
 present you with advertisements or other offers that may be of interest to
 you.

Accepting these Cookies is a condition of using KeenTools Website, so if you prevent these Cookies the Website may not work correctly and we may not be able to provide our services and products to you. If You do not agree to its terms, do not use the KeenTools Website.

If you have questions about Cookies, You can contact us via this email: privacy@keentools.io

Managing First-Party Cookies with your Browser Settings

If you would like to control the first-party cookies on our Services, you can use your browser to enable, disable, or delete cookies. To do this, follow the instructions provided by your browser (usually located within the 'Help', 'Tools', or 'Edit' settings). However, please be aware that if you setup your browser to disable cookies, you may not be able to access secure areas of the Services and other parts of the Services may also not work properly.

Many browser manufacturers provide helpful information about cookie management, including, but not limited to:

- Google Chrome
- Mozilla Firefox
- Apple Safari

- Android Browser
- Opera
- Microsoft Edge

If you use a different browser, please refer to your browser's documentation. You can also find out more about how to change your browser cookie settings at allaboutcookies.org.

Third-Party Services

Some of the services we provide, such as Marketing Campaigns, our Website, etc., make use of Third-Party Services outlined below.

Provision of services and their uninterrupted delivery:

- Webflow for websites building and data storage
- Amazon AWS for hosting and maintaining KeenTools Software
- YouTrack for error reporting

Purchasing process:

Paddle - for collecting payments

Anonymous and personalized analytics:

- Google Analytics & Tag Manager for collecting analytics about website usage
- Rebrandly for short link management
- Facebook Pixel for collecting analytics about website usage by members of our Facebook community

Online and offline surveys:

- SurveyMonkey
- Google Forms

Communication:

- Gmail for sending security and administrative messages
- Yandex Mail for sending support emails
- Freshdesk for managing support emails
- SendPulse for sending license and administrative emails
- Amazon SES for sending license and notification emails
- MailChimp for marketing and promotion email-campaigns

Promotions and social media:

- Google Adwords for running ad campaigns
- YouTube for hosting video content
- Facebook for posting news and communicating with our users
- Instagram for posting news, images and video content
- Twitter for positing news and updates
- Reddit for posting news, updates and communicating with our users
- Linkedin for posting news, updates and communicating with our users

Use of Log Files

KeenTools gathers certain information automatically and stores it in log files. This information includes an anonymized internet protocol address as well as browser, internet service provider, referring/exit pages, search terms, operating system, date/time stamp, and clickstream data. Otherwise, we generally use this information as we would any Usage Data, to analyze trends, administer and maintain the Service, or track usage of various features within the Service.

Data Retention and Your Protection Rights

We would like to make sure you are fully aware of all of your data protection rights. If at any time you choose to cease using KeenTools Products, you may ask for your data to be removed from our servers by sending a request to privacy@keentools.io. After the data removal, we may keep pseudonyms of your

personal data solely for a record about the data removal. Generally, we retain your data as long as we need to in order to achieve the purpose for which it was collected.

We may retain your information if it is required to comply with legal obligations and/or defense in case of violation of KeenTools End-User License Agreement and/or Privacy Policy. We may also have copies of your information in application logs and/or backups made for security and support purposes if this is mentioned in a KeenTools End-User License Agreement or consent text accepted before the personal data collection. These backups will not be accessible as separately delineated information. We may store data pertaining to a customer or user for as long as they are entitled to a license or usage of KeenTools Products. Furthermore, we may keep the data to protect ourselves from damage in case of litigation in accordance with the current legislation. Please note, however, that you must retain a copy of all data that you have placed on our servers in the case of any loss; furthermore, if you cease using our software and/or services, we will not be responsible for retention of any of your data.

As permitted by applicable law, EU residents may request a copy of the information that we hold about them. To do so, please contact us via privacy@keentools.io to ask for that. We may charge a fee in accordance with applicable law for this service.

Moreover, as set out in locally applicable personal data protection law, you may have:

The right to access

You have the right to request Us copies of your personal data from Us. However, this is not an absolute right and the interests of other individuals may restrict your right of access. Furthermore, you may have the right to obtain a copy of your personal data undergoing processing. For additional copies requested, we may charge a reasonable fee based on administrative costs.

• The right to rectification

You have the right to request KeenTools to correct and complete your personal information that you believe is inaccurate and/or incomplete by providing a supplementary statement.

The right to erasure (the right to be forgotten)

You have the right to request Us to erase your personal data, under certain conditions.

The right to restrict processing

You have the right to request that KeenTools restrict the processing of your personal data, under certain conditions. In this case, the respective personal data will be marked and may only be processed by us for certain purposes.

The right to personal data portability

Under certain circumstances, you may have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used, and machine-readable format, and to transmit this personal data to another entity.

The right to object

Under certain circumstances, you may have the right to object, on grounds relating to their particular situation, at any time to the processing of your personal data by us and we can be required to no longer process your personal data.

These rights can be exercised via the email address privacy@keentools.io

Personal Information Security

KeenTools takes reasonable steps to help protect your personal information in an effort to prevent loss, misuse, and unauthorised access, disclosure, alteration and destruction. It is your responsibility to protect your usernames and passwords to help prevent anyone from accessing or abusing your accounts and services. You should not use or reuse the same passwords you use with other accounts as your password for our services.

Children 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 via privacy@keentools.io. 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.

We also may limit how We collect, use, and store some of the information of Users between 13 and 18 years old. In some cases, this means We will be unable to provide certain functionality of the Service to these users.

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

KeenTools Websites may contain links to other websites provided by third-parties which are not under KeenTools control. When following a link and providing information to a third-party website, please be aware that KeenTools is not responsible for the data provided to that third party. This Privacy Policy only applies to KeenTools Websites, so when you visit other websites, even when you click on a link posted on KeenTools Websites, you should read their own privacy policies.

Your California Privacy Rights

Under California Consumer Privacy Act (CCPA), California residents are entitled to ask us for a notice identifying the categories of Personal Information which we share with our affiliates and/or third parties for marketing purposes, and providing contact information for such affiliates and/or third parties.

If you are a California resident and would like a copy of this notice, please submit a written request to: privacy@keentools.io. We may charge a reasonable fee in accordance with applicable law for this service.

Changes to this Privacy Policy

We may update our Privacy Policy from time to time, so please be sure to check back periodically. We will notify You of any changes by posting the new Privacy Policy on this page and on KeenTools Website.

If we make any changes to this Privacy Policy that materially affect our practices with regard to the personal information we have previously collected from you, we will endeavor to provide you with an advance notice of such change by highlighting the change on KeenTools Website.

Reaching Out

If you have any questions about this Privacy Policy, You can always contact us via email privacy@keentools.io.