



## PRIVACY POLICY

Horizon Ingenuity LLC, (collectively, “Horizon Ingenuity”, “us”, “our”, “we” or “Company”), respect the privacy of our customers, business partners and other visitors to our website who may choose to provide Personal Information (as defined below) and are committed to respect their privacy. We recognize the need for appropriate protections and management of Personal Information that you provide to us. This Privacy Policy applies to all information collected about you by Horizon Ingenuity, regardless of how it is collected or stored. This policy covers the types of information collected, how your information may be used, with whom the information may be shared, and how your information is protected.

Except as otherwise noted in this Privacy Policy, Horizon Ingenuity is a data controller (as that term is used under the EU General Data Protection Regulation (“GDPR”)), which means that we decide how and why the information you provide to us is processed. This Policy may be amended or updated from time to time to reflect changes in our practices with respect to the Processing of your information, or changes in applicable law. We encourage you to read this Policy carefully, and to regularly check this page to review any changes we might make.

### What information do we collect?

We may collect information about you directly from you, and automatically through your use of our Services.

We do not require that customers, partners, or other visitors to our site provide us with Personal Information and you may visit our site anonymously. We do not collect Personal Information when you visit our site unless you choose to provide it to us (except for certain IP analysis, conducted by 3rdparty analytical services—see link to their privacy policy below). The decision to provide Personal Information is voluntary and you may withdraw your consent at any time by contacting us here. However, if you do not provide the Personal Information requested, you may not be able to proceed with the activity or receive the benefit



for which the Personal Information is being requested (including, without limitation, the support services).

## How we use the information we collect?

Any information we collect from you may be used in any of the following ways:

To provide our Products and Services to you, to communicate with you about your use of our Products and Services, to respond to your inquiries, to fulfill your orders, and for other customer service purposes.

Your Personal Information will not be sold, exchanged, transferred or given to any company outside Horizon Ingenuity or our trusted third-party service providers for any reason whatsoever, without your consent, other than for the express purpose of delivering the product(s) or service requested, and as otherwise explicitly set forth herein.

We may send periodic informational or promotional content. However, you can always unsubscribe or choose not to receive promotional information from us by following the specific instructions in the email you receive or by notifying us via the appropriate method below. It may take a reasonable period of time to process your request, no longer than 30 days for direct mail and telephone promotions and 10 business days for email promotions.

Your information helps us to respond more effectively to your customer service requests and support needs. We continually strive to improve our site offerings based on the information and feedback we receive from you to perform research, technical diagnostics and analytics with regards to the website.

We may disclose Personal Information, or any information you submitted if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable law, regulation, legal process or governmental request; (ii) enforce our policies, including investigations of potential violations thereof; (iii) investigate, detect, prevent or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues; (iv) to establish or exercise our rights to defend against legal



claims; (v) prevent harm to the rights, property or safety of us, our users, yourself or any third party; or (vi) for the purpose of collaborating with law enforcement agencies or in case we find it necessary in order to enforce intellectual property or other legal rights.

We strive to keep your Personal Information accurate. We have implemented technology, management processes and policies to maintain data integrity. We will provide you with access to your information when reasonable, or in accordance with relevant laws, the opportunity to change your information. To protect your privacy and security, we will take steps to verify your identity before granting access or making changes to your data. Requests to delete Personal Information are subject to any applicable legal and ethical reporting or document retention obligations. To access and/or correct information, you can notify us via the appropriate method below.

## With whom we share the information we collect?

We do not sell, trade or otherwise transfer Personal Information to outside parties (except to the third parties with whom we have contracted to provide services to us, as detailed in the section below).

We use third parties, such as trackers, to compile aggregate data about site traffic and site interaction for marketing and targeting purposes, to assist us in better understanding our site visitors so that we can offer better site experiences and tools in the future. These service providers are not permitted to use the information collected on our behalf except for the purpose of providing the services to us.

In most cases, we will not receive the information these third parties collect but only receive the analysis or results that we requested, and the sole holders of the collected information are the third parties.

Also, we may release your Personal Information when we believe release is appropriate to comply with the law, enforce our site policies or protect ours or others' rights, property or safety.



## How long do we retain Personal Information?

At any time, you may request to view, change or delete your Personal Information by contacting us through our website:

<https://www.horizoningenuity.com/contact>

Due to the possibility of long sales cycles, one never knows when a potential client will re-engage with Horizon Ingenuity and having the background and history of the contracting party will assist Horizon Ingenuity in providing a better service. Therefore, please note that unless you instruct us otherwise, we will retain the Personal Information we collect for as long as needed to provide our services and to comply with our legal obligations, resolve disputes and enforce our agreements.

We may rectify, replenish, or remove incomplete or inaccurate information, at any time and at our own discretion.

## How do we safeguard and transfer your information?

We are committed to use our reasonable efforts, in accordance with market best practices, to ensure the security, confidentiality and integrity of the Personal Information you choose to provide us. Access to the Personal Information is based on the 'least to know' concept together with role-based access control systems, ensuring only authorized access to the Personal Information. To protect the privacy of any Personal Information you may have provided, we are using data hosts who implement market best practice security measures. Although we take steps to safeguard such information, we cannot be responsible for the acts of those who gain unauthorized access, and we make no warranty, express, implied or otherwise, that we will prevent such access. If a password is used to help protect your accounts and Personal Information, it is your responsibility to keep your password confidential.



## What are your rights?

You may contact us here at <https://www.horizoningenuity.com/contact> and request:

To view, delete, change or update any personal data relating to you (for example, if you believe that your Personal Information is incorrect, you may ask to have it corrected).

To opt out of such communications by following the opt-out instructions contained in the email. If you opt out of receiving emails about recommendations or other information we think may interest you, we may still send you emails about your account or any Products and you have requested or received from us.

If you wish to raise a complaint about how we have handled your Personal Information, you can contact us as set forth below.

## Contacting Us

If there are any questions regarding this Privacy Policy or the information that we collect about you, or if you feel that your privacy was treated not in accordance with this Privacy Policy, you may contact us at <https://www.horizoningenuity.com/contact>.

## Updates or amendments to the Privacy Policy

This Policy is current as of the last updated date set forth below. We may revise this Privacy Policy from time to time, in our sole discretion, and the most current version will always be posted on the website. We encourage you to review this Privacy Policy regularly for any changes.

Last updated: November 22, 2022.