

PRIVACY POLICY

PREAMBLE

This Privacy Policy covers practices of FOCUSFRAME LP (a company incorporated under the laws of Canada, hereinafter – “Company”) regarding the collection, use, and share of personal information of you (hereinafter – “You,” “Your”) and applies to Your use of <http://focusframelp.com> (hereinafter – “Website”), the Website Materials, services offered through the Website (hereinafter – collectively with the Website, the “Services”).

PERSONAL INFORMATION

Personal information refers to any data about you as an identified or identifiable natural person. An identifiable person is one who can be directly or indirectly identified, particularly through reference to an identifier.

When necessary, the Company may gather, share, and use the following types of personal information:

1. **Technical Information:** includes your Internet Protocol (IP) address, login data, browser type and version, time zone settings and location, browser plug-in types and versions, operating system and platform, and other technologies on the devices used to access the Website.
2. **Contact Information:** includes email addresses and telephone numbers.
3. **Identity Information:** includes first and last names, maiden names, usernames or similar identifiers, marital status, title, date of birth, and gender.

4. **Usage Data:**

Includes information on how you use the Company’s Services and navigate the Website. This data may not always include personally identifiable information and may cover:

- ✓ Your visit details, such as full Uniform Resource Locators (URLs), clickstreams to, through, and from the Website (including date and time).
- ✓ Page response times, download errors, length of visits to specific pages, and page interaction details (e.g., scrolling, clicks, and mouse-overs).
- ✓ Methods used to navigate away from pages and other browsing activity.

5. **Marketing and Communications Information**

Includes your preferences for receiving marketing materials from the Company and your communication preferences with the Company.

This information helps the Company provide its services, improve user experiences, and meet legal and operational needs.

HOW THE COMPANY GATHERS, SHARES, AND USES YOUR PERSONAL INFORMATION

The Company may gather, share, and use your personal information as an effect of your use of its Services. Below is an outline of how this information is handled:

Storage of Personal Information

Personal information gathered through cookies is typically stored for a limited period (usually no more than one year) and then: deleted automatically; de-identified and retained indefinitely for statistical purposes.

Some data gathered via cookies may not identify you and is used for broader Website improvements.

Collection and Use of Personal Information

1. **Purpose of Collection:**

- To optimize and enhance the performance and usability of the Website.
- To deliver accurate Website Materials.

- To provide law enforcement with necessary information for criminal investigations in the event of cyber-attacks.
- To maintain the security and long-term viability of the Company's information technology systems.

2. **Examples of Use:**

Ensuring personal information is processed for legitimate business interests, such as monitoring and enhancing the Website, and protecting the Company from risks.

Combining usage data to measure how many users access a specific Website feature.

3. **Aggregated Data Usage:**

The Company gathers and uses Aggregated Data for statistical or demographic purposes.

- When Aggregated Data is integrated with personal information in a way that identifies you, it is treated as personal information and used in accordance with this Privacy Policy.
- If this data is anonymized and de-identified, it may be used to analyze user behavior without revealing individual identities.

Fraud Prevention and Compliance

The Company and its partners may use your personal Information for:

- ✓ Know Your Client (KYC) checks.
- ✓ Anti-Money Laundering (AML) and Counter-Terrorist Financing (CFT) checks.
- ✓ Credit checks and fraud prevention.

Communication Purposes

Your contact information may be used for communication, including: system emails; marketing emails.

Cookies and Tracking

Cookies are used to collect some of the aforementioned data. The use of cookies requires your consent and is aligned with the timeframes set for cookie expiration.

Legal Claims

Your personal information may be used for establishing, exercising, or defending legal claims.

This is justified by the Company's legitimate interest in protecting its legal rights, as well as your legal rights and those of third parties.

Sharing of Personal Information

1. **Service Partners:**

The Company collaborates with partners and service providers to operate its business.

Partners will have access only to the information necessary to perform their tasks and are bound to handle it responsibly.

Your personal information may be shared with these entities to fulfill service obligations.

2. **Third Parties:**

Your personal information may be shared with service providers, affiliates, business partners, and other third parties involved in Service provision.

This policy ensures that your personal information is managed responsibly and in compliance with applicable legal and ethical standards.

THE GOALS OF GATHERING AND USE

Your personal information may be requested and collected by the Company for the following purposes:

- **Service Provision:** To provide and maintain the Company's Services.
- **Protection:** To safeguard the Company's rights and interests.
- **Legal Compliance:** To fulfill the Company's legal obligations.

- **Security:** To detect, prevent, and address malicious or fraudulent activity.
- **Advertising:** To support and enhance advertising initiatives.
- **Government Requests:** To respond to inquiries or demands from state authorities.

LINKS TO THIRD-PARTY WEBSITES

Our Website may include links to websites operated or provided by third parties. These links are offered solely for your convenience, and the Company does not endorse or recommend any products, services, or information featured on these third-party websites.

The Company disclaims all liability for:

- Any content that may be accessed via third-party links on this Website.
- Information, materials, products, or services posted or offered on any linked third-party websites.
- The quality, reliability, or functionality of any product or service featured on such third-party websites.

Furthermore, the Company disclaims liability for any failures, defects, or issues with products or services offered or advertised on these third-party websites.

ACCESS OF THIRD PARTIES

1. Authorized Use by Third Parties:

The Company may share your personal information with chosen third parties, such as: Service providers, business partners, suppliers, agents, and contractors.

These parties are obligated to handle your personal information with the same level of care as the Company.

2. Sharing Personal Information with Third Parties

Your personal information may be shared with third parties:

- To conform with legal obligations imposed on the Company.
- As needed to perform Services for which those third parties were involved.

3. Disclosure in Specific Circumstances

Your personal information may be disclosed to third parties:

- As part of any business restructuring or reorganization.
- When required by law or legal obligations.

4. Third-Party Tools and Software

The Company may use third-party programs and software for reasons including:

- Creating and maintaining mailing lists.
- Gathering data through web forms.
- Sharing links on social media.

You are strongly encouraged to review these providers' privacy policies to ensure you consent to their gathering and use of your personal information.

The Company is not liable for the privacy practices or policies of such third-party service providers.

RETENTION OF PERSONAL INFORMATION

You undertake that the Company will retain your personal information for as long as necessary to fulfil the purpose(s) for which it was gathered and for any other legally permitted related purposes.

1. Retention Duration:

The duration of data retention is determined by the Company's business needs.

Personal information that is no longer required will be either: irreversibly anonymized (allowing the anonymized data to be stored indefinitely); safely deleted.

2. Retention for Multiple Purposes

If your personal information is used for multiple reasons, it will be retained until the reason with the longest retention period has been fulfilled.

Usage for purposes with shorter retention periods will cease once those periods expire.

This approach ensures that your personal information is retained responsibly and only for as long as necessary for legitimate business or legal purposes.

YOUR RIGHTS

This section applies to residents of the European Economic Area (EEA) and the United Kingdom (UK). You have certain rights under applicable laws, including the General Data Protection Regulation (GDPR). You can learn more about your rights under the GDPR on the European Commission's website: https://commission.europa.eu/law/law-topic/data-protection_en.

Your Rights Explained

1. Right to Rectification:

- You can query corrections for inaccuracies in your personal information.
- You also have the right to have any incomplete personal information completed.
- It is important to keep your personal information accurate and up-to-date. Please inform the Company of any changes to your information.

2. Right to Access:

- You have the right to query acknowledgment from the Company about whether your personal information is being processed.
- You also have the right to access your personal information under specific conditions.

3. Right to Restrict Processing:

- You may query that the processing of your personal information is restricted under certain conditions, in addition to or as an alternative to deletion.

4. Right to Erasure ('Right to be Forgotten'):

- You can query the deletion of your personal information in general and in specific conditions.

5. Right to Data Portability:

- You can query that the Company provides your personal information in a structured, commonly used, and machine-readable format.
- You may also query that the Company transfers your data directly to another entity where technically feasible.

6. Right to Object to Processing:

You have the right to object to the processing of your personal information in specific conditions, such as for direct marketing reasons or based on the Company's legitimate interests.

These rights empower you to have greater control over your personal information. If you wish to exercise any of these rights, please contact the Company directly.

COOKIES AND WEB BEACONS

1. Definition of Cookies

Cookies are small text files that uniquely identify you as a user and store both your personal preferences and technical information.

They are used to manage and monitor the performance of advertising shown on or via the Website or other platforms.

2. Types of Cookies

Permanent Cookies: Remain on your computer or mobile device until manually deleted.

Transient Cookies: Automatically expire after a set period or when you close your browser.

3. Use of Cookies by the Company

The Company, its affiliates, third-party service providers, and business partners may utilize cookies or similar technologies to enhance your online experience.

Adobe Flash Player and similar tools may use cookies to remember user settings and preferences. Flash cookies cannot be controlled via your web browser but can be managed using Adobe's Flash control tools.

4. Web Beacons:

Web beacons are small pieces of code embedded in web pages or emails that allow the Company to track user interactions.

They collect information such as:

- IP address of the device accessing the page.
- URL of the page containing the Web beacon.
- Time and duration of page views.
- Browser type and unique identification number.

In HTML-capable emails, Web beacons can help the Company determine if the email was opened and viewed.

5. Consent for Use:

By accepting this Privacy Policy, you explicitly consent to the Company's use of cookies and Web beacons to enhance functionality, improve your experience, and track advertising performance.

6. Connection to Personal Information:

Cookies and Web beacons do not inherently store personally identifiable information. However, if you provide such information, it may be associated with data collected through cookies and Web beacons.

This policy ensures transparency about how cookies and Web beacons are used and emphasizes the importance of user consent in their application.

PRIVACY POLICY MODIFICATIONS AND USER CONSENT

1. **Refusal of Consent:** if you do not agree with this Privacy Policy, you should refrain from providing any personal information to the Company and avoid using the Website or its Services.

2. User Responsibility

It is your sole responsibility to stay informed about any updates to this Privacy Policy. The Company encourages you to review this policy regularly.

The Company does not provide any notifications of changes beyond publishing updates on the Website.

3. Consent to Data Collection and Use

By visiting this Website, you agree to the Company's collection and use of your personal information as outlined in this Privacy Policy.

4. Policy Modifications

This Privacy Policy may be modified at any time. Any changes will take effect immediately upon their publication on the Website.

The Company reserves the right to amend or modify this Privacy Policy at any time by publishing the updated version on the Website.

5. Your Responsibility

You are solely liable for regularly reviewing the Website to stay informed about any amendments to this Privacy Policy.

By continuing to use or access the Company's Website or Services after any modifications are published, you agree to and accept the updated Privacy Policy.

LEGAL INFORMATION

This Privacy Policy has been prepared based on provisions of multiple legislations, including Regulation (EU) 2016/679 (GDPR).

CONTACTS

For any inquiries related to this Privacy Policy, the Website, or Services, please contact the Company via email at: info@focusframelp.com.