

# Privacy Policy

SUGi built the SUGi app as a Free app. This SERVICE is provided by SUGi at no cost and is intended for use as is.

This page is used to inform visitors regarding our policies with the collection, use, and disclosure of Personal Information if anyone decided to use our Service.

If you choose to use our Service, then you agree to the collection and use of information in relation to this policy. The Personal Information that we collect is used for providing and improving the Service. We will not use or share your information with anyone except as described in this Privacy Policy.

The terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, which is accessible at SUGi unless otherwise defined in this Privacy Policy.

## **WHO WE ARE AND HOW TO CONTACT US**

SUGi LLC is the Controller (for the purposes of the GDPR) of your Personal Data (referred to as either "website", "we", "us" or "our" in this Privacy & Cookies Policy).

If you have any questions about our practices or this Privacy & Cookies Policy, please contact us at [hello@sugiproject.com](mailto:hello@sugiproject.com) .

## **THE TYPE OF PERSONAL DATA WE COLLECT**

We collect the following Personal Data when you visit our website and use our services:

Data provided to us by you directly, including but not limited to name and email address, when filling out an online form, supporting a project, donating for a project, sending us a message on our contact page or signing up for our email updates.

Data provided to us automatically e.g. from Cookies, such as which browser you are using, which type of device you are using, which pages you visit, how often you visit the website, etc.

The app does use third-party services that may collect information used to identify you.

Link to the privacy policy of third party service providers used by the app

- [Google Play Services](#)
- [Firebase Analytics](#)
- [Facebook](#)
- [Stripe](#)

## **LOG DATA**

We want to inform you that whenever you use our Service, in a case of an error in the app we collect data and information (through third-party products) on your phone called Log Data. This Log Data may include information such as your device Internet Protocol ("IP") address, device name, operating system version, the configuration of the app when utilizing our Service, the time and date of your use of the Service, and other statistics.

## **HOW WE USE PERSONAL DATA**

We process Personal Data to pursue our legitimate interest to run, maintain and develop our business. Furthermore, we process Personal Data to comply with our legal obligations. We use the collected Personal Data for the following purposes:

Providing services. We may use your Personal Data to provide you with our services, to process your requests or as otherwise may be necessary to perform the contract between you and SUGi LLC.

Developing and managing services. We may use your Personal Data in data analysis to develop and manage our services, customer care, sales, and marketing.

Communicating with you. We may use your Personal Data to communicate with you, for example, to inform you about our services and to contact you for customer care related purposes.

Marketing, advertising and making recommendations. We may contact you to inform you of new services or promotions we may offer and to conduct market research when we have your consent or it is otherwise allowed. We may use your Personal Data to personalize our offering and to provide you with more relevant services.

## WHO WE SHARE YOUR PERSONAL DATA WITH

We may employ third-party companies and individuals due to the following reasons:

1. To facilitate our Service;
2. To provide the Service on our behalf;
3. To perform Service-related services; or
4. To assist us in analyzing how our Service is used.

We want to inform users of this Service that these third parties may have access to your Personal Information. The reason is to perform the tasks assigned to them on our behalf. However, they are obligated not to disclose or use the information for any other purpose.

**Service Providers.** When providing support for our services, including, for example, website and application development, hosting, maintenance, backup, storage, virtual infrastructure, payment processing, analysis, identity verification, background and

compliance reviews, fund administration, banking services, and other services for us, they may require to access or use Personal Data about you.

**Professional Advisers.** Lawyers, accountants, bankers, auditors, and insurers may need to review your Personal Data to provide consultancy, compliance, banking, legal, insurance, accounting, and similar services.

**Legal and Taxing Authorities, Regulators and Participants in Judicial Proceedings.** We may disclose your Personal Data if we believe it is reasonably necessary to comply with a law, regulation, order, subpoena, rule of a self-regulatory organization or audit or to protect the safety of any person, to address fraud, security or technical issues, or to protect our legal rights, interests and the interests of others.

## HOW WE PROTECT PERSONAL DATA

We commit to ensuring that such data is held securely, used appropriately and retained no longer than is necessary for the purposes for which the data is collected.

We store Personal Data on secure servers that are managed by us and our service providers. Personal Data that we store or transmit is protected by security and access controls, including username and password authentication, two-factor authentication, and data encryption where appropriate.

In order to protect your information, we take care where possible to work with subcontractors and service providers who we believe maintain an acceptable standard of data security compliance.

## WHAT ARE YOUR RIGHTS

You have the following Personal Data protection rights:

**Right to access your Personal Data.** If you are within the EU, this enables you to receive a copy of the Personal Data we hold about you.

**Right to rectification of the Personal Data that we hold about you.** This enables you to have any incomplete or inaccurate information we hold about you corrected.

**Right to object the processing of your Personal Data.** This right exists where we are relying on legitimate interest as the legal basis for our processing and there is something about your particular situation, which makes you want to object to the processing of your Personal Data on this ground.

**Right to the restriction of processing of your Personal Data.** This enables you to ask us to suspend the processing of Personal Data about you, for example if you want us to establish its accuracy or the reason for processing it.

**Right to data portability.** If you are within the EU, we will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Right to withdraw consent.** This right only exists where we are relying on consent to process your Personal Data. If you withdraw your consent, we may not be able to provide you with access to the certain specific functionalities of our site. We will advise you if this is the case at the time you withdraw your consent.

**Right to erasure of your Personal Data.** This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it.

## **HOW TO EXERCISE YOUR RIGHTS**

To exercise any of the above-mentioned rights you can primarily use the functions offered by our services. If such functions are however not sufficient, you can contact us using by sending a message to [hello@sugiproject.com](mailto:hello@sugiproject.com) .

We may request additional information necessary to confirm your identity. We may reject requests that are unreasonably repetitive, excessive or manifestly unfounded.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **COOKIES**

Cookies are files with a small amount of data that are commonly used as anonymous unique identifiers. These are sent to your browser from the websites that you visit and are stored on your device's internal memory.

This Service does not use these “cookies” explicitly. However, the app may use third party code and libraries that use “cookies” to collect information and improve their services. You have the option to either accept or refuse these cookies and know when a cookie is being sent to your device. If you choose to refuse our cookies, you may not be able to use some portions of this Service.

## **SECURITY**

We value your trust in providing us your Personal Information, thus we are striving to use commercially acceptable means of protecting it. But remember that no method of transmission over the internet, or method of electronic storage is 100% secure and reliable, and we cannot guarantee its absolute security.

## **LINKS TO OTHER SITES**

This Service may contain links to other sites. If you click on a third-party link, you will be directed to that site. Note that these external sites are not operated by us. Therefore, we strongly advise you to review the Privacy Policy of these websites. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

## **CHILDREN'S PRIVACY**

These Services do not address anyone under the age of 13. We do not knowingly collect personally identifiable information from children under 13. In the case we discover that a child under 13 has provided us with personal information, we immediately delete this from our servers. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us so that we will be able to do necessary actions.

## **CHANGES TO THIS PRIVACY POLICY**

We may update our Privacy Policy from time to time. Thus, you are advised to review this page periodically for any changes. We will notify you of any changes by posting the new Privacy Policy on this page. These changes are effective immediately after they are posted on this page.

## **CONTACT US**

If you have any questions or suggestions about our Privacy Policy or to request total removal of your private data, please contact us at **[hello@sugiproject.com](mailto:hello@sugiproject.com)**