

PRIVACY POLICY

We at Proxima Research LLC (“*Proxima Research*,” “*we*,” or “*us*”) and our affiliates are committed to protecting your privacy.

This Privacy Policy explains how Proxima Research collects, uses, and discloses information about you. This Privacy Policy applies when you use our website(s), mobile application(s), and other products and services covered by this Privacy Policy (collectively, our “*Services*”), contact our customer service team, engage with us on social media, or otherwise interact with us.

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the bottom of this policy and, in some cases, we may provide you with additional notice (such as adding a statement to our website or providing you with a notification). We encourage you to review this Privacy Policy regularly to stay informed about our information practices and the choices available to you.

CONTENTS

- Collection of Information
- Use of Information
- Sharing of Information
- Third-Party Embeds
- Transfer of Information to the United States and Other Countries
- Your Choices
- Your California Privacy Rights
- Additional Disclosures for Individuals in Europe
- Contact Us

COLLECTION OF INFORMATION

Information You Provide to Us

We collect information you provide directly to us. For example, you share information directly with us when you create an account, fill out a form, purchase services, communicate with us via third-party platforms, request customer support, or otherwise communicate with us. The types of personal information we may collect include your name, email address, business information, and any other information you choose to provide.

In some cases, we may also collect information you provide about others, such as when you fill out a form on our site on behalf of someone else. We will use this information to fulfill your request and will not send communications to your contacts unrelated to your request, unless they separately consent to receive communications from us or otherwise engage with us.

We do not collect payment information through our Services. We rely on third parties to process payments in connection with our Services. Any information you provide to facilitate such a payment is subject to the third-party payment processor’s privacy policy, and we encourage you to review this policy before you provide any information to the payment processor.

Information We Collect Automatically When You Interact with Us

In some instances, we automatically collect certain information, including:

- ***Transactional Information:*** When you purchase a service, we collect information about the transaction, such as purchase details, purchase price, and the date of the transaction.
- ***Device and Usage Information:*** We collect information about how you access our Services, including data about the device and network you use, such as your hardware model, operating system version, mobile network, IP address, unique device identifiers, browser type, and app version.
- ***Information Collected by Cookies and Similar Tracking Technologies:*** We use tracking technologies, such as cookies and web beacons, to collect information about you. Cookies are small data files stored on your hard drive or in device memory that help us improve our Services and your experience, see which areas and features of our Services are popular, and count visits. Web beacons (also known as “pixel tags” or “clear GIFs”) are electronic images that we use on our Services and in our emails to help deliver cookies, count visits, and understand usage. We also work with third party analytics providers who use cookies, web beacons, device identifiers, and other technologies to collect information about your use of our Services and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in mobile apps, and links clicked. This information may be used by Proxima Research and others to, among other things, analyze and track data, deliver content targeted to your interests on our Services, and better understand your online activity. For more information about cookies and how to disable them, see Your Choices below.

Information We Collect from Other Sources

We obtain information from third-party sources. For example, we may collect information about you from social networks, accounting services providers and data analytics providers.

Information We Derive

We may derive information or draw inferences about you based on the information we collect. For example, we may make inferences about your location based on your IP address or infer reading preferences based on your reading history.

USE OF INFORMATION

We use the information we collect to provide, maintain, and improve our Services. We also may use the information we collect to:

- Process transactions and send related information, such as confirmations, receipts, and user experience surveys;
- Send you technical notices, security alerts, and support and administrative messages;
- Respond to your comments and questions and provide customer service;
- Monitor and analyze trends, usage, and activities in connection with our Services;
- Detect, investigate, and prevent security incidents and other malicious, deceptive, fraudulent, or illegal activity and protect the rights and property of Proxima Research and others;
- Comply with our legal and financial obligations; and
- Carry out any other purpose described to you at the time the information was collected.

SHARING OF INFORMATION

We share personal information in the following circumstances or as otherwise described in this policy:

- We may share personal information with vendors, service providers, and consultants that need access to personal information in order to perform services for us, such as companies that assist us with web hosting, storage, and other infrastructure, analytics, payment processing, fraud prevention and security, customer service, communications, and marketing.

- We may disclose personal information if we believe that disclosure is in accordance with, or required by, any applicable law or legal process, including lawful requests by public authorities to meet national security or law enforcement requirements. If we are going to disclose your personal information in response to legal process, we will give you notice so you can challenge it (for example by seeking court intervention), unless we are prohibited by law or believe doing so may endanger others or cause illegal conduct. We will object to legal requests for information about users of our Services that we believe are improper.
- We may share personal information if we believe that your actions are inconsistent with our user agreements or policies, if we believe that you have violated the law, or if we believe it is necessary to protect the rights, property, and safety of Proxima Research, our users, the public, or others.
- We share personal information with our lawyers and other professional advisors where necessary to obtain advice or otherwise protect and manage our business interests.
- We share personal information with your consent or at your direction.
- We also share aggregated or de-identified information that cannot reasonably be used to identify you.

THIRD-PARTY EMBEDS

Proxima Research does not host some of the content displayed on our Services. Users have the ability to post content that is actually hosted by a third party, but is embedded in our pages (an “*Embed*”). When you interact with an Embed, it can send information about your interaction to the hosting third party just as if you were visiting the third party’s site directly. For example, when you load a Proxima Research post page with a YouTube video Embed and watch the video, YouTube receives information about your activity, such as your IP address and how much of the video you watch. Proxima Research does not control what information third parties collect through Embeds or what they do with the information. This Privacy Policy does not apply to information collected through Embeds. The privacy policy belonging to the third party hosting the Embed applies to any information the Embed collects, and we recommend you review that policy before interacting with the Embed.

TRANSFER OF INFORMATION TO OTHER COUNTRIES

Proxima Research is headquartered in the United States, and we have operations and service providers in the United States and other countries. Therefore, we and our service providers may transfer your personal information to, or store or access it in, jurisdictions that may not provide levels of data protection that are equivalent to those of your home jurisdiction. We will take steps to ensure that your personal information receives an adequate level of protection in the jurisdictions in which we process it.

YOUR CHOICES

Account Information

You may access, correct, delete, and export your account information at any time by contacting us at info@proximaresearch.com. Please note that if you choose to delete your data, we may continue to retain certain information about you as required by law or for our legitimate business purposes.

Cookies

Many web browsers are set to accept cookies by default, and Proxima Research uses CookieYes for its cookie consent management, and you can control your cookie settings by utilizing the CookieYes platform available on this and every other website page.

Communications Preferences

You may opt out of receiving certain communications from us, such as digests, newsletters, and activity notifications, by following the instructions in those communications or the CookieYes platform, as discussed above. If you opt out, we may still send you administrative emails, such as those about your account or our ongoing business relations.

Mobile Push Notifications

With your consent, we may send push notifications to your mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device.

YOUR CALIFORNIA PRIVACY RIGHTS

Applicability

This section applies only to California consumers. For purposes of this section "Personal Information" has the meaning given in the California Consumer Privacy Act ("CCPA"). It describes how we collect, use, and share California consumers' Personal Information in our role as a business, and the rights applicable to such residents. The California Consumer Privacy Act ("CCPA") requires businesses to disclose whether they sell Personal Information. Proxima Research is a business, and does not sell Personal Information. We may share Personal Information with authorized service providers or business partners who have agreed to our contractual limitations as to their retention, use, and disclosure of such Personal Information.

If you are unable to access this Privacy Policy due to a disability or any physical or mental impairment, please contact us and we will arrange to supply you with the information you need in an alternative format that you can access.

How We Collect, Use, and Share your Personal Information

We have collected the following statutory categories of Personal Information in the past twelve (12) months:

- Identifiers, such as name, e-mail address, mailing address, and phone number. We collect this information directly from you or from third party sources.
- Commercial information, such as subscription records. We collect this information directly from you.
- Internet or network information, such as browsing and search history. We collect this information directly from your device.
- Geolocation data, such as IP address. We collect this information from your device.
- Financial information, such as Payment Information or financial account numbers in the process of providing you with a subscription. We collect this information from you.
- Inferences.
- Other Personal Information, in instances when you interact with us online, by phone or mail in the context of receiving help through our help desks or other support channels; participation in customer surveys or contests; or in providing the Subscription Service.

Your California Rights

You have certain rights regarding the Personal Information we collect or maintain about you. Please note these rights are not absolute, and there may be cases when we decline your request as permitted by law.

The right of access means that you have the right to request that we disclose what Personal Information we have collected, used and disclosed about you in the past 12 months.

The right of deletion means that you have the right to request that we delete Personal Information collected or maintained by us, subject to certain exceptions.

The right of correction means that you have the right to request that we correct any inaccurate personal information that we maintain about you.

The right to non-discrimination means that you will not receive any discriminatory treatment when you exercise one of your privacy rights.

Proxima Research does not sell or share Personal Information to third parties (pursuant to California Civil Code §§ 1798.100–1798.199, also known as the California Consumer Privacy Act of 2018).

How to Exercise your California Rights

You can exercise your rights yourself or you can alternatively designate an authorized agent to exercise these rights on your behalf. Please note that to protect your Personal Information, we will verify your identity by a method appropriate to the type of request you are making. We may also request that your authorized agent have written permission from you to make requests on your behalf, and we may also need to verify your authorized agent's identity to protect your Personal Information.

DATA PROTECTION OFFICER

If you have any questions about this Privacy Policy or our privacy practices, or if you have a disability and need to access this notice in a different format:

- contact us on our web-site;
- contact us by postal mail:

Proxima Research LLC

Address: 12 SE 7th St, unit 703,
Fort Lauderdale, FL 33301, USA
EIN: 37-2049031

ADDITIONAL DISCLOSURES FOR INDIVIDUALS IN EUROPE

If you are located in the European Economic Area (“*EEA*”), you have certain rights and protections under applicable law regarding the processing of your personal data, and this section applies to you.

Legal Basis for Processing

When we process your personal data, we will do so in reliance on the following lawful bases:

- To perform our responsibilities under our contract with you (e.g., providing the products and services you requested).
- When we have a legitimate interest in processing your personal data to operate our business or protect our interests (e.g., to provide, maintain, and improve our products and services, conduct data analytics, and communicate with you).
- To comply with our legal obligations (e.g., to maintain a record of your consents and track those who have opted out of non-administrative communications).
- When we have your consent to do so (e.g., when you opt in to receive non-administrative communications from us). When consent is the legal basis for our processing your personal data, you may withdraw such consent at any time.

Data Retention

We store personal data associated with your account for as long as your account remains active. If you close your account, we will delete your account data within 14 days. We store other personal data for as long as necessary to carry out the purposes for which we originally collected it and for other legitimate business purposes, including to meet our legal, regulatory, or other compliance obligations.

Data Subject Requests

Subject to certain limitations, you have the right to request access to the personal data we hold about you and to receive your data in a portable format, the right to ask that your personal data be corrected or erased, and the right to object to, or request that we restrict, certain processing. To exercise your

rights, please utilize the capabilities of the CookieYes platform or email us at info@proximaresearch.com

Questions or Complaints

If you have a concern about our processing of personal data that we are not able to resolve, you have the right to lodge a complaint with the Data Protection Authority where you reside.

OTHER IMPORTANT PRIVACY INFORMATION

We Never Sell Personal Data

We will never sell your Personal Data to any third party.

Information About Children

The websites, product and services are not intended for or targeted at children under 16, and we do not knowingly or intentionally collect Personal Data about children under 16. If you believe that we have collected Personal Data about a child under 16, please contact us, so that we may delete the information.

CONTACT US

If you have any questions about this Privacy Policy, please contact us info@proximaresearch.com