Privacy Policy

Effective Date: 16.11.2026

Welcome to Proxima Research LLC!

We, Proxima Research LLC ("Proxima," "we," or "our"), are committed to protecting your

privacy and complying with applicable U.S. privacy laws, including the California Consumer Privacy Act (CCPA).

This Privacy Policy explains how we collect, use, and share your information when you use our website, mobile apps, and services (collectively, "Services").

1. Information We Collect

1.1. Information You Provide to Us:

We collect the following:

- Contact Information: Name, email address, phone number, and postal address.
- Business Information: Company name, job title, and industry.
- Messages: Data provided in forms or communications with us.

1.2. Information We Collect Automatically:

We collect:

- Log Data: IP address, browser type, pages visited, and timestamps.
- Device Information: Device type, operating system, and unique IDs.
- Cookies and Tracking Technologies: Used to monitor usage and enhance

functionality.

1.3. Information from Third Parties:

We may receive data from social media platforms, analytics providers, or partners.

2. Legal Basis for Processing

We process your information based on:

- Consent: When you explicitly agree to data collection for marketing communications, analytics cookies, surveys, and research participation.
- Contract Performance: To fulfill agreements or provide requested services, process orders, create and manage your account, process payments.
- Legitimate Interests: For business operations and improvements, internal analytics, security of our systems, fraud prevention, direct marketing (with right to opt-out).
- Legal Obligations: Compliance with U.S. federal and state laws, tax reporting, responding to law enforcement requests, court orders.
- Vital Interests: In emergency situations to protect life and health.

You have the right to withdraw your consent at any time. This will not affect the lawfulness of processing based on consent before its withdrawal.

3. How We Use Your Information

We use your information to:

- Provide and improve our Services.
- Process transactions and send relevant updates.
- Respond to inquiries and provide support.
- Detect and prevent fraud.

4. Sharing Your Information

We may share your information with:

- Service Providers: Companies assisting in analytics, hosting, or payment
- processing.
- Legal Authorities: If required by law or to protect our rights.

Third Parties with Consent: When you explicitly approve sharing.

5. Your Rights

5.1 For California Residents (CCPA):

California residents have the following rights:

- Access: Request information we collect about you.
- Deletion: Ask us to delete your personal data.
- Opt-Out: Decline the sale of personal information.
- Non-Discrimination: We will not discriminate against you for exercising your privacy rights.

5.2 For EU Residents (GDPR):

EU residents have the right to:

- Access: Request information about how your data is processed.
- Rectification: Correct inaccurate or incomplete data.
- Erasure: Request deletion of your data ("Right to be Forgotten").
- Restriction: Limit the processing of your data.
- Portability: Receive a copy of your data in a machine-readable format.
- Objection: Object to data processing, including profiling.
- Not to be subject to automated decision-making: Right not to be subject to decisions based solely on automated processing.
- Lodge a complaint: You can file a complaint with your local data protection authority.

5.3 For Kazakhstan Residents:

According to the Law of the Republic of Kazakhstan on Personal Data Protection, you have the right to:

- Know about sources of collection and location of your personal data.
- Demand blocking of illegally processed personal data.
- Withdraw consent for data processing at any time.
- Request information about the presence of your personal data in the database.
- Request clarification on the procedure for protecting your rights.

5.4 For Uzbekistan Residents:

According to the legislation of the Republic of Uzbekistan on personal data, you have the right to:

- Free access to your personal data.
- Request cessation of use of personal data for direct marketing purposes.
- Compensation for material and moral damage caused by illegal processing of personal data.
- Request notification of all third parties about changes made or deletion of personal data.
- Anonymity when using certain types of services.

5.5 For Brazil Residents (LGPD):

Under the Brazilian General Data Protection Law, you have the right to:

- Confirmation of the existence of processing of your personal data.
- Access to your personal data.
- Correction of incomplete, inaccurate or outdated data.
- Anonymization, blocking or deletion of unnecessary or excessive data.
- Data portability to another service or product provider.
- Deletion of personal data processed with the data subject's consent.
- Information about public and private entities with which the controller has

shared data.

- Information about the possibility of not providing consent and the consequences thereof.

5.6 For Ukraine Residents:

According to the Law of Ukraine on Personal Data Protection, you have the right to:

- Know about sources of collection, location of your personal data, purpose of their processing.
- Access to your personal data.
- Demand updating, correction or deletion of your personal data.
- Object to processing of your personal data.
- Protect your personal data from illegal processing and accidental loss.

To exercise your rights, contact us at dataprotection@proximaresearch.com.

6. Cookies and Tracking Technologies

6.1 Use of Cookies

We use cookies and similar technologies, including pixels, tags and scripts, to ensure the proper operation and security of our website, remember user preferences, analyze website traffic and performance and, where applicable, support advertising and marketing activities.

Depending on their purpose, cookies may be strictly necessary, functional, analytical or advertising-related. These technologies may collect information such as device and browser details, IP address, cookie identifiers and information about how you interact with our website.

Information about the cookies actually used, their purposes, providers, categories and retention periods is available through our cookie consent banner or settings interface.

6.2 Consent and Cookie Preferences

We apply cookie consent and preference mechanisms in accordance with applicable law and our cookie management policy. Where prior consent is required, non-essential cookies and related tracking technologies remain disabled until the user provides consent. Where permitted by law, cookies may be used subject to applicable requirements and the user's preferences.

Depending on the available settings, you may accept or reject non-essential cookies, select individual categories and change or withdraw your consent at any time. Strictly necessary cookies may operate without consent where permitted by law and where they are genuinely necessary for the operation or security of the website.

Where required by applicable law, we also provide mechanisms to opt out of the sale or sharing of personal information or its use for targeted advertising, or limit the use of sensitive personal information where applicable and recognize applicable browser-based opt-out signals, including Global Privacy Control (GPC).

6.3 Third-Party Technologies and Retention

Some cookies and similar technologies may be provided by third parties, such as analytics, security, advertising or website functionality providers. Their use is subject to applicable legal requirements and relevant privacy notices.

Cookies may be session-based, expiring when you close your browser, or persistent, remaining on your device for a specified period or until deleted. Retention periods depend on the purpose and configuration of each cookie and may be displayed in the cookie settings interface.

6.4 Further Information

You may also manage or delete cookies through your browser settings, although blocking certain cookies may affect website functionality. Browser settings do not necessarily replace the consent or opt-out mechanisms required by applicable law.

7. Security

We implement safeguards to protect personal data from unauthorized access, alteration, or loss.

8. Data Retention

We retain your personal information for the period necessary to achieve the purposes specified in this Policy or as required by law:

- Account data: During account activity plus 3 years after last activity.
- Transaction and financial data: 5 years in accordance with U.S. tax legislation.
- Marketing data: Until consent is withdrawn or 3 years of inactivity.
- Cookie data: From session cookies (deleted when browser is closed) to a maximum of 2 years.
- Customer support data: 3 years after request resolution.
- Data for legal compliance: According to the periods established by legislation.
- Data for litigation protection: During the statute of limitations plus 1 year.

After the retention period expires, personal data is deleted or anonymized in such a way that it cannot be used to identify a specific person.

9. Children

Our Services are not intended for persons under:

- 16 years old for EU residents
- 18 years old for residents of other jurisdictions, including the United States

We do not knowingly collect personal information from children under the specified age. If you are a parent or guardian and have learned that your child has provided us with personal information without your consent, please contact us at the contacts specified in section 11. We will take necessary measures to remove such information from our systems.

If we become aware that we have accidentally collected personal information from a child, we will immediately delete such information unless we are required to retain it by law.

10. Automated Decision-Making and Profiling

We may use automated systems to process your personal information, including:

10.1 Purposes of automated processing:

- Analysis of service usage to improve functionality and user experience.
- Fraud detection and prevention, ensuring security of our systems.
- Personalization of content, recommendations and marketing offers.
- Creditworthiness assessment when providing services with deferred payment.
- User segmentation for marketing purposes.

10.2 Your rights regarding automated processing:

- You have the right not to be subject to a decision based solely on automated processing if such decision has legal effects for you or similarly significantly affects you.
- You may request human intervention in the decision-making process.
- You have the right to express your point of view and challenge the decision.
- You may request information about the logic of automated decision-making.

10.3 Exceptions:

Automated decision-making may be carried out if it is:

- Necessary for entering into or performance of a contract between you and us.
- Authorized by U.S. federal or state law.
- Based on your explicit consent.

To exercise your rights regarding automated processing, please contact us at

the contacts in section 11.

11. Contact Us

For questions about this Privacy Policy:

Proxima Research LLC

- Email: office.us@proximaresearch.com
- Phone: +1 954 616 56 81
- Address: 12 SE 7th Street, Suite 703, Fort Lauderdale, FL 33301
- Data Protection Officer: dataprotection@proximaresearch.com

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