

# PRIVACY POLICY

Last Updated: June 25, 2023

PROBA INTELLIGENCE, LLC (“PROBA”) wants you to know how we address privacy issues on the PROBA website (the “Site”) and all other websites owned and operated by PROBA. PROBA provides the privacy policy below (“Privacy Policy”) to explain how your (the “User,” “You,” “Your,” or “Visitor”) personal information will be treated by PROBA. PROBA reserves the right to amend this Privacy Policy at any time. Please check back frequently in order to see changes, and Your use of the Site constitutes Your acceptance of the Privacy Policy, as it may be amended from time to time.

## 1. Collection of Personal Information from Site Users

(a) PROBA may collect and/or track (1) the home server domain names, email addresses, type of computer, and type of Web browser of Visitors to the Site, (2) the email addresses of Visitors that communicate with PROBA or the Site via email, (3) information knowingly provided by the Visitor in online forms, registration forms, contact forms, and surveys, (including name, address, email, and other personal profile data), and (4) aggregate and user-specific information regarding page views.

(b) PROBA may place Internet “cookies” on Visitors’ hard drives. Internet cookies save data about individual Visitors, such as the Visitor’s name, password, username, screen preferences, the pages of a site viewed by the Visitor, and the advertisements viewed or clicked by the Visitor. When the Visitor revisits the Site, PROBA may recognize the Visitor by the Internet cookie and customize the Visitor’s experience accordingly. Visitors may decline Internet cookies, if any, by using the appropriate feature of their Web client software, if available; however, this may impair certain features of the Site.

## 2. Use of Personal Data Collected

PROBA may use personally identifiable information in a number of ways, including but not limited to:

(a) To communicate with You about Your account, or to communicate information about the Site.

(b) To build higher-quality, more useful services, such as by analyzing usage trends, and by measuring demographics and interests regarding specific areas of the Site.

(c) To support the operation of the Site, troubleshoot problems, resolve disputes, and to enforce our Terms and Conditions.

(d) To inform You about products, activities, and services related to PROBA. You will have the option of opting out of further communications of this type by sending an email to: [weprobe4u@protonmail.com](mailto:weprobe4u@protonmail.com). (Please refer to Section 7 below.)

(e) For any reason as provided in, and relevant to, Section 3 below.

### **3. Disclosure of Personal Data Collected**

PROBA may disclose personally identifiable information about You to Third Parties as follows:

(a) With Your consent.

(b) To facilitate a transaction or communication with a third party that You have initiated.

(c) To PROBA's agents and advisors (such as our attorneys). We only disclose the personal information necessary for them to provide their services to You or to us, and only under strict confidentiality restrictions.

(d) As PROBA reasonably believes necessary to: (1) comply with a law (including court and government orders, and civil subpoenas), regulation, legal process, or governmental request when PROBA has a good faith belief that the law requires it to do so; (2) enforce or apply PROBA's Terms and Conditions and other agreements; or (3) protect the rights, property, integrity, or safety of PROBA (and its affiliates, members, officers, employees, interns, and agents), Users, or other persons.

(e) If You partake (or we reasonably suspect that You are partaking) in any illegal or potentially illegal activity. We may disclose personal information even without a subpoena, warrant, or other court order, to the extent we feel is necessary to inform and cooperate with law enforcement agencies or other appropriate authorities.

(f) To address fraud, security, or technical issues.

(g) In aggregated form, i.e., information about multiple Users collectively without identifying any individual User, such as the total number of Visitors to a particular section in a given week.

(h) If You provide us with Your email address and/or postal address, PROBA may sell and/or rent lists containing email and/or postal addresses to third parties whose professional missions closely resemble those of PROBA. PROBA is careful in its decision to sell and/or rent lists. If You would like us to stop including your email or postal address in such lists, please send an email to the email address below, requesting that we remove Your information from these lists. If we receive such a request from You, we will act as promptly as possible to remove Your information from future lists that we sell or rent to third parties.

(i) However, nothing in this Privacy Policy is intended to limit any legal defenses or objections that You may have to a third party's, including a government's, request to disclose Your personal data.

### **4. Collection of Personal Data from Children**

To the extent that PROBA is able to determine the age of Users by their submissions to, or communications with, the Site, PROBA will not knowingly (a) collect or post information from individuals under thirteen (13) years of age (“Children” or “Child”) without their parent’s or guardian’s consent, or (b) provide any personally identifying information collected from Children, regardless of its source, to any third party for any purpose whatsoever.

## **5. Security Measures**

PROBA has implemented numerous security features to prevent the unauthorized release of or access to personal information. In particular, when a Visitor provides information through the Site, PROBA may offer the Visitor the ability to use a secure server. The secure server encrypts all information a Visitor inputs before it is sent to PROBA, and is also used to store personal information securely.

## **6. Third Party Web Sites**

The Site may contain links to other Internet web sites. Unless we explicitly state otherwise, we have no control over these third-party sites and their privacy practices, and this Privacy Policy applies only to information You supply (or that we collect) in connection with use of the Site. You should review third-party privacy policies in connection with visiting their sites. Please be aware that there may be other services that You are using and that are not controlled by PROBA (including, but not limited to, Google, Google Chrome Web Browser, Android Operating System, and YouTube) that may continue to send information to third party service providers when You use the Site, even if You have asked us not to send information through our services.

## **7. Opt-Out Right**

Visitors may opt-out of having their personal information collected or used by PROBA, by contacting PROBA via email at the email address as listed below (see Section 11).

## **8. PROBA’s Right to Contact Visitor**

PROBA reserves the right to contact Visitors to the Site at its discretion.

## **9. Access to and Ability to Correct Personal Data**

PROBA may sell and/or rent lists containing email and/or postal addresses to third parties whose professional missions closely resemble those of PROBA. PROBA takes extreme care in its decision to sell and/or rent. Upon request via email (during regular business hours), PROBA may provide to Visitors a summary of any personally identifiable information retained by PROBA regarding the Visitor and, to the extent reasonably possible, the identity of third parties who have been provided personal information within the last year. Visitors may modify, correct, change, or update personally identifiable information that PROBA has collected through the Site or may cause their personal record to be removed from PROBA’s database, if any, by contacting PROBA via email indicated below (see Section 11). Keep in mind that search engines and other third parties

may still retain copies of Your personal information even after You have deleted the information from PROBA's database.

## **10. PROBA's Right to Change Privacy Policy**

PROBA may change the content of our Site and Privacy Policy at any time. Please revisit our Privacy Policy from time to time to be sure You are familiar with our current policy.

## **11. Contact Information**

If You have any questions regarding this Privacy Policy or You would like to review, change, and/or remove Your personal information, You may contact us at: [weprobe4u@protonmail.com](mailto:weprobe4u@protonmail.com). If you email us, we will keep the content of Your message, Your email address, and Your contact information to respond to Your request.

## **12. No Rights or Benefits**

This Privacy Policy is not intended to, and does not, create any right, benefit, trust, or responsibility, substantive or procedural, enforceable at law or in equity by any party against PROBA, its parent, subsidiaries, and affiliates, or its respective agents, members, associates, officers, directors, employees, interns, representatives, or any other person.

## **13. Governing Law**

Unless otherwise expressly provide by PROBA, this Privacy Policy and the privacy practices of PROBA will be subject exclusively to the internal laws of the State of Delaware (irrespective of its choice of law principles) within the United States of America. PROBA makes no representation that this Privacy Policy and such practices comply with the laws of any other country.

## **14. For Users Outside of the United States**

Visitors who use the Site and reside outside the United States do so on their own initiative and are responsible for compliance with local laws, if and to the extent local laws are applicable. Visitors, by using the Site, acknowledge and agree that PROBA's servers and operations are in the United States. As a result, regardless of where You live, Your content is transferred to and stored in the United States, and You hereby consent to the transfer, processing, and storage of Your content in the United States. If You reside outside of the United States, by using the Site, You consent to the transfer and use of Your information outside your country.