

# EU GDPR – Data Protection Policy

July 26, 2024

## Preamble

Crossvale, Inc. (Crossvale) values its users' privacy. This Privacy Policy ("Policy") will help you understand how we collect and use personal information from those who visit our website or make use of our online facilities and services, and what we will and will not do with the information we collect. Our Policy has been designed and created to ensure those affiliated with Crossvale, Inc. of our commitment and realization of our obligation not only to meet, but to exceed, most existing privacy standards.

We reserve the right to make changes to this Policy at any given time. If you want to make sure that you are up to date with the latest changes, we advise you to frequently visit this page. If at any point in time Crossvale, Inc. decides to make use of any personally identifiable information on file, in a manner vastly different from that which was stated when this information was initially collected, the user or users shall be promptly notified by email. Users at that time shall have the option as to whether to permit the use of their information in this separate manner.

This Policy applies to Crossvale, Inc., and it governs any and all data collection and usage by us. Through the use of www.crossvale.com, you are therefore consenting to the data collection procedures expressed in this Policy.

## Security Policy and Responsibilities in the Company

- For a company, in addition to existing corporate objectives, the highest data protection goals are to be defined and documented. Data protection goals are based on data protection principles and must be individually modified for every company.
- Determination of roles and responsibilities (e.g., representatives of the company, operational data protection officers, coordinators or data protection team and operational managers).
- Commitment to continuous improvement of a data protection management system.
- Training, sensitisation, and obligation of the employees.

## Legal Framework in the Company

- Industry-specific legal or conduct regulations for handling personal data.
- Requirements of internal and external parties.
- Applicable laws, possibly with special local regulations.

## Documentation

- Conducted internal and external inspections.
- Data protection need; determination of protection need with regard to confidentiality, integrity and availability.

## Existing Technical and Organisational Measures (TOM)

Appropriate technical and organisational measures that must be implemented and substantiated, taking into account, inter alia, the purpose of the processing, the state of the technology, and the implementation costs.

The description of the implemented TOM can, for example, be based on Art. 32 GDPR:

- Pseudonymisation (Art. 32 (1) (a) of the GDPR; Art. 25 (1) of the GDPR)
- Encryption (Art. 32 (1) (a) of the GDPR)
- Confidentiality (Art. 32 (1) (b) of the GDPR)
  - Access Control
  - Entry Control
  - Authorisation Control
  - Separation Control
- Integrity (Art. 32 (1) (b) of the GDPR)
  - Transfer Control
  - Input Control
- Availability and Resilience (Art. 32 (1) (b) of the GDPR)
  - Availability Control
  - Resilience Control
- Recoverability (Art. 32 (1) (c) of the GDPR)
- Procedures for Regular Review, Assessment and Evaluation (Art. 32 (1) (d) of the GDPR; Art. 25 (1) of the GDPR)
  - Data-Protection-Management-System
  - Incident-Response-Management-System
  - Data Protection by Design and Default
  - Order Control

## Information We Collect

It is always up to you whether to disclose personally identifiable information to us, although if you elect not to do so, we reserve the right not to register you as a user or provide you with any products or services. This website collects various types of information, such as:

- Voluntarily provided information which may include your name, address, email address, billing and/or credit card information etc. which may be used when you purchase products and/or services and to deliver the services you have requested.
- Information automatically collected when visiting our website, which may include cookies, third party tracking technologies and server logs.

In addition, Crossvale, Inc. may have the occasion to collect non-personal anonymous demographic information, such as age, gender, household income, political affiliation, race and religion, as well as the type of browser you are using, IP address, or type of operating system, which will assist us in providing and maintaining superior quality service.

## Why We Collect Information and For How Long

We are collecting your data for several reasons:

- To better understand your needs and provide you with the services you have requested;
- To fulfill our legitimate interest in improving our services and products;
- To send you promotional emails containing information we think you may like when we have your consent to do so;
- To contact you to fill out surveys or participate in other types of market research, when we have your consent to do so;
- To customize our website according to your online behavior and personal preferences.

The data we collect from you will be stored for no longer than necessary. The length of time we retain said information will be determined based upon the following criteria: the length of time your personal information remains relevant; the length of time it is reasonable to keep records to demonstrate that we have fulfilled our duties and obligations; any limitation periods within which claims might be made; any retention periods prescribed by law or recommended by regulators, professional bodies or associations; the type of contract we have with you, the existence of your consent, and our legitimate interest in keeping such information as stated in this Policy.

## Use of Information Collected

Crossvale, Inc. does not now, nor will it in the future, sell, rent or lease any of its customer lists and/or names to any third parties.

Crossvale, Inc. may collect and may make use of personal information to assist in the operation of our website and to ensure delivery of the services you need and request. At times, we may find it necessary to use personally identifiable information as a means to keep you informed of other possible products and/or services that may be available to you from [www.crossvale.com](http://www.crossvale.com)

Crossvale, Inc. may also be in contact with you with regards to completing surveys and/or research questionnaires related to your opinion of current or potential future services that may be offered.

Crossvale, Inc. uses various third-party social media features including but not limited to Facebook, Twitter, LinkedIn and other interactive programs. These may collect your IP address and require cookies to work properly. These services are governed by the privacy policies of the providers and are not within Crossvale, Inc.'s control.

## Disclosure of Information

Crossvale, Inc. may not use or disclose the information provided by you except under the following circumstances:

- As necessary to provide services or products you have ordered;
- In other ways described in this Policy or to which you have otherwise consented;
- In the aggregate with other information in such a way so that your identity cannot reasonably be determined;
- As required by law, or in response to a subpoena or search warrant;
- To outside auditors who have agreed to keep the information confidential;
- As necessary to enforce the Terms of Service;
- As necessary to maintain, safeguard and preserve all the rights and property of Crossvale, Inc.

## Non-Marketing Purposes

Crossvale, Inc. greatly respects your privacy. We do maintain and reserve the right to contact you if needed for non-marketing purposes (such as bug alerts, security breaches, account issues, and/or changes in Crossvale, Inc. products and services). In certain circumstances, we may use our website, newspapers, or other public means to post a notice.

## Children under the Age of 13

Crossvale, Inc.'s website is not directed to, and does not knowingly collect personal identifiable information from, children under the age of thirteen (13). If it is determined that a child under the age of thirteen has provided us with personal information, we will delete such information as quickly as possible.

## Cookies and Tracking Technology

Cookies and tracking technology are used to enhance the functionality of our website. Cookies are small data files placed on your device that help us remember your preferences and improve your experience.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can modify your browser settings to decline cookies if you prefer.

Crossvale, Inc.  
6316 Frisco Square Blvd, Suite 400,

Frisco, Texas 75034

+1 214 572 5352

www.crossvale.com

## Security

Crossvale, Inc. takes reasonable and appropriate precautions to maintain the security of your personal information. We have implemented various physical, managerial, and technical safeguards to protect your information from unauthorized access, use, or disclosure.

## Legal Rights and Requests

Under GDPR, you have the right to access, correct, delete, or restrict the processing of your personal data. You can also object to processing and request data portability. To exercise these rights, please contact us at the address provided below. We will respond to your request in accordance with applicable laws and regulations.

## Contact Information

If you have any questions or concerns about this Policy, or if you wish to exercise your rights under GDPR, please contact us at:

- Email: [privacy@crossvale.com](mailto:privacy@crossvale.com)
- Telephone number: +1 214 572 5352

Crossvale, Inc. HQ	Crossvale EMEA	Crossvale Spain
6136 Frisco Square Blvd, Suite 400 Frisco, Texas 75034-3251 USA	The Technology Centre, Queens Rd. Belfast BT3 9DT Northern Ireland	Calle Sant Ferrán, 9 Alginet, Valencia, 46230 Spain

The data controller responsible for your personal information for the purposes of GDPR compliance is:

Jose Alonso:  
[jalonso@crossvale.com](mailto:jalonso@crossvale.com)  
+1 214 572 5352  
6136 Frisco Square Blvd, Suite 400  
Frisco, Texas 7534-3251  
USA