

## **WEBSITE PRIVACY POLICY (US)**

The Internet is an amazing tool. It has the power to change the way we live, and we're starting to see that potential today. With only a few mouse-clicks, you can follow the news, look up facts, buy goods and services, and communicate with others from around the world. It's important to Treu LLC to help our customers retain their privacy when they take advantage of all the Internet has to offer.

Your privacy is important to you and to us. So we'll protect the information you share with us. To protect your privacy, Treu, LLC. follows different principles in accordance with worldwide practices for customer privacy and data protection.

- We won't sell or give away your name, mail address, phone number, email address or any other information to anyone.
- We use state-of-the-art security measures to protect your information from unauthorized users.

### **NOTICE**

We will ask you when we need information that personally identifies you (personal information) or allows us to contact you. Generally, this information is requested when you create a Registration ID on the site or when you download free software, enter a contest, order email newsletters or join a limited-access premium site. We use your Personal Information for four primary purposes:

- To make the site easier for you to use by not having to enter information more than once.
- To help you quickly find software, services or information.
- To help us create content most relevant to you.
- To alert you to product upgrades, special offers, updated information and other new services from Treu, LLC..

### **CONSENT**

If you choose not to register or provide personal information, you can still use most of [www.treu.com](http://www.treu.com). But you will not be able to access areas that require registration.

If you decide to register, you will be able to select the kinds of information you want to receive from us by subscribing to various services, like our electronic newsletters. If you do not want us to communicate with you about other offers regarding Treu, LLC. products, programs, events, or services by email, postal mail, or telephone, you may select the option stating that you do not wish to receive marketing messages from Treu, LLC.

### **SECURITY**

Treu, LLC. has taken strong measures to protect the security of your personal information and to ensure that your choices for its intended use are honored. We take strong precautions to protect your data from loss, misuse, unauthorized access or disclosure, alteration, or destruction.

We guarantee your e-commerce transactions to be 100% safe and secure. When you place orders or access your personal account information, you're utilizing secure server software SSL, which encrypts your personal information before it's sent over the Internet. SSL is one of the safest encryption technologies available.

In addition, your transactions are guaranteed under the Fair Credit Billing Act. This Act states that your bank cannot hold you liable for more than \$50.00 in fraudulent credit card charges. If your bank does hold you liable for \$50.00 or less, we'll cover your liability provided the unauthorized, fraudulent use of your credit card resulted through no fault of your own and from purchases made from us over our secure server. In the event of unauthorized use of your credit card, you must notify your credit card provider in accordance with its reporting rules and procedures.

Treu, LLC. strictly protects the security of your personal information and honors your choices for its intended use. We carefully protect your data from loss, misuse, unauthorized access or disclosure, alteration, or destruction.

Your personal information is never shared outside the company without your permission, except under conditions explained above. Inside the company, data is stored in password-controlled servers with limited access. Your information may be stored and processed in United States or any other country where Treu, LLC., its subsidiaries, affiliates or agents are located.

You also have a significant role in protecting your information. No one can see or edit your personal information without knowing your username and password, so do not share these with others.

## **ENFORCEMENT**

If for some reason you believe Treu, LLC. has not adhered to these principles, please notify us by email at [info@Treu.com](mailto:info@Treu.com), and we will do our best to determine and correct the problem promptly. Be certain the words Privacy Policy are in the Subject line.

## **ELECTRONIC PRODUCT REGISTRATION**

When you buy and install a new product, we may ask you to register your purchase electronically. When you do, we merge your registration information with any information you've already left with us (we call that information your personal profile). If you haven't previously registered with us, we create a personal profile for you from your product registration information. If you ever want to review or update that information, you can visit the Profile Center, click on Update Profile, and edit any of the Personal Information in your profile. If you haven't already created a Registration ID, we will ask you to do so. This ensures that only you can access your information.

## **WHAT WE DO WITH THE INFORMATION YOU SHARE**

When you join us, you provide us with your contact information, including Melanie Plitt and email address. We use this information to send you updates about your order, questionnaires to measure your

satisfaction with our service and announcements about new and exciting services that we offer. When you order from us, we ask for your credit card number and billing address. We use this information only to bill you for the product(s) you order at that time. For your convenience, we do save billing information in case you want to order from us again, but we don't use this information again without your permission. We occasionally hire other companies to provide limited services on our behalf, including packaging, mailing and delivering purchases, answering customer questions about products or services, sending postal mail and processing event registration. We will only provide those companies the information they need to deliver the service, and they are prohibited from using that information for any other purpose. Treu, LLC. will disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on Treu, LLC. or the site; (b) protect and defend the rights or property of Treu, LLC. and its family of Websites, and, (c) act in urgent circumstances to protect the personal safety of users of Treu, LLC., its Websites, or the public.

## **WEBSITE PRIVACY POLICY (EU)**

### **Privacy statement according to GDPR**

The entity responsible within the framework of the General Data Protection Regulation (GDPR) and other national data protection laws and data protection regulations is:

**Treu, LLC.**

6751 Columbia Gateway Dr. #300  
Columbia, MD 21046

**Phone:** +1 (443) 562-1984

**E-Mail:** [info@Treu.com](mailto:info@Treu.com)

**Website:** [www.Treu.com](http://www.Treu.com)

We will inform you below about the processing of your personal data in the context of the use of our website.

If you have any questions about privacy in connection with our website or the services offered, please contact us at: [info@Treu.com](mailto:info@Treu.com).

#### **2. Scope, purpose and legal basis for the processing of personal data**

We collect and use personal data of our users only to the extent necessary for the provision of a functional website as well as our content and services. The collection and use of personal data of our users takes place regularly only with the consent of the user. An exception applies to cases in which prior consent cannot be obtained and the processing of the data is permitted by law.

##### **2.1 Creation of log files**

Every time our website is accessed, our system automatically collects data and information from the computer system of the calling computer.

The following data ("technical information") are collected here:

- Information about the browser type and version used
- The IP address of the user
- Date and time of access
- Websites from which the system of the user comes to our website

The data is also stored in the log files of our system. A storage of this data together with other personal data of the user does not take place.

In doing so, we process this technical information for network security purposes, e.g. to combat attacks, for marketing purposes, to better understand the needs of our users and to improve our website offerings.

This explains our legitimate interest in the processing of data according to Art. 6 para. 1 lit. f GDPR. The collection of data for the provision of the website and the storage of the data in log files is essential for the operation of the website. There is consequently no objection possibility by the user.

## 2.2 Use of cookies

Our website uses cookies. Cookies are text files that are stored in the Internet browser respectively by the Internet browser of the user's computer system. When a user visits a website, a cookie may be stored on the user's operating system. This cookie contains a characteristic string that allows the browser to be uniquely identified when the website is reopened.

We use cookies to make our website more user-friendly. Some elements of our website require that the calling browser be identified even after a page break. The user data collected through technically necessary cookies will not be used to create user profiles.

The use of the analysis cookies is for improving the quality of our website and its contents. Through the analysis, we learn how the website is used and so we can constantly optimize our offer. This explains our legitimate interest in the processing of data according to Art. 6 para. 1 lit. f of GDPR. Cookies are stored on the computer of the user and are transmitted by this on our side. Therefore, as a user, you have full control over the use of cookies.

By changing the settings in your internet browser, you can disable or restrict the transmission of cookies. Already saved cookies can be deleted at any time. This can also be done automatically. If cookies are disabled for our website, it may not be possible to use all the functions of the website.

## 2.3 Contact form

On our website is a contact form available, which can be used to get in touch. The data entered in the input mask will be transmitted and stored. This data is:

- First name
- Last Name
- E-mail address
- Phone number

At the time of sending the message, the following data will also be stored:

- The IP address of the user
- Date and time of registration

Before processing the data in the contact form consent is obtained and it is referred to this privacy statement. Alternatively, contact via the provided e-mail address is possible. In this case, the user's personal data transmitted by e-mail will be stored. In this context, there is no disclosure of the data to third parties. The data is used exclusively for processing the conversation. Additional personal data processed during the sending process serve to prevent misuse of the contact form and to ensure the security of our information technology systems.

Legal basis for processing of the data is Art. 6 para. 1 lit. a GDPR.

The legal basis for the processing of the data transmitted during sending an email is Article 6 (1) lit. f GDPR.

If the e-mail contact aims to conclude a contract, then additional legal basis for the processing is Art. 6 para. 1 lit. b GDPR. The data will be deleted as soon as they are no longer necessary for its collection. For the personal data from the contact form and those sent by email, this is the case when the respective conversation with the user has ended. The conversation is ended when it can be inferred from the circumstances that the relevant facts have been finally clarified. The user has the opportunity at any time to revoke his/her consent to the processing of personal data with immediate effect. If the user contacts us by email, he/she may object to the storage of his personal data at any time. In such a case, the conversation cannot continue. All personal data stored will be deleted in this case.

## 2.4 Tracking Tools

On our website we use Google Analytics:

The purpose is to increase the efficiency of our website and direct marketing. These tools are operated by third parties and require the transfer of data via the website visitors. The legal basis for the use of the website analysis is Art. 6 para. 1 lit. f GDPR.

## 3. Legal principle for the processing of personal data

If we obtain consent from the data subject for personal data processing operations, article 6 (1) lit. a EU General Data Protection Regulation (GDPR) serves as the legal principle for the processing of personal data.

In the case of the processing of personal data that is required for the performance of a contract to which the data subject is a contractual party, article 6 (1) lit. b GDPR serves as the legal principle. This also applies for processing operations that are required for the implementation of precontractual measures.

If a processing of personal data is required for the fulfilment of a legal obligation, to which our company is subject, article 6 (1) lit. c GDPR serves as the legal principle. In case the vital interests of the data subject or another natural person make it necessary to process personal data, article 6 (1) lit. d GDPR serves as the legal principle.

If the processing is required for the protection of our company's or a third party's legitimate interest and the data subject's interests, basic rights and basic freedoms do not outweigh the first-named interest, article 6 (1) lit. f GDPR serves as the legal principle for the processing.

In this case, besides the above-mentioned purposes, our legitimate interests are:

- Protection of the company against material or non-material damage
- The professionalisation of our products and services
- Cost optimization

Furthermore, we process personal data in order to meet retention obligations under commercial law or tax law. For legally prescribed or contractual requirements, we have identified the respective input fields in the input masks on our website, which must imperatively be filled by you so that we can provide the service requested by you.

#### 4. Data deletion and storage period

The data subject's personal data will be deleted or blocked as soon as the purpose of the storage ceases to apply or is no longer required. In that regard, it may occur that personal data is retained for the time in which claims are asserted against our company (statutory limitation periods of up to thirty years may exist). A storage for a longer time period may occur if this has been provided for or prescribed by the European or national legislator in EU regulations, laws or other provisions to which the controller is subject.

Corresponding documentary evidence and retention obligations result among other things from the Commercial Code [Handelsgesetzbuch], the Tax Code [Abgabenordnung] and the Money Laundering Act [Geldwäschegesetz]. The storage periods accordingly are up to ten years. A blocking or deletion of the data will also be done if a storage period prescribed by the indicated standards expires, unless a necessity of the further storage of the data for the conclusion of a contract or the performance of a contract exists.

#### 5. Disclosure of personal data to third parties

Furthermore, we are in some cases legally obliged to provide personal data to German and international authorities. The legal basis for this is Art. 6 para. 1 lit. c GDPR in conjunction with local and international regulations and agreements.

#### 6. Right to object under article 21 GDPR

You have the right to file an objection at any time for reasons arising from your personal situation, to the processing of the personal data concerning you under article 6 (1) lit. e or f GDPR; this also applies to profiling based on these provisions. The data controller no longer processes the personal data concerning you, unless he can furnish documentary evidence of compelling reasons worthy of protection for the protection, which outweigh your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims. If the personal data concerning you is processed for direct marketing purposes, you have the right to object at any time to the processing of the personal data concerning you for the purpose of such advertising; this also applies to profiling, insofar as it is associated with such direct marketing. If you object to the processing for direct marketing purposes, the personal data concerning you

will no longer be processed for these purposes. You have the possibility to exercise your right of objection in connection with the use of information society services by means of automated procedures using technical specifications, notwithstanding Directive 2002/58/EC.

#### 7. Data subject's rights

For our company it is an important concern to structure our processes transparently for the processing of personal data. Therefore, we point out that besides the right to object you have further rights provided that the respective statutory requirements are met: Right to information under article 15 GDPR Right to rectification under article 16 GDPR Right to deletion ("right to be forgotten") under article 17 GDPR Right to restriction of processing under article 18 GDPR Right to notification under article 19 GDPR Right to data portability under article 20 GDPR (No) automated decision in a particular case including profiling under article 21 GDPR

To protect your rights, you can contact us by e-mail at: **info@Treu.com** To be able to process your application as well as for identification purposes, we point out that we process your personal data under article 6 (1) lit. c GDPR.

#### 8. Consent

You have the right to revoke your declaration of consent under data protection law at any time with effect for the future. The revocation of the consent will not affect the lawfulness that processing carried out up until the revocation based on the consent. In some cases, despite the revocation, we are entitled to continue to process your personal data based on another legal principle (for the performance of a contract).