

# DLUX TECH Website Privacy Policy

Last updated: October 25, 2022

This Privacy Policy explains how DLUX TECH (“we”, “us”) collects, uses, shares, and protects the personal information we collect about individuals (“you”, “yours”) when you use the websites we operate and the services we provide.

This Privacy Policy does not apply to our processing of the personal information of business customers who are subscribers to DLUX TECH’s Martech and AI Service, or end users who access the DLUX TECH Services through a third party which has an embedding agreement with DLUX TECH. We process those subscribers’ or OEM users’ information in our capacity as a service provider/processor. Our processing of that information is governed by our agreement with our business customers.

Please read this Privacy Policy before you submit any personal information to DLUX TECH and [contact us](#) if you have any questions. By providing personal information to us, you agree to the practices described in this Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not provide personal information to us.

## 1. Definitions

- A. **Services or Service** refers to the Sites as well as DLUX TECH’s application integration and automation platform, tools, documentation, educational systems, and related services.
- B. **Sites** include [www.dluxtech.com](http://www.dluxtech.com) and the other websites under the Dluxtech.com domain.
- C. **Users** include visitors who use or otherwise interact with the Sites.

## 2. Personal Information We Collect

We collect personal information about you when you provide information directly to us, when third parties such as our business partners or service providers provide us with personal information about you. The following subsections describe the types of data we collect:

### A. Contact and Related Information

We may collect contact information and related personal information, relating to website visitors from various sources, including offline marketing activities. You may voluntarily provide this information to us by submitting it. In some cases, we may collect information about you from other sources, including third parties from whom we purchase personal information and from publicly available information, such as information published on social media sites, to the extent permitted by applicable law, and we may combine that information with personal information provided by you. This personal information may include:

- Name
- Phone number
- Role/Title
- Company name
- Physical Address
- Additional/substitute email addresses
- Social media ids and profiles
- IP address
- Device id

- Browsing and/or search history

For example, we may collect this information when you:

- Provide contact information online, for example to download or subscribe to DLUX TECH content, register for a DLUX TECH event, attend a webinar or take a course.
- Visit a website and the information is supplied to us by a cookie or other tracking technology. A cookie is a small text file that collects and tracks certain technical information. See our [Cookie Policy](#) for a description of the information collected from cookies and related tracking technologies, and your rights and options with respect to these technologies.

#### **B. Form, Email and Chat Data**

You may voluntarily submit to us, and we will retain and process information from Web forms and other online communication systems including email and chat applications. This may include personal information, such as your name, job title, company name, address, phone number, email address.

The Sites offer publicly accessible blogs and community forums, to which you may submit content. If you elect to post in a public area of our Sites, any Personal Information or other content that you voluntarily disclose becomes available both to DLUX TECH and to the public.

#### **C. Usage Data**

DLUX TECH automatically collects and stores non-identifiable and aggregated data, statistics and metrics derived from Users' activities when they visit DLUX TECH's Sites. For example, we use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help us analyze how users use the Site and enhance your experience when you use the Site. For more information on how Google uses this information, click [here](#). Please review our [Cookie Policy](#) for more information about cookies and similar technologies.

DLUX TECH also maintains system log files which may include internet protocol addresses, browser, internet service provider, pages visited within DLUX TECH's Sites, referring/exit pages, search terms, operating system, date/time stamp, and clickstream data.

## **3. Use and Sharing of Personal Information**

#### **A. Usage by DLUX TECH**

DLUX TECH collects and maintains personal information to:

1. send you marketing information (depending on whether you have opted out of receiving such communications. For further information, please review section 5 ('Correcting, Updating or Deleting Your Information');
2. respond to inquiries you submit to us;
3. analyze usage of our Site for internal purposes, to improve our marketing and outreach to visitors and potential customers, and to improve the content and functionality of the Site;
4. comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities;
5. protect our intellectual property rights, your or others' privacy rights in connection with your use of our Sites, (including by making and defending legal claims);

6. audit our internal processes for compliance with legal requirements and internal policies;
7. and prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

If provided, DLUX TECH may use your cell phone number to call or text you in order to provide support to you.

#### **B. Third-Party Service Providers**

DLUX TECH shares personal information with its Affiliates and third-party service providers (such as learning management systems, support services, and hosting partners) to provide the necessary hardware, software, networking, storage, and other services we use to operate the Site and maintain a high-quality User experience.

DLUX TECH may store personal information in internal third-party marketing, customer relationship management ("CRM") programs and mail-management software to facilitate interactions with Users or potential customers and for DLUX TECH's sales and marketing purposes.

In all situations where DLUX TECH discloses personal information to third parties acting as service providers or "agents" acting on behalf of DLUX TECH, DLUX TECH requires the recipient to adequately protect personal information and treat it as confidential.

#### **C. Other Information Sharing**

In addition to the purposes described above, we disclose personal information to respond to subpoenas, court orders, on legal process, or to establish or exercise our legal rights or defend against legal claims. We may also share such personal information if we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or as otherwise required by law.

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, dissolution, sale of all or a portion of our assets, (collectively a "Transaction"), your personal information and other information may be shared in the diligence process with representatives or counterparties and others assisting with the Transaction and transferred to a successor or affiliate as part of that Transaction along with other assets.

Additionally, we may share information, including personal information with our Affiliates, which include DLUX TECH Pvt Ltd, India., and DLUX TECH CORP Pty. Ltd., and other Affiliates as updated from time to time for administrative, operational, support and marketing purposes.

## **4. Links to Other Websites**

The Sites contains links to websites and applications, including websites and applications operated by affiliates and other third parties. DLUX TECH does not determine and we are not responsible for the privacy practices or content of websites and applications owned or operated by third parties. Your browsing and interaction on any third-party website or service, including those that have a link on our Site, are subject to that third party's terms and conditions and policies. We encourage you to read the privacy statements and other terms and conditions of third-party websites linked to the Sites.

## 5. Correcting, Updating or Deleting Your Information

We have established internal policies for the deletion of data that customers provide to us or that we obtain from other sources as describe in Section 2A. We will also respond to requests to delete personal information that may be held within our systems, to the extent possible and with the limitation that some information may need to be retained for legal or archival purposes(see the “[Data Retention](#)” section of this Policy for details). Note that if you remove or request removal of information that you posted in a public area of the Service, copies may remain viewable in cached and archived pages of the Service, or if other Users have copied or saved that information. Therefore, in some cases, we may not be able to delete your personal information.

To request removal, deletion, correction or updates of your personal information, contact us at [privacy@dluxtech.com](mailto:privacy@dluxtech.com) .

Moreover, if you are a DLUX TECH User and would like to opt-out of marketing communications from DLUX TECH please contact us at [privacy@dluxtech.com](mailto:privacy@dluxtech.com) or follow the unsubscribe instructions included in the marketing emails. Users in the EU and some other jurisdictions have more specific and additional rights related to their personal information: see sections 10 and 11 for more details.

## 6. Data Retention

DLUX TECH will retain your personal information for a period of time consistent with the original purpose of collection (see the “[Use and Sharing of Personal Information](#)” section above) or as long as necessary to comply with our legal obligations, maintain accurate accounting, financial and other operational records, or to resolve disputes.

We determine the appropriate retention period for personal information on the basis of the amount, nature, and sensitivity of the personal information being processed, the potential risk of harm from unauthorized use or disclosure of the personal information, whether we can achieve the purposes of the processing through other means, and on the basis of applicable legal requirements (such as applicable statutes of limitation).

After expiry of the applicable retention periods, your personal information will be deleted.

## 7. Incident Management and data breach notification

If DLUX TECH becomes aware of and determines that an incident involving personal information qualifies as a breach of security leading to the misappropriation, accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal information that compromises the security, confidentiality or integrity of such personal information, DLUX TECH User within 48 hours.

## 8. International Transfers

DLUX TECH may host and process User data in specific, non-U.S. locations. Some personal information may be transferred to the U.S. or other locations and processed there, including chat messages, and e-mails you send to us. Please refer to Section 12 below for further information applicable to Users in the EEA and the UK.

## 9. Security Measures

We seek to protect personal information using appropriate technical and organizational measures based on the type of personal information and applicable processing activity, as detailed on our [Security page](#). However, no Internet or e-mail transmission is ever fully secure or error free. In particular, e-mail sent to us may not be secure. Therefore, you should take special care in deciding what information you send to us via e-mail or chat. You are responsible for the selection and use of any privacy settings or security capabilities within the Sites or where applicable, third-party applications.

## 10. Children's Personal Information

DLUX TECH does not knowingly collect any personal information from children under the age of 13. If you are under the age of 13, please do not submit any personal information through our Site. We encourage parents and legal guardians to monitor their children's internet usage and to help enforce our Policy by instructing their children never to provide personal information on our Site without their permission. If you have reason to believe that a child under the age of 13 has provided personal information to DLUX TECH through our Site, please contact us, and we will use commercially reasonable efforts to delete that information from our databases.

## 11. Notice to California Residents

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to ask us for a notice identifying the categories of personal information which we share with our affiliates and/or third parties for marketing purposes, and providing contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this notice, please submit a written request to: [privacy@DLUXTECH.com](mailto:privacy@DLUXTECH.com).

Moreover, we are required by the California Consumer Privacy Act of 2018 ("CCPA") to provide this CCPA Notice to California residents to explain how we collect, use and share their personal information, and the rights and choices we offer California residents regarding our handling of their personal information, which the CCPA currently defines as "information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household."

This CCPA Notice does not apply to individuals with whom DLUX TECH engages in the individuals' capacity as representatives of businesses that may provide services to DLUX TECH, or to which DLUX TECH may provide its Services.

1. **Personal Information Collection, Use, and Disclosure:** We describe the sources through which we collect personal information and the types of personal information collected in the "[Personal Information We Collect](#)" section in the Services Privacy Policy. We describe the purposes for which we use and share this information in the "[Use and Sharing of Personal Information](#)" section in the Privacy Policy.
2. **California Privacy Rights:** To the extent provided for by law and subject to applicable exceptions, California residents have the following privacy rights in relation to the personal information we collect:
  1. Right to request access to information about categories of personal information DLUX TECH has collected about you, specific pieces of personal information DLUX TECH has collected about you, categories of sources from which the personal information is

collected, business or commercial purpose for collecting personal information, and categories of third parties with whom the business shares personal information.

2. Right to request deletion of any personal information collected about you by us.
3. Right to opt-out of the sale of personal information. Please note that we do not sell personal information we collect from you, in accordance with the definition of sell in the CCPA and its supplemental regulations.
4. Right against discrimination because you exercised the rights available to you.
5. Right to protection against waiver of rights.

You can exercise the rights described above, by sending an email to [privacy@dluxtech.com](mailto:privacy@dluxtech.com). You may exercise these rights by yourself or via an authorized agent who meets the agency requirements of CCPA. Once you exercise your rights, you agree to receive communication from us seeking information from you in order to verify your identity as the consumer from whom we have collected the personal information and such other information as reasonably required to enable us to fulfill your request. We will not fulfill your request unless you have provided sufficient information for us to reasonably verify that you are the consumer from whom we collected the personal information, as well as sufficient details necessary to help us handle the request.

Note: The Sites do not respond to browser “Do Not Track” (DNT) signals and operates as described in this Privacy Policy whether or not a DNT signal is received. If we do so in the future, we will describe how we do so in this Privacy Policy.

## 12. Changes to the Privacy Policy

We may, in our sole discretion, modify or update this Policy from time to time. When we post changes to this Privacy Policy, we will also revise the “Last Updated” date appearing at the top of the Policy. Any changes to this Privacy Policy are effective immediately after we post them. If we make any material changes to this Policy, we will endeavor to notify you by email or by posting a prominent notice on the Sites prior to the change becoming effective. We encourage you to review this page periodically for the latest information on our privacy practices. Your continued use of the Site after the publication of any updated Privacy Policy shall constitute your agreement to be bound by such changes to this Policy. Your only remedy, if you do not accept the terms of this Policy, is to discontinue use of the Site.

## 13. Contact Us

If you have questions regarding this Policy or about DLUX TECH’s privacy practices, or to file any complaints, please send your inquiries to :

DLUX TECH CORP PTY LTD.

Attention: Privacy Team

Suite-18, Level 5, Nexus Building, 4 Columbia Court, Norwest. NSW 2153

Email address: [privacy@dluxtech.com](mailto:privacy@dluxtech.com)