

Privacy Policy

The owner of <https://sx.org> (the ‘Site’) and the software system that allows clients to browse the web by rerouting communications through other users’ gadgets is Intelequia Technologies SL, address: Av. Manuel Hermoso Rojas, 4, 38003 Santa Cruz de Tenerife, España, NIF/CIF B02667145 (“Company”, “we”, “our” and “us”). Since We appreciate your privacy, we have drawn up this Privacy Policy as a means of guiding you (“User”, “Client” or “you”) to make informed choices while using this System.

This Privacy Policy constitutes a binding legal agreement between you and us. You agree and acknowledge the terms of this Privacy Policy, as amended from time to time, and consent to the data collection, use and sharing of your private information for the preparation as set out in this Privacy Policy by accessing and using the system or providing data to us in other forms.

Unless otherwise provided, this Privacy Policy is subject to the definitions outlined in the Terms of Service, which can be found on the Site. Please consider the Terms of Service, which are incorporated herein by reference, as an addition to this Privacy Policy. The Terms of Service may be applicable to the Parties in all cases not specifically set forth in this Privacy Policy.

For all purposes of the Privacy Policy, “Personal Information” or “Personal Data” shall mean any data that the Client provides to the Company, the Company collects from the Client or the Company obtains from third parties that distinguishes or relates to a particular individual. Data that is referred to as “Identifiable Data” or “Individual Data” in appropriate data protection laws, rules or control documents such as CCPA and GDPR is additionally included in the definition of Personal Information.

1 PROVIDED AND PROCESSED PERSONAL DATA

The processing of Personal Information that the Client provides to the System and Personal Information that the Company otherwise receives in connection with the Service is the Company's responsibility.

The following information can be accumulated and utilized by us:

- **Non-Personal Information.** As part of security purposes, to enable us to provide the Service as well as to continually develop the Service, and to analyze and monitor utilization, we collect non-personal information regarding the ways in which you use the Service. Generally, this is non-identifiable and non-identifiable information that is generated as a result of client movement. This non-personal data may include such things as your browser type, the websites you visit, the time you stay on them, the dates and times you navigate to them, any non-permanent identifiers, session information collected through cookies and similar technologies.
- **Private Information.** This is the data that either distinguishes you or can identify you, and may be confidential or private. Your IP address, certain online identifiers (your full name and email address where you provided this to us after registering or communicating with us via the “Contact Us” variant), fee and tariff details (in the event you purchase any Pricing Plan), and any other data we may sometimes request which is fundamental to the organization of the services, are among the Personal Data we collect and store.
- **Personal Information from applications created by third parties.** Additionally, the Company may receive Personal Client Data through third party applications, such as payment processors that facilitate servicing of the System. This means that any information that a client sends to third party applications under this Privacy Policy can also be sent to the company where it may be processed and stored.

In the event we combine Non-Personal Information with Personal Information, we will consider the combined information as Private Information. This Privacy Policy, as outlined above, regulates and outlines the collection, processing and use of Private Information.

As a matter of avoiding any doubt, the activity of any Client while using Proxies is not recorded, implying that we are not aware of any web pages visited by Clients and any activity on such web pages.

1.1 Personal information and data given by the client

Following utilization of the website, you may provide personal information. The Client provides personalized information during registration, use of his/her account and use of the site's features. Such personalized information may include the following:

- Username of the third party account used for registration (Google, Facebook, etc.);
- Email address (as used for logging in);
- Password;
- Data on the Client's cryptocurrency wallet, which is used to debit the Commission and transfer the amounts due to the Client as a refund and/or under the Referral Programme;
- Transactions data.

Any further information that is disclosed and may be shared under the provisions of the third party account shall be governed by the arrangements of those third parties.

Usage of third party applications, such as payment processors, which may request personal data from you in order to provide services that enable clients to pay company charges:

- Your card or cryptocurrency wallet details.

Any further information deemed to be required in order to charge you ((this may include identification documents, including image in photo, copies of any other documents necessary for identification purposes, information deemed necessary to comply with third parties' legal obligations under applicable financial or anti-money laundering laws (if applicable in any jurisdiction))).

For the purpose of ensuring transparency, all matters relating to the exchange, processing, utilizing and storing of Personal Information provided by the Client to third parties shall be stipulated in the respective confidentiality agreements with these parties. Therefore, the Company shall have no obligation or responsibility for the actions of these third parties.

Contact Us: When you select the 'contact us' option, the following information may be requested and collected by us:

- Full name;
- Phone number;
- Further contact information;
- Any additional information that we require to fulfill your request.

Notice that the Company deliberately does not process particular categories of Personal Data (including any information about your health, race, religion, political views, etc.). The Company advises the Client to be careful in disclosing this data when using the System, on websites (forums, comments, etc.) and elsewhere on the Internet. Moreover, the Company neither collects nor intentionally permits the receipt of Personal Data from Clients under the age of 18. Should the Company discover that it has Personal Data relating to a Client under the age of 18, the Company shall immediately delete the Personal Data from the Company's records. Should the Client have reason to believe that the Company has Personal Data relating to a Client under the age of 18, which is not permitted, please contact the Company at the email address provided in Section 10 of this Privacy Policy.

2. LEGAL BASIS AND USE OF PERSONAL DATA

2.1 Personal data shall only be processed and stored in accordance with the applicable data protection legislation and on the basis of one or more of the following legal bases:

- **Contractual obligations:** Personal data shall be processed for the purpose of fulfilling the Company's obligations to maintain the System and to provide the relevant services arising out of the Terms of Service concluded between the Company and the Client, or to take the necessary steps to conclude a contract with the Client, if requested by the Client.
- **Legal commitment:** The Company has the right to process the Client's Personal Data as required by law, particularly for the purpose of assisting any authority to investigate as may be required by law, to detect and prevent fraud and any other illegal or prohibited activity, to comply with applicable financial or anti-money laundering laws (if applicable in any jurisdiction).
- **Legitimate interest:** The Company has a legitimate interest in using Client Personal Data to monitor, analyze and improve the System, the Site and their functionality.
- **Consent:** Upon accepting the Terms of Service, the Client expressly consents to the processing of Personal Data as set out in this Privacy Policy in the manner and for the purposes specified herein. Where the Client has provided consent to the processing of Personal Data, the Client may revoke such consent at any time. However, please notice that in certain circumstances, the Company may continue processing activities even if consent is revoked, if any of the other legal bases outlined above are applicable.

2.1 Use of personal data. The Company shall process the Client's Personal Data as the Company's purpose is to ensure that the Client is able to use the System. The Company shall endeavor to make the System efficient and convenient. The Client's Personal Data may be utilized by one or more of the following:

- to identify the Client so that the Client can log into the Account;
- to fulfill our obligations under the Terms of Service;
- to fulfill our recognizable proof necessities;
- to contact the Client regarding the System, including sending information, acknowledgements, invoices, technical notices, updates, security alerts, as well as support and administrative notices;
- to inform the Client of any modifications made to the System, the Terms of Service or other important matters relating to the use of the System
- to keep the Client safe from fraudulent, unauthorized or unlawful activities;
- for the purpose of statistical analysis;
- for conducting promotional and marketing activities;
- for conducting polls and surveys;
- for administering the Account and maintaining internal records;
- for liaising with the Client on other issues.

3. PERSONAL DATA TRANSMISSION

Personal Data can be transmitted to the following categories of Personal Data processors:

- Companies engaged in technical support of the System's operation, including server and hosting companies;
- Companies providing analytical services, promotional partners and other companies in order to improve the operation of the System;
- Payment processors;
- Government authorities or legal advisors in the event of suspected criminal or illegal conduct;
- Persons/companies engaged by the Company in a business transaction or negotiating a business transaction involving the sale or transfer of all or part of the Company's business or assets. Such transactions may include any mergers, financings, acquisitions, and bankruptcy transactions or proceedings;
- Auditors and other examining organizations;
- Other persons as necessary for the appropriate performance of services to the Client and/or as may be required by the Company pursuant to law or an order of an authority.

The Company may disclose the Client's data to the Company's counterparties (partners, affiliates, etc.)

located in other countries. The Client's Personal Data may be stored, transferred and otherwise processed in countries outside the Client's country of domicile, which are countries that are part of the EEA or that have been recognised as appropriate by the European Commission, as well as countries that have not been recognised as appropriate by the European Commission.

The Company shall protect Personal Data when it is transmitted to recipients outside the EEA and shall take all reasonable steps to ensure that Personal Data is processed securely in accordance with this Privacy Policy. Nevertheless, the Client acknowledges that he/she understands and agrees that these countries may have different laws providing a lower level of protection for Personal Data and that such Personal Data may become subject to disclosure laws and requirements in those countries, including disclosure to governmental authorities, regulatory agencies and individuals, as a result of a relevant governmental or regulatory request, court order or other similar process. In order to avoid any doubts, Client accepts this Privacy Policy and agrees that Personal Data may be transferred to a country that has not been recognised as adequate by the European Commission.

4. THIRD PARTIES AND THEIR PRIVACY POLICIES

The Company's website may include links to other third party applications that are not monitored or operated by the Company. Accordingly, the Company cannot be accountable for the protection and confidentiality of any information that the Client submits while visiting such third party applications, and their websites, platforms are not governed by this Privacy Policy.

5. SECURITY

For the purpose of avoiding unauthorized access or disclosure, the Company shall utilize efficient physical, electronic and managerial procedures to secure Personal Data. The Company shall make all reasonable endeavors to protect the Client's Personal Data, but cannot ensure the security of information transmitted to the Website. Nevertheless, once the Company has received the Client's Personal Data, the Company shall use strict security procedures and protections to prevent unauthorized access.

Neither can the Company ensure that loss, misuse, unauthorized acquisition or alteration of the Client's Personal Data will not happen. The Client acknowledges that during registration on the Website it is necessary to choose a password of sufficient length and complexity, not to disclose the login and password to third parties.

6. CLIENT'S RIGHTS

Considering the differences in data protection laws that may apply to the Client due to the Client's nationality, place of residence and other factors, generally data protection laws provide the data subject (the Client) with the following data protection rights, which also apply to this Privacy Policy and the Company's processing of Personal Data:

6.1 The right to know. The Client is entitled to request information about the scope of the Personal Data processed by the Company by giving written notice.

6.2 The right of section. The Client is entitled to receive one (1) copy of the Personal Data being processed without charge. The Company shall charge a fee for subsequent copies requested.

6.3 The right to rectification. The Client is entitled to have inaccurate Personal Data relating to that Client corrected by written request.

6.4 The right to deletion and limitation of processing. The Client is entitled to request deletion or restriction of processing, as well as the right to object to processing on the basis of legitimate interests in certain circumstances, unless the Company has contrary obligations under applicable law. In these cases, the Company may cease to allow use of the System if this is no longer possible, so please bear this in mind when deciding how to exercise these rights.

6.5 The right of portability. The Client is entitled to exercise the right to data portability, which means the right to receive Personal Data and transfer it to another controller.

6.6 Other Rights. The Client is entitled to other rights under this Privacy Policy and applicable law. The

Client acknowledges and confirms that if the legislation applicable to the Client does not guarantee the Client any of the rights listed above, the Company is not obliged to comply with such a request.

For the purpose of realizing the data processing rights outlined in the table above, the Client should send a request to the Company via the Company's support email listed in section 9 and follow the instructions received, or send such a request to the Company directly via the Client's Account settings (if any).

Notice that in certain circumstances, in order to comply with the request, the Company may ask the Client to provide the Company with certain further information if this is reasonably necessary to identify the Client (as set out in clause 1 of the Privacy Policy). The Company shall comply with the Client's request without any additional charge within one month from the date of its receipt, but in some cases this period may be extended for another two months. The Company is entitled to refuse to fulfill the Client's request or charge a reasonable fee if the Client's request is manifestly unreasonable or excessive.

7. DURATION OF PROCESSING PERSONAL DATA

The Company shall keep any Personal Data of the Client that the Company collects for as long as the Client's Account is active under the Terms of Service and/or for as long as it is reasonably necessary to provide the System to the Client and for as long as the Company has a lawful basis for processing the Personal Data. The Company also erases the Client's Personal Data once the purposes for which the Company collected such data have been fulfilled.

You acknowledge that the Company may continue to maintain some of the Client's Personal Data even after granting the Client's request to erase such Personal Data in the following cases:

- The Company shall have legitimate grounds for further processing of the Client's data other than the Client's consent. For example, the Company may be compelled to do so in order to comply with applicable law (e.g. for tax or accounting reasons, knowledge of its client, anti-money laundering or other legal requirements and obligations);
- The Client's Personal Data has been depersonalized in such a way that it cannot be used to personally identify the Client and therefore no longer constitutes personal identifiable data of the Client.

8. DIRECT MARKETING RIGHTS AND OPT-OUT OPPORTUNITIES

8.1 Insofar as the Company has the right to send direct marketing communications or emails to the Client (as set out in clause 2.2), the Client shall have the right to unsubscribe from each of such communications by exercising the Client's right to unsubscribe as set out below. The Client acknowledges that unsubscribing from receiving direct marketing communications from the Company shall not affect the Company's right to send the Client other communications, emails or otherwise contact the Client as permitted under this Privacy Policy.

8.2 Should the Client desire not to process Personal Data for certain purposes, the Client should send a request to the Company at the contact email address set out in section 9 of this Privacy Policy.

8.3 Notice the following:

- Failure to fulfill specific processing purposes may result in the inability to provide the Client with some (or even all) of the functionality of the System in part (or at all). The Company will use its best endeavors to minimize such limitations of the System.
- The possibility of refusal of processing applies only to the processing of the Client's Personal Data on the basis of the Client's consent (as specified in clause 2.1.), unless otherwise expressly provided for by applicable law. The Company reserves the right to process Personal Data on other lawful grounds, such as contractual obligations, legitimate interest or legal obligation, if possible under applicable law, even if the Client has declined such processing in accordance with the provisions of this Privacy Policy.

9. CONTACT INFORMATION

The client may contact the company at support@sx.org with any issues with respect to this security arrangement or the utilization of personal information.

10. CHANGES TO THIS PRIVACY POLICY

10.1 The Company is entitled to amend this Privacy Policy at any time. Should the Company make any changes, it will alter the date of the last update indicated below. The Client shall independently verify such changes. Any updates to this Privacy Policy shall be effective from the date of publication on the Website (date of the last update).

10.2 In the event of material amendments, the Company shall retain the right to update the Privacy Policy subject to an appropriate update notice and regardless of the Client's consent. If the Client disagrees with the revised version of the Privacy Policy, the Company shall be entitled to suspend the use of the System that requires processing of the Client's data by the Company.

Last update: 01/09/2024