



The Privacy Policy

Ivigrreen LLC (online store of electronic products)

01/18/2023

General Terms

This Privacy Policy explains what personal data is collected when you use the website located at: <https://ivigrreen.com> and its any sub-domains (the “**Website**”), the services and products provided through it (together with the Website, the “**Service**”), how such personal data will be processed.

BY USING THE SERVICE, YOU AGREE THAT (I) YOU HAVE READ, UNDERSTAND, AND AGREE TO THIS PRIVACY POLICY, AND (II) YOU ARE OVER 16 YEARS OF AGE (OR HAVE HAD YOUR PARENT OR GUARDIAN READ AND AGREE TO THIS PRIVACY POLICY FOR YOU). If you do not agree or are unable to make this promise, you must not use the Service. In such case, you must (a) contact us and request deletion of your data; and (b) leave the Website and not use it.

“**GDPR**” means the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

“**EEA**” includes all current member states of the European Union and the European Free Trade Association. For the purpose of this policy, EEA shall include the United Kingdom of Great Britain and Northern Ireland.

“**Process**”, in respect of personal data, includes collecting, storing, and disclosing to others.

TABLE OF CONTENTS

1. [CATEGORIES OF PERSONAL DATA WE COLLECT](#)
2. [OUR PURPOSE FOR PROCESSING PERSONAL DATA](#)
3. [LEGAL BASES OR PROCESSING PERSONAL DATA](#) (Applies only to EEA-based users)
4. [WITH WHOM WE SHARE YOUR PERSONAL DATA](#)
5. [HOW YOU CAN EXERCISE YOUR PRIVACY RIGHTS](#)
6. [AGE LIMITATION](#)
7. [INTERNATIONAL DATA TRANSFERS](#)
8. [CHANGES TO THIS PRIVACY POLICY](#)
9. [CALIFORNIA PRIVACY RIGHTS](#)
10. [DATA RETENTION](#)
11. [PERSONAL DATA CONTROLLER and CONTACT US](#)

1. CATEGORIES OF PERSONAL DATA WE COLLECT

We collect data you give us voluntarily (for example, email address). We also collect data automatically (for example, your IP address).

1.1. Data you give us

If you decide to make a purchase on the Website, we will ask you to provide an email address that will be used to send you the purchase information, or any details on your payment. This email also can be used to inform you about our products and promotion. You can opt out of any further contacts by using the unsubscribe option in any email from us.

1.2. Data we collect automatically:

We collect data about your referring app or URL (that is, the app or place on the Web where you were when you tapped/clicked on our ad).

We collect data from your mobile device. Examples of such data include language settings, IP address, time zone, type and model of a device, device settings, operating system, Internet service provider, mobile carrier, hardware ID, and Facebook ID.

We record how you interact with our Service. For example, we log what pages you have viewed, the features and content you interact with, how often you use the Website, how long you are on the Website and your purchases.

We collect your Apple Identifier for Advertising (“IDFA”), Identifier for Vendor (“IDFV”) or Google Advertising ID (“AAID”) (depending on the operating system of your device) when you access our Website from a mobile device. You can typically reset these numbers through the settings of your device’s operating system (but we do not control this).

When you make payments through the Service, you need to provide financial account data, such as your credit card number, to our third-party service providers. We do not collect or store full credit card number data, though we may receive credit card-related data, and data about the transaction, including date, time, amount of the transaction, and the type of payment method used.

A cookie is a small text file that is stored on a user's computer for record-keeping purposes. Cookies can be either session cookies or persistent cookies. A session cookie expires when you close your browser and is used to make it easier for you to navigate our Service. A persistent cookie remains on your hard drive for an extended period of time. We also use tracking pixels that set cookies to assist with delivering online advertising.

Cookies are used, in particular, to automatically recognize you the next time you visit our website. As a result, the information, which you have earlier entered in certain fields on the Website, may automatically appear the next time when you use our Service. Cookie data will be stored on your device, and most of the time only for a limited time period.

2. OUR PURPOSE FOR PROCESSING PERSONAL DATA

We process your personal data:

2.1. To provide our Service

This includes enabling you to use the Service in a seamless manner and preventing or addressing Service errors or technical issues. As a result of such processing, we will use your email, for example, for sending you the purchase.

To host personal data and enable our Service to operate and be distributed, we use Hetzner Online GmbH, which are hosting and backend services.

2.2. To provide you with customer support

We process your personal data to respond to your requests for technical support, Service information, or to any other communication you initiate. For this purpose, we may send you, for example, notifications or emails about, the performance of our Service, security, payment transactions, notices regarding our

Terms and Conditions of Use, or this Privacy Policy

2.3. To communicate with you regarding your use of our Service

We communicate with you by email. These may include, for example, emails with information about the Service. To opt out of receiving emails, you need to follow the instructions in the footer of the emails.

The services that we use for these purposes may collect data concerning the date and time when the message was viewed by our Service's users, as well as when they interacted with it, such as by tapping/clicking on links included in the message.

2.4. To research and analyze your use of the Service

This helps us to better understand our business, analyze our operations, maintain, improve, innovate, plan, design, and develop the Service and our new products. We also use such data for statistical analysis purposes, to test and improve our offers. This enables us to better understand what categories of users use our Services. As a consequence, we often decide how to improve the Service based on the results obtained from this processing.

To analyze how visitors use our Service and to measure the effectiveness of some ads we use **Google Analytics**, a web analysis program of Google. In order to provide us with analytics, Google Analytics places cookies on your device. On Google Analytics we get, in particular, aggregated information on the data you enter on our Website and users' interactions within the Website. Google allows you to influence the collection and processing of the information generated by Google, in particular, by installing a browser plug-in, available here. You can read more about how Google uses information here.

We use Google Tag Manager to manage tags on the Website for conversion tracking and Website analytics.

We use **Facebook Analytics**, which is a service provided by Facebook that allows us to use different analytical tools. On Facebook Analytics we get, in particular, aggregated demographics and insights on how many people visit our Website, how often users make purchases, and other interactions. Learn more about Facebook's approach to data from its Privacy Policy.

BigQuery, an analytical service provided by Google, allows us to analyze large and complex datasets about the App. We also use Firebase Analytics, which is an analytics service provided by Google. In order to understand Google's use of data, consult Google's partner policy, Firebase Privacy information, and Google's Privacy Policy.

2.5. To send you marketing communications

We process your personal data for our marketing campaigns. As a result, you will receive information about our products, such as, for example, special offers or new features and products available on the Website. We may show you advertisements on our Website, and send you emails for marketing purposes. If you do not want to receive marketing emails from us, you can unsubscribe by following the instructions in the footer of the marketing emails.

We use **Mailer Lite**, which is a marketing personalization and retention platform, to deliver tailored email messages to our users.

2.6. To personalize our ads

We and our partners use your personal data to tailor ads and possibly even show them to you at the relevant time. For example, if you visited our Website, you might see ads for our products in your Facebook feed.

How you can opt-out or influence personalized advertising.

iOS: On your iPhone or iPad, go to Settings > Privacy > Apple Advertising and deselect Personalized Ads.

Android: To opt out of ads on an Android device, go to Settings > Privacy > Ads and enable Opt out of Ads personalization. In addition, you can reset your advertising identifier in the same section (this also may help you to see less personalized ads). To learn even more about how to affect advertising choices on various devices, please look at the information available [here](#).

macOS: On your MacBook, you can disable personalized ads: go to System Preferences > Security & Privacy > Privacy, select Apple Advertising, and deselect Personalized Ads.

Windows: On your laptop running Windows 10, you shall select Start > Settings > Privacy and then turn off the setting for Let apps use advertising ID to make ads more interesting to you based on your app activity.

We value your right to influence the ads that you see, thus we are letting you know what service providers we use for this purpose and how some of them allow you to control your ad preferences.

We use **Facebook pixel** on the Website. Facebook pixel is a code placed on the Website collecting data that helps us track conversions from Facebook ads, build a targeted audience and remarket to people who have taken some action on the Website (for example, purchased the book).

We use **Facebook Ads Manager** together with **Facebook Custom Audience**, which allows us to choose audiences that will see our ads on Facebook or other Facebook products (for example, Instagram). Through Facebook Custom Audience we may create a list of users with certain sets of data, and choose users that have completed certain actions in the Service (for example, visited certain sections of the Website). As a result, we may ask Facebook to show some ads to a particular list of users. As a result, more of our ads may show up while you are using Facebook or other Facebook products (for example, Instagram). You may learn how to opt out of advertising provided to you through Facebook Custom Audience [here](#). Facebook also allows its users to influence the types of ads they see on Facebook. To find out how to control the ads you see on Facebook, please adjust your ad settings on Facebook.

Google Ads is an ad delivery service provided by Google that can deliver ads to users. In particular, Google allows us to tailor the ads in a way that they will appear, for example, only to users that have conducted certain actions with our Website (for example, show our ads to users who have made a purchase). Some other examples of events that may be used for tailoring ads include, in particular, visiting our Website. Google allows its users to opt out of Google's personalized ads and to prevent their

data from being used by Google Analytics.

2.7. To process your payments

To enable the purchase and to process your payments we use third-party services for payment processing — **Stripe** and **PayPal** payment processing providers. As a result of this processing, you will be able to make a payment, and we will be notified that the payment has been made.

We do not store or collect your payment card details. This information will be provided directly to our third-party payment processors.

2.8. To enforce our Terms and Conditions of Use and to prevent and combat fraud

We use personal data to enforce our agreements and contractual commitments, to detect, prevent, and combat fraud. As a result of such processing, we may share your information with others, including law enforcement agencies (in particular, if a dispute arises in connection with our Terms and Conditions of Use).

2.9. To comply with legal obligations

We may process, use, or share your data when the law requires it, in particular, if a law enforcement agency requests your data by available legal means.

3. LEGAL BASES OR PROCESSING PERSONAL DATA (Applies only to EEA-based users)

In this section, we are letting you know what legal basis we use for each particular purpose of processing. For more information on a particular purpose, please refer to Section 3. This section applies only to EEA-based users.

We process your personal data under the following legal bases:

- to perform our contract with you;

Under this legal basis we:

- Provide our Service (in accordance with our Terms and Conditions of Use)
- Customize your experience
- Provide you with customer support
- Communicate with you regarding your use of our Service
- Process your payments

- for our (or others) legitimate interests unless those interests are overridden by your interests or fundamental rights and freedoms that require protection of personal data;

We rely on legitimate interests:

- to communicate with you regarding your use of our Service

This includes, for example, sending you to email to notify you that we have released a new product. The legitimate interest we rely on for this purpose is our interest to encourage you to use our Service more often.

- to research and analyze your use of the Service

Our legitimate interest for this purpose is our interest in improving our Service so that we understand users' preferences and are able to provide you with a better experience (for example, to make the use of the Website easier and more enjoyable, or to introduce and test new features).

- to send you marketing communications

The legitimate interest we rely on for this processing is our interest to promote our Service, including new products and special offers, in a measured and appropriate way.

- to personalize our ads

The legitimate interest we rely on for this processing is our interest to promote our Service in a reasonably targeted way.

- to enforce our Terms and Conditions of Use and to prevent and combat fraud

Our legitimate interests for this purpose are enforcing our legal rights, preventing and addressing fraud and unauthorized use of the Service, and non-compliance with our Terms and Conditions of Use.

- to comply with legal obligations.

4. WITH WHOM WE SHARE YOUR PERSONAL DATA

We share information with third parties that help us operate, provide, improve, integrate, customize, support, and market our Service. We may share some sets of personal data, in particular, for purposes and with parties indicated in Section 2 of this Privacy Policy. The types of third parties we share information with include, in particular:

Service providers

We share personal data with third parties that we hire to provide services or perform business functions on our behalf, based on our instructions. We may share your personal information with the following types of service providers:

- cloud storage providers

- data analytics providers
- measurement partners
- marketing partners
- payment service providers

Law enforcement agencies and other public authorities

We may use and disclose personal data to enforce our Terms and Conditions of Use, to protect our rights, privacy, safety, or property, and/or that of our affiliates, you or others, and to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, or in other cases provided for by law.

5. HOW YOU CAN EXERCISE YOUR PRIVACY RIGHTS

To be in control of your personal data, you have the following rights:

Accessing / reviewing / updating / correcting your personal data. You may review, edit, or change the personal data that you had previously provided on the Website.

Deleting your personal data. You can request the erasure of your personal data as permitted by law.

When you request the deletion of your personal data, we will use reasonable efforts to honor your request. In some cases, we may be legally required to keep some data for a certain time; in such an event, we will fulfill your request after we have complied with our obligations.

Objecting to or restricting the use of your personal data. You can ask us to stop using all or some of your personal data or limit our use.

Additional information for EEA-based users:

If you are based in the EEA, you have the following rights in addition to the above:

The right to lodge a complaint with a supervisory authority. We would love for you to contact us directly, so we could address your concerns. Nevertheless, you have the right to lodge a complaint with a competent data protection supervisory authority, in particular in the EU Member State where you reside, work, or where the alleged infringement has taken place.

The right to data portability. If you wish to receive your personal data in a machine-readable format, you can send the respective requests to us as described below.

To exercise any of your privacy rights, please send a request to admin@ivigreen.com.

6. AGE LIMITATION

We do not knowingly process personal data from persons under 16 years of age. If you learn that anyone younger than 16 has provided us with personal data, please contact us.

7. INTERNATIONAL DATA TRANSFERS

We may transfer personal data to countries other than the country in which the data was originally collected in order to provide the Service. If these countries do not have the same data protection laws as the country in which you initially provided the information, we deploy special safeguards.

In particular, if we transfer personal data originating from the EEA to countries with no adequate level of data protection, we use one of the following legal bases: (i) Standard Contractual Clauses approved by the European Commission, or (ii) the European Commission adequacy decisions about certain countries.

8. CHANGES TO THIS PRIVACY POLICY

We may modify this Privacy Policy from time to time. If we decide to make material changes to this Privacy Policy, you will be notified by available means such as email and will have an opportunity to review the revised Privacy Policy. By continuing to access or use the Service after those changes become effective, you agree with the revised Privacy Policy.

9. CALIFORNIA PRIVACY RIGHTS

California's Shine the Light law gives California residents the right to ask companies once a year what personal information they share with third parties for those third parties direct marketing purposes. Learn more about what is considered to be personal information under the statute.

To obtain this information from us, please send an email message to store@get-headway.com, which includes "Request for California Privacy Information" in the subject line and your state of residence and email address in the body of your message. If you are a California resident, we will provide the requested information to you at your email address in response.

10. DATA RETENTION

We will store your personal data for as long as it is reasonably necessary for achieving the purposes set forth in this Privacy Policy (including providing the Service to you). We will also retain and use your personal data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

11. PERSONAL DATA CONTROLLER and CONTACT US

Your data controller Pavel Belyaev can be contacted via email admin@ivigreen.com

You may contact us at any time for details regarding this Privacy Policy and its previous versions. For any questions concerning your account or your personal data please contact us at hello@ivigreen.com