

## **PRIVACY POLICY**

**[Last Updated: May 24, 2026]**

### **1. INTRODUCTION & SCOPE OF THIS PRIVACY POLICY**

This privacy policy (“**Privacy Policy**”) governs Optival LTD (“**Company**”, “**we**”, “**our**”, or “**us**”) Personal Data (as defined below) collection and privacy practices.

This Privacy Policy applies to the websites and other digital assets that we own and operate (including landing pages and advertisements, collectively, the “websites”). Through the websites, we provide information about, and comparisons between, various goods and services offered by third parties, and may enable users to be redirected to third-party business partners' websites where such goods and services are offered (each, a “**Business Partner**” and a “**Business Partner Website**”) (collectively “**Services**”).

This Privacy Policy provides the information and disclosure regarding the types of Personal Data collected from users when accessing, browsing or otherwise interacting with our website and Services, and any content available therein and other digital assets we operate (such as landing pages, ads, etc.) (collectively “**websites**”), including interaction with, the purposes for which we collect and use such Personal Data, the third parties with whom we may share it (and the purposes of such sharing), and your rights and choices regarding your Personal Data.

This Privacy Policy forms an integral part of our [Terms of Use](#) (“**Terms**”). Capitalized terms used but not defined in this Privacy Policy have the meanings given to them in the Terms.

### **2. ADDITIONAL INFORMATION FOR SPECIFIC JURISDICTIONS**

This Privacy Policy further includes or incorporates specific information required under applicable data protection laws for residents of certain jurisdictions, among others:

- *If you are a located in the EEA or UK* - this Privacy Policy further details our lawful basis for processing Personal Data, information regarding cross border data transfer and your rights, as well as additional information we are required to disclose to you under the EU/UK General Data Protection Regulations (“**GDPR**”).
- *If you are a California resident* - please also review [Section 14.A](#) of this Privacy Policy - *Additional Notice to California Residents* - which serves as a “*Notice at Collection*” as required under the California Consumer Privacy Act of 2018 (“**CCPA**”) effective November 2020, and further details the categories of information collected and additional information regarding our privacy practices, including your rights under the CCPA and other California privacy laws.
- *If you are a resident of certain states in the US* - including Colorado, Connecticut, Virginia and Utah, please review [Section 14.B](#) of this Privacy Policy - *Additional Notice for U.S Residents* - for additional information about privacy rights for residents of these U.S jurisdictions.

You acknowledge that you are not under any statutory obligation to provide us with Personal Data. However, if you will not provide us with certain Personal Data, we will not be able to provide certain features of our Services. For example, we must obtain your email address if you contact us, in order to communicate with you and in addition, certain cookies on our website are essential for the website to work properly while others intended to either improve our Services or assist in our promotional efforts, can be opted out. All as explained under this Privacy Policy. If you object to the collection of Personal Data we must obtain for certain Service, you have the option not to use such feature or to avoid from accessing our websites.

You are not legally required to provide us with Personal Data; however, if you choose not to provide certain Personal Data, we may be unable to provide certain features of the Services (for example, we may need your email address to respond to an inquiry). By accessing or using the websites or Services, you acknowledge that you have read and understood this Privacy Policy and agree to our collection, use, and disclosure of Personal Data as described herein. If you do not agree, do not access or use the websites or Services.

### **3. POLICY AMENDMENTS**

We reserve the right to amend this Privacy Policy from time to time at our sole discretion. The most recent version will always be posted on the Website, with the update date reflected in the “**Last Updated**” heading. If changes are material, we will provide notice to you and, where required by applicable law, obtain your consent. Unless otherwise stated, any amendments to the current practices of Personal Data we hold will become effective within 7-days upon the display of the modified Policy. We recommend that you review this Privacy Policy periodically to stay informed about our current privacy practices.

### **4. DATA CONTROLLER & CONTACT INFORMATION**

Optival LTD is the *controller* (as such term is defined under the GDPR or equivalent term under applicable data protections laws). This means we determine the purpose of means of the Personal Data we collected through your use of the website and Services.

If you have any questions, concerns or complaints regarding this Privacy Policy, or if you wish to exercise your rights, please contact our privacy team at: [Legal@optival.com](mailto:Legal@optival.com).

#### **Data Protection Representative - For Data Subjects in the EU and UK:**

We value your privacy and your rights as a data subject and have therefore appointed Prighter Group with its local partners as our privacy representative and your point of contact for the following regions:

- European Union (EU)
- United Kingdom (UK)

Prighter gives you an easy way to exercise your privacy-related rights (e.g. requests to access or erase personal data). If you want to contact us via our representative, Prighter or make use of your data subject rights, please visit the following website:

<https://app.prighter.com/portal/17096695636>

### **5. THE INFORMATION WE COLLECT & PURPOSE OF COLLECTION**

***You can find here information regarding the types of Personal Data we collect, the purposes for which we process your Personal Data, as well as the definitions of “personal” and “non-personal” data and how such data is processed.***

**A. Types of Information Collected and the Meaning of Personal Data**

Under applicable data protection laws, “**Personal Data**” generally refers to information that identifies an individual or that could, with reasonable effort, identify an individual (for example, online identifiers such as an IP address or cookie identifier, as well as a name, email address, etc.). Personal Data may also include information related to your preferences and behavior (for example, inferences or profiles) where such information is associated with you or may be linked to you.

We may also collect “**Non-Personal Data**”, meaning information that does not identify a specific natural person and cannot reasonably be used to identify a specific natural person. This may include aggregated information regarding the use of the website and Services (for example, the number of users accessing our websites, click trends, territories, frequency, and time and date statistics), as well as technical information transmitted by your browser or device (for example, device type, browser type, and operating system). Such information is considered Non-Personal Data when collected on an aggregate basis or otherwise not combined with online identifiers or other information that can be used to identify an individual.

If we combine Personal Data with Non-Personal Data, we will treat the combined data as Personal Data.

**B. Source of Personal Data**

Depending on your interaction with our website and Services, we will collect certain information, as further detailed below. We may collect such information by one or more of the following means:

- (i) Automatic means and tracking technologies (such as cookies, pixels and tags - see the “**Cookies and Similar Technologies**” section of this Privacy Policy) implemented by us or by third parties, such as our service providers, Business Partners, and other third-party marketing partners whose services we use (see the table below and the “**Data Sharing - Categories of Recipients We Share Personal Data With**” section of this Privacy Policy). This may also include “tracking links” implemented by us within Business Partner content displayed on our websites, which enable us and our Business Partners to know that a user (based on a unique online identifier) was directed from our website to a Business Partner’s website (as explained in the table below);
- (ii) when you voluntarily provide us your information, for example, when you contact us or complete a quiz; and
- (iii) From our Business Partners, mainly where you engage with such Business Partners after being directed from our websites.

**C. Personal Data Sets; Purpose and Use**

The table below details the Personal Data sets collected, processing of Personal Data, the purpose, lawful basis, and processing operations:

DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS
<p><b><u>Online Identifiers</u></b></p> <p>When you access our website and interact with our Services, we collect online identifiers such as your IP address, user agent, and cookie ID. We may also assign a unique identifier (a random combination of letters and numbers) to each user who accesses our website. In addition, a unique identifier may be assigned when you interact with features that direct you to our Business Partner’s Websites through a tracking link (as explained in the “<b>Source of Personal Data</b>” paragraph above) (collectively, “<b>Online Identifiers</b>”).</p> <p><b><u>Location Data</u></b></p> <p>We may process your approximate location (for example, at the country level) derived from your IP address.</p> <p><b><u>Device Information</u></b></p> <p>We collect information transmitted from your device, such as the device type and model, device and application version, browser type, operating system, etc.</p> <p><b><u>Usage Data</u></b></p> <p>We collect information regarding your use of, and interactions with our website and Services. This may include the pages you access and the content you interact with (for example clicked on) as well as click stream data, access and interactions timestamp, session duration, etc. We may store this information together with Online Identifiers, in log files (collectively “<b>Usage Data</b>”).</p> <p><i>***Where the data types listed above – including Location Data, Device Information and Usage Data are associated with Online Identifiers, we treat them as Personal Data, however we may also collect and use such information on an aggregated statistical</i></p>	<p>These data sets are processed for the following purposes:</p> <ul style="list-style-type: none"> <li>• operating, maintaining and providing the functionality of our website and Services;</li> <li>• ensuring security, preventing fraud and abuse, debugging, and resolving technical issues;</li> <li>• analytics and measurement, including understanding how users interact with our website and Services and measuring the effectiveness of our content and advertising campaigns;</li> <li>• improving and developing our Services (for example, to detect the applicable language); and</li> <li>• marketing and advertising, including measuring marketing campaign performance and, where permitted by applicable law, conducting interest-based advertising and retargeting based on your visits to our website.</li> </ul> <p>We may also use your unique ID or other Online Identifiers to track traffic flow from our website to our Business Partner’s website through tracking links, to manage our business engagement effectively, analyze performance metrics, monitor business transactions, and track conversions.</p>	<p>We process these data sets through our or third-party cookies and tracking technologies (see the <b>Cookies and Similar Technologies</b> Section below).</p> <p>We use strictly necessary cookies to process these data sets for the proper operation of our website based on our legitimate interest.</p> <p>Further, we will use other cookies to process these data sets for marketing and analytics purposes subject to your consent, provided through the cookie preference settings. You may withdraw consent at any time by using the cookie settings on our website.</p>

<i>basis, in which case it will not be considered Personal Data.</i>		
<p><b><u>Business Partners' Engagement Data</u></b></p> <p>As explained above, when you click on a Business Partner's offer on our website and directed to the Business Partner Websites, a tracking link may assign you a unique identifier. We will retain such action (i.e., the fact you have clicked and were directed to the Business Partner's Website). In some cases, depending on our commercial arrangement with the relevant Business Partner, the Business Partner may share with us the information about your subsequent engagement with its offer. This may include, for example, whether you registered, made purchase, opened an account, and, where applicable, the amount paid or deposited.</p>	<p>We process these data sets to support our business operations. As explained in our Terms, we may receive advertising fees from our Business Partners when a user is redirected to a Business Partner's Website and/or takes certain actions with the Business Partner. We therefore process this data primarily to calculate and attribute advertising fees and to maintain records for accounting, audit, and other legitimate business purposes.</p> <p>We may also use these data sets on an aggregated basis to improve our content and campaigns and to generate insights about user satisfaction and the relative popularity of Business Partners' offers (for example, where statistics show a high level of engagement with a particular Business Partner).</p>	<p>We process these data subject to our legitimate interests.</p>
<p><b><u>Advertising Campaigns Interactions</u></b></p> <p>When we advertise our websites and the Services, we may use third-party providers or tools to manage and measure these campaigns. Through these tools, we collect information about the advertising interaction and subsequent activity, such as the ad or campaign you interacted with, the date and time of the interaction, the referring URL or sources, the pages you visit on our websites and whether you subsequently engaged with a Business Partner after being redirected from our website.</p>	<p>We process these data sets to perform, facilitate and optimize our marketing campaigns, ad management and Services.</p>	<p>We process these data sets based on your consent provided through the cookie preference settings. You may withdraw consent at any time by using the cookie settings on our website.</p>
<p><b><u>Contact Information &amp; Communications</u></b></p> <p>If you voluntarily contact us in connection with your interest in our website, support, or other inquiries, by email or through other means of communication, you may be required to provide us with certain information such as your full name, email address, and any additional information you choose to share with us. We will process and retain our correspondence and communications (collectively, "<b>Contact Communications Data</b>").</p>	<p>We process these data sets for the purpose of contacting you and responding to your inquiries or providing you with the support or information you have requested.</p> <p>Our correspondence with you may be processed and stored by us for record keeping purposes, to improve our Services, and where we reasonably determine it is needed for future assistance or to handle any dispute you might have with us.</p>	<p>When you voluntarily contact us, we process such Contact Communications Data based on your consent.</p> <p>In other cases, including for our internal record keeping purposes, Contact Communications Data are processed and stored subject to our legitimate interests.</p>
<p><b><u>Information You Provide in Connection with Advertiser Services</u></b></p> <p>If you choose to use any quiz, questionnaire, assessment, or similar feature that we make available in connection with Advertiser services, we may collect the information you provide through those features, including your preferences, responses, needs, goals, characteristics, financial information (if applicable), contact information, and other information related to the relevant services that you choose to submit (collectively, "<b>Advertiser Services Data</b>").</p>	<p>We process these data sets to operate and provide Advertiser services and related interactive features, evaluate and analyze your responses and generate, display, or provide the most relevant match, recommendations, offer, service, or other content based on the information you submit.</p> <p>We may also use Advertiser Services Data to improve our Services, matching methodologies, analytics, and user experience.</p>	<p>Where you voluntarily complete a quiz, questionnaire, assessment, or similar feature, we process the Advertiser Services Data you provide based on your consent.</p>

Please note that, the actual processing operation per each purpose of use and lawful basis detailed in the table above, may differ. Such processing operation usually includes set of operations, made by automated means, such as collection, storage, use, disclosure by transmission, erasure, or destruction. Transfer of Personal Data to third party countries as further detailed in the "**Data Transfer**" Section below is based on the same lawful basis as stipulated in the table above.

In addition, we may process certain Personal Data to prevent potentially prohibited or illegal activities, fraud, misappropriation, infringements, identity theft, and any other misuse of the Services, and to enforce the Terms, as well as to protect the security and integrity of our databases and the Services, and to take precautions against legal liability.

## 6. **COOKIES AND SIMILAR TRACKING TECHNOLOGIES**

We use cookies (or similar tracking technologies such as pixels, tags, web beacons, etc.) when you access the website or interact with the Services. The use of cookies is a standard industry practice. These technologies are small pieces of text or code, or other information, that a website stores on your computer, device, or browser when you visit the website. These tracking technologies can be used for various purposes, including enabling

you to navigate between pages efficiently, for analytics and statistical purposes, and for advertising purposes. You can find more information about cookies at: [www.allaboutcookies.org](http://www.allaboutcookies.org).

In addition, please see our **Cookie Settings page**, which describes the cookies we use on our website.

**A. Managing Cookies and Opting Out**

Other than cookies classified as essential or strictly necessary for functionality purposes, you can configure your cookie preferences and opt out of the use of certain cookies (or all non-essential cookies) at any time, using the cookie preference management tool on our Website or through your browser settings. Please note that if you disable cookies, certain services, features, and functionality may not be available to you or may not work properly.

**7. DATA SHARING – CATEGORIES OF RECIPIENTS WE SHARE PERSONAL DATA WITH**

We share your data with third parties, including with trusted partners or service providers that help us provide and improve our Services:

CATEGORY OF RECIPIENT	DATA THAT WILL BE SHARED	PURPOSE OF SHARING
Business Partners	Unique ID, Online Identifiers	When you are directed to a Business Partner’s Website, we will share your unique identifier and may also, where necessary for fraud prevention, security compliance, etc., share your IP address or similar data. Please note that, we share this data only for the purpose of our business operation and tracking conversion.
Trusted agents and service providers	All data, as needed and applicable to the services provides.	We may disclose Personal Data to our trusted agents (such counsel and advisors) and service providers (including, but not limited to, cloud providers, CRM provider, security technologies providers, etc.) so that they can perform the requested services on our behalf. These providers are prohibited from using your Personal Data for any purpose other than providing us with requested services. When we share information with services providers, we ensure they only have access to such information that is strictly necessary for us to provide the requested services. These parties are required to secure the data they receive and to use the data for pre-agreed purposes only while ensuring compliance with all applicable data protection regulations (such service providers may use other non-personal data for their own benefit).
Subsidiaries and affiliated companies or any acquirer of our business	All data	We may share Personal Data, internally within our group or in in the event of a corporate transaction (e.g., sale of a substantial part of our business, merger, consolidation, or asset sale). In the event of the above, our affiliated companies or acquiring company will assume the rights and obligations as described in this Policy.
Advertising Partners	Online Identifiers, Device, Location and Usage Data	Where we use third-party advertising partner’s cookies or services (such as Google, social media, etc.), such third-party may independently collect, through the use of such tracking technologies, Personal Data and may combine such information with other information they have independently collected relating to your online activities across their network of websites, for the purpose of enhanced targeting functionality and delivering personalized ads, as well as providing aggregated analytics related to the performance of our advertising campaign you interacted with. These third parties collect and use this information under their own privacy policies.
Governmental agencies or disclosure due to a legal process	Subject to law enforcement authority request.	We may need to disclose your Personal Data to comply with legal obligations (including court orders and subpoenas), defend against potential, threatened, or actual litigation, or when we are legally obliged to share information with law enforcement.

**8. INTERNATIONAL DATA TRANSFER**

Due to our global operations and the location of our service providers (for example, cloud hosting and storage providers), any Personal Data we collect may be transferred to, stored, and processed in countries other than the country from which you accessed the Services. We transfer Personal Data in compliance with applicable data protection laws, and we take appropriate measures to ensure that your Personal Data receives an adequate level of protection. Such measures may include entering into contractual obligations and/or implementing other valid data transfer mechanisms approved or recognized under applicable law (such as the Standard Contractual Clauses), as applicable. Where required under applicable data protection laws, we will obtain your consent to such transfer.

**9. DATA RETENTION**

As a principal, we will retain the Personal Data we collect only for as long as reasonably necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, regulatory, administrative, recordkeeping, or financial obligations. The criteria we use to determine the applicable retention periods for the Personal Data we collect include the following:

- (i) **Type of Personal Data and purpose of collection:** We consider how long we need to retain the Personal Data to achieve the purposes for which it was collected, as well as the nature and sensitivity of the Personal Data and the potential risk of harm from unauthorized access to, or use of, the Personal Data.
- (ii) **Legal obligations:** The retention period may also depend on the laws applicable to us and/or to the relevant processing activity, as under certain laws we are required to retain certain types of Personal Data. We may also retain Personal Data where required to do so pursuant to a binding legal request or court order.
- (iii) **Disputes, claims, and legal proceedings:** We may retain certain types of Personal Data if we reasonably determine it is necessary to protect our rights, enforce our terms and policies, or defend against threatened or potential claims. In the event of a dispute between you and us, including any legal proceedings, we will retain the relevant Personal Data for as long as necessary to resolve the dispute and comply with applicable legal obligations.

Based on the criteria set forth above, we determine when we no longer have a legal justification for retaining Personal Data, and, at the end of the applicable retention period, we will delete it or de-identify it so that it can no longer be associated with you by reasonable means.

Except to the extent required by applicable law, we are not obligated to retain your Personal Data for any specific period of time, and we may delete it for any reason and at any time, without providing you with prior notice if our intention to do so.

## 10. SECURITY

We implement reasonable technical and organizational security measures designed to reduce the risks of loss, misuse, unauthorized access, disclosure, alteration, or destruction of the Personal Data we process or retain, in accordance with applicable laws. However, no security measures are completely fail-proof, and no method of transmission over the Internet or method of electronic storage is 100% secure. Therefore, while we strive to protect Personal Data, we cannot guarantee that our Services, systems, or databases will be secure or immune from unauthorized access, hacking, malware, communications interception, or other security incidents. As the security of information depends in part on the security of the computer, device, and network you use, you should take appropriate steps to protect your information, such as using strong passwords, keeping your credentials confidential, and ensuring your software and security settings are up to date.

## 11. YOUR PRIVACY CHOICES & RIGHTS

You have certain choices, rights, and controls in connection with the Personal Data collected we collect about you or retain. Depending on your relationship with us and the applicable data protection laws in your jurisdiction, these rights may include one or more of the rights described in the table below, and the ways you can exercise them.

**You may submit a request to exercise most of your privacy rights under applicable privacy laws by contacting our privacy team at [Legal@Optival.com](mailto:Legal@Optival.com).**

EU and UK residents may also submit their requests to our Data Protection Representative, as described in [Section 3](#) above.

We will respond to and fulfill your request within the timeframe required under applicable laws. When you submit a request, we will take steps to verify your identity and your request by matching the information provided by you with the information we have in our records. In some cases, we may request additional information to verify your identity, or, where necessary, to process your request. If we are unable to verify your identity after a good faith attempt, we may deny the request and, if so, will explain the basis for denial and how to remedy any deficiencies, where applicable.

**In addition, certain rights can be easily exercised independently by you without the need to contact us.** For example, you can opt out of receiving our marketing messages by clicking the “unsubscribe” link or following other opt-out instructions provided in the message; you can use the cookies preference management tool on our Website to change your preferences and opt out of cookies, including opting out of the “sale” of Personal Data.

<b>Right to be Informed</b>	You have the right to be provided with information regarding our Personal Data collection and privacy practices. All is detailed under this Privacy Policy, however, if you have any questions or you require for additional information, you may exercise your right by contacting us, as set forth above.
<b>Access Right</b>	You have the right to confirm whether we collect Personal Data about you, as well as to know which Personal Data we specifically hold about you and receive a copy of such or access it. You may exercise your right by contacting us, as set forth above.
<b>Right to Correction/Rectification</b>	You have the right to request any incomplete or inaccurate Personal Data is corrected or deleted, taking into account the nature of the processing and the purposes. You may exercise your right by contacting us, as set forth above.
<b>Right “To Be Forgotten”, Right to Deletion</b>	You have the right to request the erasure of certain Personal Data if specific conditions are satisfied. This right is not absolute. We may reject your request under certain circumstances, including where we must retain the data in order to comply with legal obligations or defend against legal claims, other legitimate interests such as record keeping with regards to our engagements, completing transactions, taking actions reasonably anticipated within the context of our ongoing business relationship with you, detecting security incidents, or exercising another right provided for by law. You may exercise your right by contacting us, as set forth above.
<b>Right to Restrict Processing</b>	You may be entitled to limit the purposes for which we process your Personal Data if one of the following conditions are satisfied: where the accuracy of the Personal Data is contested by you, for a period enabling us to verify the accuracy of the Personal Data; where the processing is unlawful and you oppose the erasure of Personal Data and request the restriction instead; where we no longer need the Personal Data for the purposes of the processing, but we are required by you to retain it for the establishment, exercise or defense of legal claims; where you objected to processing (as detailed below) pending the verification whether our legitimate grounds override your request. You may exercise your right by contacting us, as set forth above.
<b>Right to Data Portability</b>	You have the right to receive a copy of your Personal Data in a portable format and, to the extent technically feasible, readily usable format that allows you to transmit the Personal Data to another entity without

	hindrance. We will select the format in which we provide your copy. You may exercise your right by contacting us, as set forth above.
<b>Right to Withdraw Consent; Right to Opt-Out / Opt-Out of Sale</b>	<u>Right to Withdraw Consent</u> : when we collect and process your Personal Data based on your consent, you have the right to withdraw such consent at any time. <u>Right to Opt-Out/Opt-Out of Sale</u> : you have the right to opt-out from receiving our marketing communications, if applicable, by unsubscribing through the message received. You further have the right to opt out of the “sale” of Personal Data (i.e., to opt out of targeted advertising by us). We do not profile you in a manner that has a significant effect on you or other individuals, therefore we do not provide an opt-out option from such use of Personal Data.
<b>Right to Appeal or Lodge Complaint</b>	If we decline to take action on your request, we will inform you as required under applicable laws. The notification will include a justification for declining to take action. Under the GDPR you have the right to lodge a complaint with the applicable <a href="#">Data Protection Authority</a> in the EU or the Information Commissioner in the UK.

## 12. ELIGIBILITY AND CHILDREN PRIVACY

The Services are not intended for use by children (a “child” means an individual under the age defined by applicable law), and we do not knowingly collect or otherwise process Personal Data relating to children. If we become aware that we have collected Personal Data from a child, we will take reasonable steps to delete or de-identify such information as soon as reasonably practicable.

## 13. LINKS TO OTHER SITES

Our websites and Services may include links to third-party websites, including Business Partners' websites. If you click on a third-party link or enable a third-party connection, the relevant third party may collect or receive information about you, including through cookies or similar technologies. We do not control, and are not responsible for, the privacy practices of these third parties, and their practices are governed by their own privacy policies. If you wish to exercise your rights in relation to information processed by a Business Partner, you should contact that Business Partner directly.

## 14. JURISDICTION SPECIFIC NOTICES

### ***A. Additional Notice to California Residents***

This section applies only to California residents pursuant to the CCPA.

Please see the [CCPA Privacy Notice](#) which discloses the categories of “personal information” collected, purpose of processing, source, categories of recipients with whom the “personal information” is shared for a “business purpose”, whether the personal information is “sold” or “shared”, the retention period, and how to exercise your rights as a California resident.

### ***B. Additional Notice to U.S Residents***

Residents of certain U.S states (depending on the applicable state law, acting as an individual or in the household context only and not in a commercial or employment context, as a job applicant or as a beneficiary of someone acting in an employment context or as representative of a business), may have additional rights under applicable privacy laws and be entitled to additional disclosures.

“**Personal Data**” under applicable US privacy laws, generally means any information that is linked or reasonably linkable to an identified or identifiable individual (and usually does not include publicly available information that is lawfully made available from government records, or that a consumer has otherwise made available to the public; de-identified or aggregated consumer information; or information excluded from the states laws scope, such as: HIPAA, GBPA, non-profit entities, etc.)

“**Sensitive Data**” means data revealing racial or ethnic origin, religious beliefs, mental or physical health condition or diagnosis, sex life, sexual orientation, citizenship, or immigration status; The processing of genetic or biometric data for the purpose of uniquely identifying an individual; Personal Data collected from a known child; Precise geolocation data.

We are required to provide you with a clear and accessible privacy notice that includes the categories of Personal Data processed, purpose of processing, instructions for exercising consumer rights and appealing decisions, categories of Personal Data shared with third parties, categories of third parties with whom data is shared, and any sale of data or targeted advertising.

### **Categories of Personal Data & Categories of third parties with whom Personal Data is shared:**

In [Section 5](#) to the Privacy Policy, we describe our collection and processing of Personal Data, the categories of Personal Data that are collected or processed, and the purposes for which Personal Data is processed, stored or used. We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated, or incompatible purposes without obtaining your consent, unless we are otherwise entitled, required or permitted under applicable laws.

Additionally, [Section 7](#) to this Privacy Policy details and discloses the categories of third-parties we share for business purposes.

### **“Sale” of Personal Data:**

Under certain US privacy laws, the term “sale” may include disclosing or making available Personal Data to a third party in exchange for monetary or other valuable consideration, and in some cases may also include certain disclosures for targeted advertising. We do not “sell” Personal Data as that term is commonly understood, meaning we do not disclose your Personal Data to third parties in direct exchange for money. However, depending on the applicable law and the specific circumstances, our use of cookies and similar technologies and certain third-party advertising services, and related disclosures of Personal Data, may be considered a “sale” (or “sharing”) of Personal Data. The categories of Personal Data that may be disclosed for these purposes include: online identifiers (such as IP address and cookie ID); internet or other electronic network activity information (Device and Usage Data, such as your engagement with our Services); and geolocation data (such as country-level location derived from IP address) (each as described in [Section 4](#)).

You have the right to opt out of such “sale” at any time by adjusting your preferences using the cookie preference tool available on our website.

### **Consumer Rights Related to Their Personal Data:**

Residents of certain U.S. states may have additional rights under applicable privacy laws, subject to certain limitations, which may include:

Access - the right to confirm whether we are processing their Personal Data and to obtain a copy of their Personal Data in a portable and, to the extent technically feasible, readily usable format.

Delete - the right to request us to delete their Personal Data provided to or obtained by us.

Correct - the right to request us to correct inaccuracies in their Personal Data, taking into account the nature and purposes of the processing of the Personal Data.

Opt-Out - the right to opt out of certain types of processing, including: (i) to opt out of the "sale" of their Personal Data; (ii) to opt out of targeted advertising by us; and (iii) to opt out of any processing of Personal Data for purposes of making decisions that produce legal or similarly significant effects.

[Section 11](#) to this Privacy Policy provides additional information regarding your privacy rights.

**Exercising Consumer Privacy Rights:**

You may submit a request to exercise most of your privacy rights under applicable US privacy laws by contacting us at: [Legal@Optival.com](mailto:Legal@Optival.com).

We will take steps to verify your identity and your request by matching the information provided by you with the information we have in our records. In some cases, we may request additional information to verify your identity, or where necessary to process your request. If we are unable to verify your identity after a good faith attempt, we may deny the request and, if so, will explain the basis for denial and how to remedy any deficiencies, where applicable.

Authorized agents may initiate a request on behalf of another individual, provided that such will be required to provide proof of their authorization, and we may also require that the individual directly verify his/her identity and the authority of the authorized agent.

We will respond to your request within the timeframe required under applicable law, and we reserve the right to extend the response time subject to applicable law requirements. If we refuse to take action on a request, we will notify you and our notification will include a justification for declining to take action and instructions on how you may appeal. Within the timeframe set out under applicable law of our receipt of your appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied, you may submit a complaint to the applicable authority or Attorney General of your jurisdiction.