

PRIVACY POLICY

This notice describes the privacy policy (“**Privacy Policy**” or “**Policy**”) of www.TurboDocx.com/ (hereinafter referred to as the “**Website**” or “**Platform**”) which is operated by **TURBODOCX, INC.**, having its principal office at **201 N US HIGHWAY 1 STE D10 #1085 Jupiter, FL 33477** (hereinafter referred to the “**TurboDocx**” or “**us**” or “**our**” or “**we**”). In this Policy, you shall be referred as “**you**” or “**your**” or “**user**” or “**users**”.

This **Privacy Policy** explains what information of yours will be collected by us when you access the Website or make the payment or use our services, how the information will be used, and how you can control the collection, correction, and/or deletion of the information. We will not knowingly use or share your information with anyone, except as described in this Privacy Policy. The use of information collected by us shall be limited to the purposes described under this Privacy Policy and our Terms of Service.

By using our Site or providing your personal information to us, you are accepting and consenting to the practices described in this policy. Please note that this includes consenting to the processing of any personal information that you provide, as described below.

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1. What information about the users do we collect?

- a) **Information that you provide us:** We collect the information you provide when you use our Site or our services, including without limitation, when you sign up for an account, make the payment to purchase any of our paid subscription plans, use our services for creating deliverables, collaborate with your team on our platform, share your feedback, submit a complaint, communicate or interact with us in any manner. This can include **Personally Identifiable Information (PII)** as well as **non-PII information**. **Examples include the following:**
- i. **Your personal details:** Your full name, phone number, and email.
 - ii. **Messages:** Team messages, notes and other collaboration records.
- b) **Content that you create or upload:** We collect the content that uploads on the platform, or the deliverables that you create using our services. However, we maintain the confidentiality of such content and do not share the same with any third-party. Moreover, you are free to move or delete the content from our platform at any time at your sole discretion.
- c) **Information about your Activities:** We may also collect information about how you use our services, such as the content you engage with, templates that you use, or the frequency and duration of your activities.
- d) **Information that we collect when you use the Website:** We may also collect information while you access, browse or view the Site. In other words, when you access the Website, we may be aware of your usage of the Website, and gather, collect and record the information relating to such usage, operating system, make & ID, IP address, device ID and type, settings and characteristics, Site crashes, identifiers associated with cookies or other technologies that may uniquely identify a device. This helps us in providing our services to the users and making improvements in the services, fixing errors and bugs.
- e) **Customer Care:** If you contact our customer support via emails, in those cases, we collect all your interactions with our customer support.
- f) **Information that we collect from third party sources:** You can engage with us through social media platforms or mobile applications. When you engage with us through social media platforms, such as Google, you allow us to have access to certain information from your social media profile based upon your privacy preference settings on such a platform.
- g) **Payment Information:** When you subscribe to one of our plans, then you provide our third-party payment service provider, namely, **Stripe**, with your credit or debit card information. We don't collect your payment card details. For payments, we redirect you to **Stripe**, which collects and processes your payment request. You can find the privacy policy of **Stripe** on this [link](#).
- h) **Good Judgment:** We suggest that you exercise good judgment and caution while providing your personal information.

2. What is the lawful basis for which we use your personal information?

For the purposes of applicable law, the Data Controller for the data that you submit to us is **TURBODOCX, INC.**, having its principal office at 201 N US HIGHWAY 1 STE D10 #1085 Jupiter, FL 33477. You hereby acknowledge that all processing of your personal information will be justified by a *"lawful ground"* for processing. In the majority of cases, processing will be justified on the basis that:

- **Consent:** You have given your consent for processing personal data for one or more specific purposes.
- **Performance of a contract:** Provision of personal data is necessary for the performance of an agreement with you and/or for any pre-contractual obligations thereof.
- **Legal obligations:** Processing personal data is necessary for compliance with a legal obligation to which we are subject.
- **Vital interests:** Processing personal data is necessary in order to protect your vital interests or of another natural person.
- **Public interests:** Processing personal data is related to a task that is carried out in the public interest or in the exercise of official authority vested in the TurboDocx.
- **Legitimate interests:** Processing personal data is necessary for the purposes of the legitimate interests pursued by the TurboDocx.

In any case, we will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract. Feel free to contact us for this purpose at team@turbodocx.com.

3. How do we use this information?

We use all of the information we have to help us provide, support and improve our services. We use the information collected from you for one or more of the following purposes:-

- a) To provide you the services requested by you;
- b) To enable you to create deliverables;
- c) To process your payments;
- d) To assess queries, requirements, and process requests for various services;
- e) To process your refund request;
- f) To improve our Site and services;
- g) To be able to deliver our services, personalize content, and make suggestions for you by using this information to understand how you use and interact with our services and the people or things you're connected to and interested in on and off our services.
- h) We use your information to send you marketing communications, newsletter, communicate with you about our services and let you know about our policies and terms. We also use your information to respond to you when you contact us.

- i) We also use your information to ensure our services are working as intended, such as tracking outages or troubleshooting issues that you report to us. And we use your information to make improvements to our services.
- j) We use information to help improve the safety and reliability of our services. This includes detecting, preventing, and responding to fraud, abuse, security risks, and technical issues that could harm TurboDocx, our community, or the public.
- k) To respond to summons, court orders, directions or other judicial processes.
- l) To provide information to law enforcement agencies or in connection with an investigation on matters related to public safety.

4. Deleting your information

Your account and the information that you provide us is yours. You can at any time delete the same. However, you acknowledge that we may also retain some of the information so deleted for a reasonable period of time in order to comply with legal requests. You can request us to delete your information by writing to us at team@turbodocx.com.

5. Cookies and Similar Technologies

Cookies are bits of electronic information that a website may transfer to a visitor's computer to identify specific information about the visitor's visits to other websites. We may use automated technologies including the use of web server logs to collect IP addresses, device details, cookies and web beacons. The Website uses a browser feature known as a cookie, which assigns a unique identification to your computer. However, in case you do not wish for us to collect such information, simply change the cookie settings on your web browser.

6. Sharing of Information

- a) We may share some of your personal as well as non-personal information with our following third-party hosting service providers:
 - i. For front-end app that does not contain customer data - namely, [Cloudflare](#).
 - ii. For data storage – [Amazon Web Services \(AWS\)](#) servers located in the **United States**.
- b) When you subscribe to one of our plans, then you provide our third-party payment service provider, namely, **Stripe**, with your credit or debit card information. We don't collect your payment card details. For payments, we redirect you to **Stripe**, which collects and processes your payment request. You can find the privacy policy of **Stripe** on this [link](#).
- c) We may also share some of your information with our following third-party service providers:
 - i. **Auth0** – for the purposes of customer identity and access management, including for sign-up/sign in. You can find its privacy policy at <https://auth0.com/privacy>.
 - ii. **CloudFare** – used for the purposes of hosting the front end of TurboDocx applications. You can find its privacy policy at <https://www.cloudflare.com/privacypolicy/>.
 - iii. **TypeDream** – used for the purposes of hosting TurboDocx's landing page. You can find its privacy policy at https://typedream.sfo3.digitaloceanspaces.com/Typedream_Privacy_Policy.pdf.

- iv. **GetWaitlist.com** - used for the purposes of signing up for the TurboDocx waitlist. You can find its privacy policy at <https://help.getwaitlist.com/en/articles/4555104-privacy-policy>.
 - v. **Google and Youtube**- used for the purposes of Google Drive import/export and video hosting. This is also used for the purposes of Targeted Advertising across their various products. We may also use Google Analytics to measure the performance of these efforts. You can find its privacy policy at <https://policies.google.com/privacy>
 - vi. **CKEditor** – it is TurboDocx’s web text editor. You can find its privacy policy at <https://ckeditor.com/legal/privacy-policy/>.
 - vii. **OpenAI** – it is TurboDocx’s AI Vendor. TurboDocx has a data processing addendum in place, however, you can find its policies at <https://openai.com/policies>
 - viii. **Meta** - is used for the purpose of Targeted Advertising across the various Meta products. You can find its privacy policy at <https://www.facebook.com/privacy/policy/>
 - ix. **LinkedIn** - is used for the purpose of Targeted Advertising across the various LinkedIn products. You can find its privacy policy at <https://www.linkedin.com/legal/privacy-policy>
 - x. **Reddit**- is used for the purpose of Targeted Advertising across the various Reddit products. You can find its privacy policy at <https://www.reddit.com/policies/privacy-policy>
- d) We keep your information safe and do not share your information with any other third party. However, if we merge with or are acquired by another company or we sell our Website or business unit, or if all or a substantial portion of our assets are acquired by another company, in those cases, your information will likely be one of the assets that would be transferred.
- e) We may also share your information in response to legal requests. Please refer to [Section 12](#).

7. Storage and Security of Information

- a) **Storage:** Your data is stored through AWS’s data storage, databases and servers located in the United States. We also store some of the information collected by us on our servers and do not share it with any third party, except for the limited purposes as mentioned in the [Section 6](#). The servers and databases in which information may be stored may be located outside the country from which you accessed this Site, and in a country where the data protection and other laws may differ (*and be less stringent*) from your country of residence. **You hereby consent to any such cross-border transfer of your personal information.**
- b) **Retention:** Personal information that we collect, access or process will be retained only so long as necessary for the fulfillment of the purposes for which it was collected, as necessary for our legitimate business purposes, or as required or authorized by law. Personal information that is no longer required to fulfill the identified purposes will be destroyed, erased or made de-identified or anonymous.
- c) **Steps taken by us to protect your data:** We regularly take the following steps to protect the integrity of your information:
 - We protect the security of your information while it is being transmitted by using secure connection;

- We use computer safeguards such as firewalls to keep this data safe;
- We only authorize access to employees and trusted partners who need it to carry out their responsibilities;
- We regularly monitor our systems for possible vulnerabilities and attacks, and we carry out penetration testing to identify ways to further strengthen security; and
- We will ask for proof of identity before we share your personal data with you.

d) **Security:** We employ reasonable security practices to ensure that the information is safe and secure with us. However, no information on the internet is 100% safe, and you accept and acknowledge such risk. Also, we will disclose the information so collected for limited purposes as mentioned in this Privacy Policy.

8. Links to other Sites

The Site may contain links to third-party websites and online services that are not owned or controlled by us. We have no control over, and assume no responsibility for such websites and online services. Be aware when you leave the Website; we suggest you read the terms and privacy policy of each third-party website, and online service that you visit.

9. California Resident Rights

This section of the Policy applies to you, if you are a California resident, as per **California Consumer Policy Act, 2018** (simply called “CCPA”) and **California Online Privacy Protection Act** (simply called “COPPA”). This privacy notice section for California residents supplements the information contained in our Privacy Policy and it applies solely to all visitors, users, and others who reside in the State of California.

Categories of Personal Information Collected

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device. The following is a list of categories of personal information which we may collect or may have been collected from California residents within the last twelve (12) months.

Please note that the categories and examples provided in the list below are those defined in the CCPA. This does not mean that all examples of that category of personal information were in fact collected by us, but reflects our good faith belief to the best of our knowledge that some of that information from the applicable category may be and may have been collected. For example, certain categories of personal information would only be collected if you provided such personal information directly to us.

- **Category A: Identifiers.**

Examples: A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, driver's license number, passport number, or other similar identifiers.

Collected: Yes.

- **Category B: Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).**

Examples: A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.

Collected: Yes.

- **Category C: Protected classification characteristics under California or federal law.**

Examples: Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).

Collected: No.

- **Category D: Commercial information.**

Examples: Records and history of products or services purchased or considered.

Collected: Yes.

- **Category E: Biometric information.**

Examples: Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.

Collected: No.

- **Category F: Internet or other similar network activity.**

Examples: Interaction with our Service or advertisement.

Collected: Yes.

- **Category G: Geolocation data.**

Examples: Approximate physical location.

Collected: Yes.

- **Category H: Sensory data.**

Examples: Audio, electronic, visual, thermal, olfactory, or similar information.

Collected: No.

- **Category I: Professional or employment-related information.**

Examples: Current or past job history or performance evaluations.

Collected: No.

- **Category J: Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).**

Examples: Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.

Collected: No.

- **Category K: Inferences drawn from other personal information.**

Examples: Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Collected: No.

We use the personal information that we collect or receive for the business purposes as described above. We may disclose the above listed categories of personal information to third parties for business purposes as described above. As previously mentioned in this Policy, we do not “sell” (as such term is defined in the CCPA) personal information.

You are entitled to the following specific rights under the CCPA in relation to personal information related to you:

- You have a right to request that we will disclose certain information to you about our collection and use of personal information related to you over the past 12 months, including: (i) The categories of personal information that we collect about you; (ii) The categories of sources from which the personal information is collected; (iii) The purposes for collecting, using, or selling that personal information. (iv) The categories of personal information that we disclosed for a business purpose or sold, and the categories of third parties to whom we disclosed or sold that particular category of personal information. (v) The specific pieces of personal information that we have collected about you.
- You have a right to request that we delete personal information related to you that we collected from you under certain circumstances and exceptions.
- You also have a right not to be discriminated against for exercising your rights under the CCPA.
- You also have a right to submit your request via an authorized agent. If you use an authorized agent to submit a request to access or delete your personal information on your behalf, the authorized agent must:

(1) be a person or business entity registered with the California Secretary of State to conduct business in California; (2) provide proof of such registration; and (3) provide documentation or other proof indicating that they are authorized to act on your behalf. We may also require you to verify your identity directly with us, and directly confirm with us that you provided the authorized agent permission to submit the request.

To make such requests, please contact us at team@turbodocx.com

We will verify your request using the information associated with your account, including email address. Government identification may also be required.

A request for access can be made by you only twice within a 12-months period. Any disclosures that we provide will only cover the 12-months period preceding receipt of your request. We do not charge a fee to process or respond to your verifiable User request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will inform you of the reasons for such a decision and provide you with a cost estimate before processing further your request.

10. Notice for Nevada Residents

Under Nevada law, certain Nevada residents may opt out of the sale of “personally identifiable information” for monetary consideration to a person for that person to license or sell such information to additional persons.

“**Personally identifiable information**” includes first and last name, address, email address, phone number, social security number, or an identifier that allows a specific person to be contacted either physically or online.

Please note, we do not sell your personal information to anyone.

11. Rights of Data Subjects from other Jurisdictions

Depending upon the laws of your jurisdiction, you may be eligible for some or all of the following rights in respect of your personal information:

- i. **Right to obtain information:** You may have a right to obtain information about how and on what basis your personal information is processed and to obtain a copy.
- ii. **Right to rectification:** You may have the right to have any incomplete or inaccurate information we hold about you rectified and corrected.
- iii. **Right of Erasure:** You may have the right to erase your personal information in limited circumstances where (a) you believe that it is no longer necessary for us to hold your personal information; (b) we are processing your personal information on the basis of legitimate interests and you object to such processing, and we cannot demonstrate an overriding legitimate ground for the processing; (c) where you have provided your personal information to us with your consent and you wish to withdraw your consent and there is no other ground under which we can process your personal information; and (d) where you believe the personal information we hold about you is being unlawfully processed by us.

- iv. **Right of restriction:** You may have the right to restrict processing of your personal information where: (a) the accuracy of the personal information is contested; (b) the processing is unlawful but you object to the erasure of the personal information; (c) we no longer require the personal information for the purposes for which it was collected, but it is required for the establishment, exercise or defense of a legal claim or (d) you have objected to us processing your personal information based on our legitimate interests and we are considering your objection.
- v. **Right to object:** You may have the right to object to decisions which are based solely on automated processing or profiling.
- vi. **Right to ask for a copy:** Where you have provided your personal information to us with your consent, you may have the right to ask us for a copy of this data in a structured, machine-readable format and to ask us to share (port) this data to another data controller; or to obtain a copy of or access to safeguards under which your personal information is transferred outside of your jurisdiction.
- vii. **Right to withdraw your consent.** You may have the right to withdraw your consent on using your personal data. If you withdraw your consent, we may not be able to provide you with access to certain specific functionalities of our services.
- viii. **Request the transfer of your Personal Data.** If you so have this right, we will provide to you, or to a third-party you have chosen, your personal data in a structured, commonly used, machine-readable format. Please note that this right may only apply to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

To make such requests, please contact us at team@turbodocx.com. Please note, we reserve the right to reject the request if you are not entitled to the right that you request to enforce.

12. How do we respond to legal requests?

We may access, preserve and share your information in response to a legal request (like a search warrant, court order or subpoena/summon) if we have a good faith belief that the law requires us to do so. This may include responding to legal requests from law enforcement agencies, courts, tribunals and government authorities. We may also access, preserve and share information when we have a good faith belief it is necessary to: detect, prevent and address fraud and other illegal activity; to protect ourselves, you and others, including as part of investigations; or to prevent death or imminent bodily harm. We also may retain information from accounts disabled for violations of our terms for at least a year to prevent repeat abuse or other violations of our terms.

13. Children Privacy

Protecting children's privacy is important to us, and therefore our Site or our services are not intended for children. We do not direct the Site or our services to, nor do we knowingly collect any personal information from, such children. Minors are not allowed to use our Platform without their parent/guardian's express written consent in which case the parent/guardian shall read, understand and consent to our Terms, Privacy Policy and other policies on behalf

of their minor children, and such consent shall be received by us through such parent/guardian's email address. If we learn that a child has provided personally identifiable information to us, we will use reasonable efforts to remove such information from its database. **Please contact us at team@turbodocx.com if you believe we knowingly or unknowingly collected information described in this Section.**

14. How can I withdraw my consent? (OPT-OUT)

If you sign up, you will automatically start receiving promotional emails and direct mail from us. If after you opt-in, you change your mind, you may withdraw your consent for us to contact you, for the continued collection, use or disclosure of your information, at any time, by contacting us at team@turbodocx.com.

15. Governing law and Dispute Resolution

Unless provided by the relevant statute, rules or directives applicable to the jurisdiction in which you reside, in case of any disputes, issues, claims or controversies arising out of or in relation to your use of the Site or our services, the governing law and dispute resolution mechanism as provided in the **Terms of Service** shall apply to this **Privacy Policy** as well.

16. Do you have questions or concerns about this Privacy Policy?

In the event you have any grievance regarding anything related to this Privacy Policy, Terms of Service, or with any content or service of TurboDocx, in that case you may freely write your concerns through your registered email to Grievance Officer/Designated Representative to below:

- **Name:** Nicolas Fry
- **Designation:** CEO
- **Email:** team@turbodocx.com
- **Postal:** 201 N US HIGHWAY 1 STE D10 #1085 Jupiter, FL 33477

17. Updates to this Policy

We may add to or change or update this **Privacy Policy** at any time, from time to time, entirely at our own discretion, with or without any prior written notice. You are responsible for checking this Policy periodically. Your use of the Site/services after any amendments to this Policy shall constitute your acceptance to such amendments.

18. Welcoming of suggestions

We welcome your comments regarding this Privacy Policy. Please write to us at team@turbodocx.com.

Last updated on **September 01, 2022**