

# Privacy Policy

Last modified: **April 10, 2019**

## I. Introduction

Lumina Datamatics, Inc. (“**Lumina Datamatics**”, “**us**” or “**we**”) respect your privacy and are committed to protecting it through our compliance with this Privacy Policy (the “**Policy**”).

This Policy describes the types of information we may collect from you or that you may provide when you visit the website <http://www.luminadatamatics.com> (our “**Website**”) and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Policy applies to information we collect:

- On this Website.
- In email, text, and other electronic messages between you and this Website.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by Lumina Datamatics or any third party (including our affiliates and subsidiaries); or
- Any third party (including our affiliates and subsidiaries), including through any application or content that may link to or be accessible from or on the Website.

This Policy is incorporated by reference into the Website [Terms of Use](#) to which you agreed upon entering the Website, registering with us, or signing up for our services. Please read this Policy carefully to understand our policies and practices regarding your information and how we will treat it. By accessing or using this Website, you agree to this Policy. If you do not agree with this Policy, your choice is not to use our Website. This Policy may change from time to time. Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check this Policy periodically for updates.

This Policy explains:

[Children Under the Age of 16](#)

[Information We Collect About You](#)

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## II. Children Under the Age of 16

Our Website is not intended for children under 16 years of age. No one under age 16 may provide any information to or on the Website. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on this Website or on or through any of its features, register on the Website, make any purchases through the Website, use any of the interactive or public comment features of this Website or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us [DPO@luminad.com](mailto:DPO@luminad.com).

## III. Information We Collect About You

We may collect, use, store and transfer several types of information from and about users of our Website which we have grouped together as follows:

- **Identity Information** includes first name, maiden name, last name, username or similar identifier.
- **Contact Information** includes billing address, delivery address, email address and telephone numbers.
- **Financial Information** includes bank account and payment card details.
- **Transaction Information** includes details about payments from you and other details of products and services you have purchased from us.
- **Technical Information** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this Website.
- **Profile Information** includes your username and password, purchases or orders made by you, your interests, and preferences.
- **Usage Information** includes information about how you use our Website.

- **Marketing and Communications Information** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

Information by which you may be personally identified and any other identifier by which you may be contacted online or offline is considered “**personal information**.”

We also collect, use and share **Aggregated Information** such as statistical or demographic information for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your usage information to calculate the percentage of users accessing a specific feature of the Website. However, if we combine or connect Aggregated Information with your personal information so that it can directly or indirectly identify you, we treat the combined data as personal information which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Information** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

#### **IV. How We Collect Information**

We use different methods to collect data from and about you including through:

**Direct Interactions.** The information we collect on or through our Website may include information directly provided to us by you, including:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of registering to use our Website, subscribing to our services, posting material, or requesting further services. We may also ask you for information when you report a problem with our Website.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Details of transactions you carry out through our Website and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our Website.
- Your search queries on the Website.

**User Contributions.** You also may provide information to be published or displayed (hereinafter, “**posted**”) on public areas of the Website or transmitted to other users of the Website or third parties (collectively, “**User Contribution**”). Your User Contributions are posted on and transmitted to others at your own risk. Although you may set certain privacy settings for such information by logging into your account profile, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Website with whom you may choose to share your User Contributions. Therefore,

we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

**Third parties or publicly available sources.** We may receive information about you [if you visit other websites employing our cookies or] from third parties including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies, data brokers or aggregators.

**Automated technologies or interactions.** As you interact with our Website, we may automatically collect technical data about your equipment, browsing actions and patterns as specified above. We collect this information by using cookies and other similar technologies (see [Cookies and Automatic Data Collection Technologies](#)).

## **V. Cookies and Automatic Data Collection Technologies**

Our Website uses cookies (small files placed on your device) or other automatic data collection technologies to distinguish you from other Website users. This helps us deliver a better and more personalized service when you browse our Website. It also allows us to improve our Website by enabling us to:

- Estimate our audience size and usage patterns.
- Store your preferences so we may customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (“behavioral tracking”).

Certain internet browsers may offer you the option of providing notice to websites that you do not wish for your online activities to be tracked for preference-based advertising purposes (“**DNT Notice**”). Some browsers are, by default, set to provide a DNT Notice, whether that reflects your preference. Please note that with respect to our Website, we do not take any action based on browser based DNT Notices. If you do not wish to participate in preference-based advertising activities, you should follow the opt-out process described in [Consent to Transfer and Storage in the United States](#) below.

You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, certain parts of our Website may become inaccessible and certain features may not work correctly. Unless you adjust your browser settings to refuse cookies, our system will issue them.

Certain features of our Website may use Flash cookies (local stored objects) instead of browser cookies to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies and browser cookies use different management tools and you

must manage their settings separately. For information about managing your Flash cookie privacy and security settings, see [Choices About How We Use and Disclose Your Information](#).

Our Website pages and e-mails may contain web beacons (small transparent embedded images or objects, also known as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count website page visitors or email readers, or to compile other similar statistics such as recording Website content popularity or verifying system and server integrity.

## **VI. Third-Party Use of Cookies and Other Tracking Technologies**

Some content or applications, including advertisements, on the Website are served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites, and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see [Choices About How We Use and Disclose Your Information](#).

## **VII. How We Use Your Information**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- To **fulfill a contract**, or take steps linked to a contract between us. This includes:
  - To register you for an account with Lumina Datamatics;
  - To provide you with notices about your account.
  - To provide services or other products or services that you have requested from us, as instructed by you; and
  - To process payments, billing, and collection.
- As required by us to conduct our business and pursue our **legitimate interests**, in particular:
  - To present our Website and its contents to you.
  - To fulfill any other purpose for which you provide it.
  - To exercise or defend our legal rights.
  - To notify you about changes to our Website or any products or services we offer or provide though it.
  - To allow you to participate in interactive features on our Website.

- Ensure that we present our Website content in the most effective manner for you and for your computer.
  - Administer our Website and conduct internal operations, including for troubleshooting, data analysis, testing, research, statistical and survey purposes.
  - Improve our Website, products or services, marketing, or customer relationships and experiences.
  - Protect our Website, employees or operations.
  - Measure or understand the effectiveness of the advertising we serve to you and others, and to deliver relevant advertising to you;
  - Make suggestions and recommendations to you and other users of our Website about goods or services that may interest you or them.
  - To communicate with you to keep you up-to-date on the latest developments, announcements, and other information about our Website and services.
  - to send you marketing information or in connection with other promotional activities.
  - To contact you about our own and third-parties' goods and services that may be of interest to you. If you do not want us to use your information in this way, please check the relevant box located on the form where we collect your data or adjust your user preferences in your account profile. For more information, see [Choices About How We Use and Disclose Your Information](#).
  - To enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.
- Necessary to comply with a **legal obligation**;
  - Based on your **consent**, which may subsequently be withdrawn at any time by contacting us as stated in [Consent to Transfer and Storage in the United States](#) below, without affecting the lawfulness of processing based on consent before its withdrawal.

We will only provide you with marketing-related information when we have a previous contractual relationship or business relationship with you, and you have not opted-out to receive those communications. You have the opportunity to opt-out at any time as explained in the [Contact and Opt-Out Information](#) section of this Policy.

We may use non-personal information for any business purpose.

### **VIII. Disclosure of Your Information**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this Policy:

- To our subsidiaries and affiliates.
- To business partners, contractors, service providers, and other third parties we use to support our business and who obligated to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all Lumina Datamatics' assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Lumina Datamatics about our Website users is among the assets transferred.
- To third parties to market their products or services to you if you have not opted out to these disclosures. For more information see [Choices About How We Use and Disclose Your Information](#).
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our Website [Terms of Use](#) and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Lumina Datamatics, our customers, or others.

We may share non-personal information without restriction.

## **IX. Choices About How We Use and Disclose Your Information**

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Promotional Offers from the Company.** If you do not want us to use your contact information to promote our own products and services, or third parties' products or services, you can opt-out by checking the relevant box located on the form where we collect your data or at any other time by logging into the Website and checking or unchecking the relevant boxes to adjust your account profile's user preferences, or by sending us an email with your request to [mars@luminad.com](mailto:mars@luminad.com). You may also opt-out of further marketing communications by replying to any promotional email we have sent you or following the opt-out links on that message. This opt out does not apply to

information provided to the Company as a result of a product purchase, warranty registration, product service experience or other transactions.

- **Third-Party Advertising.** If you do not want us to share your personal data with unaffiliated or non-agent third parties for promotional purposes, you can opt-out by checking the relevant box located on the form where we collect your data.
- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's [website](#). If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- **Targeted Advertising.** If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target-audience preferences, you can opt-out as provided in [Consent to Transfer and Storage in the United States](#) below.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way you can opt-out of receiving personalized ads from advertisers and ad networks that are members of the Network Advertising Initiative ("**NAI**") or who follow the DAA Self-Regulatory Principles for Online Behavioral Advertising using their respective opt-out tools. The NAI's opt-out tool can be found [here](#) and the DAA's opt out tool can be found [here](#).

- **Links to Third-Party Websites.** Our Website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates, or plug-ins enabling third-party features. If you follow a link to any third-party website or engage a third-party plug-in, please note that these third parties have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these third parties.

## **X. Accessing and Correcting Your Information**

You can review and change your personal information by logging into the Website and visiting your account profile page.

You may also send us an email at [DPO@luminad.com](mailto:DPO@luminad.com) to request access to, correct or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you delete your User Contributions from the Website, copies of your User Contributions may remain viewable in cached and archived pages or might have been copied or stored by other Website users. Proper access and use of information provided on the Website, including User Contributions, is governed by our Terms of Service.



If you are in the European Union or the European Economic Area, you may have additional rights and choices. Please see [INFORMATION FOR PERSONS IN THE EUROPEAN UNION AND EUROPEAN ECONOMIC AREA](#) below.

## **XI. Your California Privacy Rights**

California Civil Code Section § 1798.83 permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please contact us at [DPO@luminad.com](mailto:DPO@luminad.com).

## **XII. Data Security**

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

## **XIII. Changes to Our Privacy Policy**

It is our policy to post any changes we make to our Policy on this page with a notice that the Policy has been updated on the Website home page. If we make material changes to how we treat our users' personal information, we will notify you by email to the primary email address specified with your account and/or through a notice on the Website's home page. The date the Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this Policy to check for any changes.

## **XIV. Consent to Transfer and Storage in the United States**

Lumina Datamatics is a United States company. If you are visiting this Website from outside the United States, please be aware that you are sending information (including personal information) to the United States where our servers are located. By using the Services, or providing us with any information, you fully understand and unambiguously consent to this transfer, processing, and storage of your information in the United States and other jurisdictions, which may not have data protection laws as comprehensive or protective as those in your country of residence or where you are a citizen. As a result, this information may be subject to access requests from governments, courts, or law enforcement in the United States

and other countries according to laws in those jurisdictions. Your information will also be disclosed to third parties as described in this Policy.

## **XV. INFORMATION FOR PERSONS IN THE EUROPEAN UNION AND EUROPEAN ECONOMIC AREA**

This section of the Policy applies only if you use our Website or otherwise provide us with personal data from a country that is a Member State of the European Union or European Economic Area (collectively, “EU”), and it supplements the information in the remainder of our Policy, above.

Lumina Datamatics Inc. is a “controller” as that term is defined in the General Data Protection Regulation (“**GDPR**”) and other relevant data protection laws. Our contact information is in [Contact and Opt-Out Information](#). We do not knowingly sell our services to children under the age of 16.

- **Legal Basis for Data Processing.**

Our legal bases to process personal data are set forth in [How We Use Your Information](#) above.

We will not use your personal data for taking any automated decisions affecting or creating profiles other than as described above.

- **Disclosure of your Personal Data**

We will disclose your personal data as set forth in [Disclosure of Your Information](#) above.

- **Change of Purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us as set forth in [Contact and Opt-Out Information](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

- **EU Data Subject Rights and Data Retention**

The GDPR provides certain rights for EU data subjects. You can access information about you and update or correct it. In some cases, you can also ask us to erase it, restrict or stop processing, or provide data in a “portable” form, if feasible. You may withdraw consent (“opt-out”) if you have previously consented to any particular use of your information, such as receiving emails or text messages. For all such requests, contact [DPO@luminad.com](mailto:DPO@luminad.com). You may also decline to share certain personal data with us, in

which case we may not be able to provide some of the features and functionality of our Website.

You have the right to object, at any time, to the processing of your personal data for direct marketing purposes.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We retain your personal data while you have an account with us and while you continue to use or visit the Website. We will retain your personal data for as long as it is reasonably necessary for the purposes set out in this Policy, considering the time period reasonably necessary to provide our services to you; exercise the choices and rights you have requested; comply with our contractual obligations; enforce our Terms of Service; and, comply with legal and regulatory requirements.

You may make changes to the personal data collected by our account registration pages as described in the [Accessing and Correcting Your Information](#) section above. We will make commercially reasonable efforts to provide you reasonable access to your personal data within one month of your access request to the contact address below. We provide this access so that you may review, make corrections, or request deletion of your personal data. If we cannot honor your request within one month, we will inform you when we will be able to provide such access. If for some reason access is denied, we will provide an explanation as to why access is denied. When technically feasible, at your request, we will provide your personal data to you or transmit it directly to another controller.

## **XVI. Contact and Opt-Out Information**

You may contact us as provided below if: (a) you have questions or comments about our Policy; (b) wish to make corrections to any personally identifiable information you have provided; (c) want to opt-out from receiving future commercial correspondence, including emails, from us or our affiliated companies; or (d) wish to withdraw your consent to sharing your personally identifiable information with others.

DPO@luminad.com

We will respond to your request and, if applicable and appropriate, make the requested change in our active databases as soon as reasonably practicable. Please note that we may not be able to fulfill certain requests while allowing you access to certain benefits and features of our Website.

If you are in the EU, then you have the right to make a complaint to your national data protection supervisory authority if you do not believe we have resolved your concern.

**XVII. Sole Statement**

This Policy as posted on this Website is the sole statement of our Policy with respect to this Website, and no summary, modification, restatement or other version thereof, or other privacy statement or policy, in any form, is valid unless we post a new or revised policy to the Website.