

PRIVACY POLICY

Last updated: 20.08.2025

Welcome! This Privacy Policy explains how **Retarro** ("we", "our", or "us") collects, uses, stores, and shares your personal data when you use our website and services ("Services").

We take your privacy seriously and do our best to handle your information in line with applicable privacy and data protection laws.

In this Policy, we'll walk you through what kinds of personal data we might collect, why we collect it, how we use it, and what rights you have in relation to your data.

By using our Services, you agree to this Policy. If you don't agree with it, please don't use the Services.

We may update this Policy from time to time. Whenever we do, we'll publish the latest version here along with the date it was revised

In certain situations, such as when we process personal data for our own business purposes (e.g. marketing, analytics, billing), Retarro acts as a data controller. In other cases - such as processing data uploaded by our Clients into our Platform - we act as a data processor under their instructions

Data Processing on Behalf of Clients

We offer our Platform as a software-as-a-service (SaaS) solution, allowing clients to upload, customize, and analyze data using our features and tools. In doing so, we may process personal data strictly on behalf of and under the instructions of our clients.

This data typically concerns our clients' business partners, customers, or end-users who engage with their websites, services, or ads. In these cases, the client acts as the data controller, and we act as the data processor.

Our relationship with the client in respect of such processing is governed by a Data Processing Agreement (DPA), which outlines our respective roles and obligations in accordance with applicable data protection laws.

1. Definitions

- a. 'Personal data' means any information relating to an identified or identifiable natural person ('data subject') or You.
- b. 'You' means the natural person (data subject) whose personal data is being processed, who accesses or uses this website, or interacts with us through our services or communication channels.

- c. 'Data Controller' means the natural or legal person, organisation, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of processing personal data.
- d. 'Data Processor' means a natural or legal person, public authority, agency, or other body which processes personal data on behalf of the Data Controller, in accordance with their instructions.
- e. 'Processing' - any operation or set of operations performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

2. Information We Collect, Purpose and Legal Basis

Personal Data We Collect	Purpose	Legal Basis
Contact Details: When you sign up for our Services, we may collect your name, company name, location (city, state, zip), email address, phone number, and similar details	To register your account, communicate with you, and provide customer support	Performance of a contract; Legitimate interest
Contact Details: email address	To provide you with marketing letters	Consent
Billing Details: If you purchase a paid Service, we may request payment information (e.g., credit card or bank details)	To verify your identity, process payments, and issue invoices	Performance of a contract; Legal obligation
Service Usage Data: Such as order details, chat or email logs, and your interactions within client-specific areas of the site.	To operate, monitor, and improve our platform and services	Legitimate interest
Automatically Collected Data: When you visit our site or use services, we may collect technical and usage data (e.g., clicks, views, preferences) via cookies and similar tools	To ensure core site functionality; Improve user experience; Analyze interactions for service improvement; Support marketing and retargeting (if applicable)	Consent (for optional cookies); Legitimate interest (for essential functionality and service performance)

Children's Data

We do not knowingly collect personal data from anyone under the age of 18. If we become aware that we have collected personal data from a person under this age, we will delete it as

soon as reasonably possible.

If you believe that we may have collected such data, please contact us at hello@retarro.com

3. How We Share Your Information

We may share your personal data with third parties in the following situations:

Service Providers and Partners:

We work with trusted vendors who support our operations (e.g., cloud hosting, analytics, customer support, marketing, security). These providers only process your data on our behalf and under strict confidentiality obligations.

Business Transfers:

If we are involved in a merger, acquisition, restructuring, or asset sale, your data may be transferred as part of that transaction.

Legal Obligations:

We may disclose your data where required to comply with laws, regulations, legal processes, or enforceable governmental requests.

Protection and Enforcement:

We may share data to protect our rights, investigate fraud, enforce our agreements, or respond to legal claims.

With Your Consent:

We may share your personal data for purposes not described in this Policy only with your explicit consent.

4. Retention of Information

We retain your information as long as necessary to meet the purposes described in this Privacy Policy unless a longer period is required by law (e.g., for tax or accounting reasons).

Once we no longer need your personal information for business purposes, we will delete or anonymize it. If deletion or anonymization isn't possible (such as when stored in backup archives), we will securely store and isolate your personal information until it can be deleted.

5. How We Protect Your Information

We do our best to keep your personal information safe from unauthorized access, changes, sharing, or destruction. However, we cannot guarantee that your data will always be completely secure.

To protect your information, we:

- Regularly check our systems for security issues.
- Update our security measures frequently.

If we detect a security issue, we may take appropriate steps to protect your data, including temporarily restricting access to our services. If you think your information is no longer secure, please let us know right away at hello@retarro.com.

6. Your Data Protection Rights

Upon receiving a written request from you or your authorised legal representative, we will assist you in exercising your rights under applicable data protection laws.

If you are EEA resident you have the following rights:

- **Right to be informed:** You have the right to be clearly informed about how we collect, process, store, and use your personal data. We provide this information in our Privacy Policy, which describes in detail what personal data we process, our lawful basis, purposes of processing, your rights, retention periods, and with whom your data may be shared.
- **Right of access:** You may request confirmation of whether we are processing your personal data, along with details of that processing.
- **Right to rectification:** You can request correction of inaccurate or incomplete personal data.
- **Right to erasure (right to be forgotten):** You may request the deletion of your personal data. However, this right applies only if:
 1. Your personal data is no longer required for the purposes for which it was collected or processed;
 2. You object to the processing, and there are no overriding legitimate reasons for us to continue processing your data;
 3. Your personal data has been processed unlawfully.
- **Right to restrict processing:** You can request that we temporarily restrict processing of your personal data if:
 4. You contest the accuracy of your personal data (processing is restricted while we verify accuracy);
 5. The processing is unlawful, but you oppose erasure and request restriction instead;
 6. We no longer need your personal data for our processing purposes, but you require it to establish, exercise, or defend legal claims;
- **Right to data portability:** You can request to receive your personal data in a structured, commonly used, and machine-readable format, allowing you to transfer your data to another controller.
- **Right to object:** You can object to the processing of your personal data when processing is based on 'public interest' or our 'legitimate interests' under Article 6(1)(e) or (f) of the UK GDPR.
- **Right not to be subject to automated decision-making:** You have the right not to be subject to decisions based solely on automated processing, including profiling, unless:
 7. The decision is necessary to enter into or perform a contract with you;
 8. The decision is authorised by law, provided adequate safeguards for your rights and freedoms are in place;
 9. The decision is based on your explicit consent.
- **Right to lodge a complaint:** You have the right to lodge a complaint with the data protection authority

Right to withdraw Your Consent: If we process your personal information based on your consent, you can withdraw that consent at any time by contacting us at hello@retarro.com. This will not affect the lawfulness of any processing carried out before you withdraw your consent, nor will it affect processing conducted on other lawful grounds.

For any questions or comments about your privacy rights, please email us at hello@retarro.com.

7. Changes to This Privacy Policy

We may revise this Privacy Policy from time to time. When we do, we will update the “Last Updated” date at the top of the page. Any changes will take effect once the updated version is published. If we make any material changes, we will notify you either through the Website or by other appropriate means. We recommend checking this page regularly to stay informed about how we handle your personal data.

8. How to Reach Us About This Policy

If you have any questions or comments regarding your privacy rights or this Policy, please email us at hello@retarro.com.