

E-mini Maverick Privacy Policy

Last updated May, 2023

E-MiniMaverick.com, including our subsidiaries and affiliates worldwide (“E-Mini Maverick”, “we”, “our” or “us”), puts great efforts in making sure that the personal data we process is safe and used properly, and that our data practices are accurately communicated to our prospects and users (“you”)

This Privacy Policy describes how we collect, store, use and disclose the following types of personal data:

Prospect data concerning our visitors, prospective affiliates and customers, who visit or engage with our websites (such as E-mini Maverick and its subdomains), blogs, community, marketplace or other similar forums, online ads and content, emails or other communications under our control (collectively, the “Sites”), or participate in events or webinars that we organize or take part in (collectively, “Prospects”).

User data concerning individuals (“Users”) who use E-Mini Maverick’s WordPress web development platform, features and tools, and/or cloud hosting solution (together with the Sites – the “Services”).

Specifically, this Privacy Policy describes our practices regarding Data Collection Data Uses

Data Location

Data Retention

Data Security

Data Sharing

Cookies and Tracking Technologies

Communications

Data Subject Rights

E-Mini Maverick Cloud

Roles and Responsibilities

Additional Information and Contact

Please read this Privacy Policy carefully and make sure that you fully understand and agree to it.

You are not legally required to provide us with any personal data, and may do so (or avoid doing so) at your own free will. If you do not wish to provide us with your personal data, or to have it processed by us or any of our Service Providers (per Section 6 below), please avoid any interaction with us or any use of our Services.

1. Data Collection

IN PLAIN ENGLISH: We collect your data when you use our Services or contact us, directly ourselves or via third-party services.

Such data may include: The data we process regarding our Prospects and Users is typically collected and generated through automatic means, directly from you, through your interaction with us or with our Services; or through third-party services, social media, analytics tools, events we organize or take part in, and other business initiatives.

Contact information: contact details and interests, as well as any needs, preferences, attributes and insights relevant to our potential engagement.

Direct interactions and communications with us: correspondence with us (e.g., for user experience, support and training purposes), as well as chats, surveys, feedbacks, calls and video recordings, transcriptions, and analyses thereof;

Site usage information: connectivity, technical and aggregated usage data, user agent, IP addresses, device data (such as type, OS, device ID, browser version, locale and language settings used), approximate geolocation, activity, communication and performance logs, session recordings, issues and bugs, and the cookies and pixels installed or utilized on your device.

We collect additional data from our Users, such as:

Account information: e-mail address, name and, when applicable, hashed password or other information used for authentication and access control;

Payment information: mailing address, tax ID number, company name (if applicable), 4 last digits of the credit card number, expiration date, credit card type, or account details at payment processing services such as PayPal (if applicable), and payment preferences. To the extent that any of the foregoing solely relates to a non-human entity, we will not regard it as personal data, and this Privacy Policy will not apply to it.

Service usage information: license key, server's software, version and IP address, MySQL version, PHP settings & version, WordPress version, WordPress debug mode, WordPress memory limit, WordPress max upload size, WordPress settings (permalink structure, multisite, language, theme, plugins), site URL, number of custom templates saved to library, number of posts using E-Mini Maverick, and number of widgets used. Please note, if you enabled the Services' usage information collection option, you can always disable it by unchecking the 'Usage Data Tracking' option in the dashboard's settings.

2. Data Uses

IN PLAIN ENGLISH - We use your data to provide you with our Services, to continually improve them, and to communicate with you.

E-Mini Maverick processes the personal data described in Section 1 for the purposes listed below, as necessary for the performance of our Services (“Performance of Contract”); to comply with our legal and contractual obligations (“Legal Obligations”); and to support our legitimate interests in maintaining, improving and advertising our Services. These include understanding how our Services are used, and how our Services, campaigns and other activities are performing; gaining insights that help us dedicate our resources and efforts more efficiently; marketing, advertising and selling our Services; providing customer service and technical support; and protecting and securing our Services, ourselves and the organizations and individuals we engage with (“Legitimate Interests”).

E-Mini Maverick operates in many countries around the world. If you reside or are using the Services in a territory governed by privacy laws under which “consent” is the only or most appropriate legal basis for processing personal data in the manners described in this Policy (in general, or specifically with respect to the types of personal data you expect or elect to be or have processed by or via the Services), your acceptance of our Terms and Conditions and this Privacy Policy linked below and will be deemed as your consent to the processing of your personal data for all purposes detailed herein. If you wish to revoke such consent, please contact us at mav@E-MiniMaverick.com.

Specifically, we use your data for the following purposes (and in reliance on the legal bases for processing noted next to them, as appropriate):

To facilitate, operate, enhance and provide our Services (Performance of Contract; Legitimate Interests);

To provide you with assistance and technical support services, to test and monitor the Services, or diagnose or fix technology problems, and to train our staff (Performance of Contract; Legitimate Interests);

To personalize our Services, including by recognizing an individual and remembering their information when they return to our Services, and to provide further localization and personalization capabilities (Performance of Contract; Legitimate Interests);

To gain a better understanding on how individuals use and interact with our Services, which content and data they have processed through our Services, and how we could improve their and others’ user experience and the value they can generate from using the Services, so we could continue improving our products, offerings and the overall performance of our Services, including through the utilization and optimization of Artificial Intelligence and Machine Learning capabilities (Legitimate Interests);

To facilitate and optimize our marketing and advertising campaigns, ad management and sales operations, and to manage and deliver advertisements for our products and Services more effectively (Legitimate Interests; Consent);

To contact you with general or personalized service-related messages, or with promotional messages, in accordance with Section 8 below, and to facilitate, sponsor and offer certain events and promotions (Performance of Contract; Legitimate Interests; Consent);

To facilitate and optimize our marketing campaigns, ad management and sales operations, and to manage and deliver advertisements for our products and services more effectively, including on other websites and applications. Such activities allow us to highlight the benefits of using our Services, and thereby increase your engagement and overall satisfaction with our Services. This includes contextual, behavioral and interests-based advertising based on your activity, preferences or other data available to us or to our business partners (Legitimate Interests; Consent);

To support and enhance our data security measures, including for the purposes of preventing and mitigating the risks of fraud, error or any illegal or prohibited activity (Performance of Contract; Legitimate Interests);

To create aggregated statistical data, inferred non-personal data, or anonymized or pseudonymized data (rendered non-personal), which we or our business partners may use to provide and improve our respective services, or for any other purpose (Legitimate Interests); and

To comply with our legal, regulatory, compliance and contractual obligations (Legal Obligations).

3. Data Location

IN PLAIN ENGLISH - We and our Service Providers will store your data in different locations worldwide.

We and our authorized Service Providers maintain, store and process personal data in the various locations we operate around the globe, including in Israel, the EU and the US, as reasonably necessary for the proper performance and delivery of our Services, or as may be required by law.

While privacy laws may vary between jurisdictions, E-Mini Maverick, its affiliates and Service Providers are each committed to protect personal data in accordance with this Privacy Policy, customary industry standards, and such appropriate lawful mechanisms and contractual terms requiring adequate data protection, regardless of any lesser legal requirements that may apply in the jurisdiction to which such data may be transferred.

4. Data Retention

IN PLAIN ENGLISH - We retain your personal data for as long as necessary to provide you with our Services; we do not retain your payment information.

We retain your personal data for as long as it is reasonably necessary to provide you with our Services and offerings and to maintain and expand our relationship; to comply with our legal and contractual obligations; or to protect ourselves from any potential disputes (e.g. as required by laws applicable to log-keeping, records and bookkeeping, and in order to have proof and evidence concerning our relationship, should any legal issues arise following your discontinuance of use), all in accordance with applicable laws and regulations.

Please note that except as required by applicable law or our specific agreements with you, we will not be obligated to retain your personal data for any particular period, and we are free to securely delete it or

restrict access to it for any reason and at any time, with or without notice to you. If you have any questions about our data retention policy, please contact us by e-mail at mav@E-MiniMaverick.com.

Please also note that we do not retain your payment information, it is transferred directly to the relevant Service Provider (as per Section 6 below). We only retain a token of such payment information (which cannot be used to reidentify it) and the chosen payment method, as it is required for your continuous payment of our Services subscriptions.

5. Data Security

IN PLAIN ENGLISH - We will do our best to make sure your data is secured.

We and our Service Providers implement systems, applications and procedures to secure your personal data, to minimize the risks of theft, damage, loss of information, or unauthorized access or use of information. These measures provide sound industry-standard security, however, although we make efforts to protect your privacy and data, we cannot and do not guarantee the absolute protection and security of any personal data stored with us or with any third-parties.

6. Data Sharing

IN PLAIN ENGLISH - We may share your data for different reasons, mainly in order to provide you with our Services, or if required by law.

Legal Compliance: in exceptional circumstances, we may disclose or allow government and law enforcement officials access to your personal data, in response to a subpoena, search warrant or court order (or similar requirement), or in compliance with applicable laws and regulations, with or without notice to you. Such disclosure or access may occur if we believe in good faith that: (a) we are legally compelled to do so; (b) disclosure is appropriate in connection with efforts to investigate, prevent, or take action regarding actual or suspected illegal activity, fraud, or other wrongdoing; or (c) such disclosure is required to protect our legitimate business interests, including the security or integrity of our products and Services.

Service Providers: we engage selected third-party companies and individuals to perform services complementary to our own. Such Service Providers include hosting and server co-location services, communications and content delivery networks (CDNs), internet service providers, operating systems and platform, data analytics services, marketing and advertising services, data and cyber security services, fraud detection and prevention services, billing and payment processing services, web analytics, e-mail and SMS distribution and monitoring services, session or activity recording services, remote access services, performance measurement, data optimization services, social and advertising networks, content providers, support and customer relation management systems; and our business, legal, financial and compliance advisors (collectively, "Service Providers"). These Service Providers may have access to your personal data, depending on each of their specific roles and purposes in facilitating, supporting and enhancing our Services, and may only use it for such purposes.

As part of providing the Services our affiliates, agents, contractors, representatives, trusted business partners, and third-party service providers (including without limitation, the following entities) may have access to your personal data: We use Google Ads, Facebook Ads, Twitter Ads, Microsoft Ads, TikTok and

LinkedIn to reach our target audience with relevant ads. We use the data to track sales and other business goals, all the data is being masked, and the company can't identify any action from a specific customer or user. We use Cloud Flare to accelerate our web pages. We use Facebook, Messenger and Many chat to communicate with our users; each interaction is logged in Facebook Messenger. We use third party software to send promotional and support communications to our users. We use Google Analytics to analyze marketing goals and to integrate different data sources together. We use Pay Pal, and Stripe for our payment processing and accounting. We use Hotjar in order to better understand your needs and optimize these services and experience. We require the foregoing parties to process such information in compliance with this Privacy Policy and subject to security and other appropriate confidentiality safeguards. If you used our services to contact a third-party, such as in our marketplace, then we will provide the information you filled out in the form to said third-party.

Third-Party Websites and Services: our Services may include links to third-party websites, and integrations with third-party services. Such websites and third-party services, and any information you process, submit, transmit or otherwise use with such websites and third-party services, are beyond the scope of E-Mini Maverick's Terms and Conditions and Privacy Policy linked below and will therefore be governed by such third-party's terms and privacy practices and policies, and not by this Privacy Policy. We encourage you to carefully read the terms and privacy policies of such websites and third-party services.

Protecting Rights and Safety: we may share personal data with others if we believe in good faith that this will help protect the rights, property or personal safety of E-Mini Maverick, our Users, our Prospects, or any members of the general public.

E-Mini Maverick Subsidiaries and Affiliated Companies; Change of Control: we may share personal data internally within our group, for the purposes described in this Privacy Policy. In addition, should E-Mini Maverick or any of its subsidiaries or affiliates undergo any change in control or ownership, including by means of merger, acquisition or purchase of substantially all or part of its assets, or will be considered or found eligible for a governmental grant and/or a potential investment, personal data may be shared with the parties involved in such an event. If we believe that such event might materially affect your personal data then stored with us, we will notify you of this event and the choices you may have via e-mail or prominent notice on our Services.

Additional Sharing: we may share your personal data in additional manners, pursuant to your request or explicit approval, or if we are legally obligated to do so, or if we have successfully rendered such data non-personal, non-identifiable and anonymous. We may transfer, share or otherwise use non-personal and non-identifiable data at our sole discretion and without the need for further approval.

7. Cookies and Tracking Technologies

IN PLAIN ENGLISH - We use cookies to provide and improve our Services.

E-Mini Maverick and our Service Providers use cookies and other technologies for performance, tracking, analytics, personalization purposes and in order to provide you with a better experience. We may share non-identifiable/aggregated extracts of such information with our partners for our legitimate business purposes.

Cookies: cookies are small text files that are stored through the browser on your computer or mobile device (for example, Google Chrome or Safari) when you visit a website. Some cookies are removed when you close your browser session – these are the “session cookies”. Some last for longer periods and are called “persistent cookies”. We use both types of cookies to facilitate the use of the Services’ features and tools. Whilst we do not change our practices in response to a “Do Not Track” signal in the HTTP header from a browser or mobile application, you can manage your cookies preferences, including whether or not to accept them and how to remove them, through your browser settings. Please bear in mind that disabling cookies may complicate or even prevent you from using the Services.

Google Analytics: we use Google Analytics to collect information about the use of our Services. Google Analytics collects information such as how often you visit the Services, which pages you visited when doing so, and which other sites they used prior to coming to our Services. We do not merge the information collected through the use of Google Analytics with personally identifiable data. Google’s ability to use and share information collected by Google Analytics about your visits to and use of the Services is restricted by the Google Analytics Terms of Service and the Google Privacy Policy about how Google collects and processes data specifically in connection with Google Analytics on their website. Further information about your option to opt-out of these analytics services is available by email.

To learn more about our cookies practices, please visit our cookie policy.

8. Communications

IN PLAIN ENGLISH - We may contact you with service and promotional communications.

We engage in service and promotional communications, through social media, e-mail, phone, SMS and notifications.

Service Communications: we may contact you with important information regarding our Services. For example, we may send you notifications (through any of the means available to us) of changes or updates to our Services (such as billing issues, login attempts or password reset instructions, alerts and notifications concerning anomalies detected by our Services, etc.). You can control your communications and notifications in accordance with the instructions included in the communications sent to you. Please note that you will not be able to opt-out of receiving certain service communications which are integral to your use (like password resets or billing notices payment issues, login attempts or password reset instructions, etc.).

Notifications and Promotional Communications: we may also notify you about new features, additional offerings, events, webinars, special opportunities or any other information we think you will find valuable. We may provide such notices through any of the contact means available to us (e.g., SMS, phone, mobile or e-mail), through the Services, or through our marketing campaigns on any other sites or platforms. In order to control your notifications settings please follow the instructions included in the promotional communications sent to you. If you do not wish to receive such communication, you may also notify us by sending an e-mail to: mav@E-MiniMaverick.com.

9. Data Subject Rights

IN PLAIN ENGLISH - You may exercise your rights concerning your personal data, by contacting us or editing your user profile.

Individuals have rights concerning their personal data. If you wish to exercise your privacy rights under any applicable law, including the EU General Data Protection Regulation (GDPR), or the CCPA, such as – to the extent applicable – the right to know/request access (specific pieces of personal data collected; categories of personal data collected; categories of sources from whom the personal data was collected; purpose of collecting personal data; categories of third parties with whom we have shared personal data), rectification or erasure of your personal data held with E-Mini Maverick, please contact us by email. If you wish to exercise your right to restrict or object to such personal data’s processing, to direct us not to sell your personal data to third parties now or in the future, or to port such personal data, or the right to equal services and prices (e.g. freedom from discrimination) (each to the extent available to you under the laws which apply to you) – please contact us by e-mail. Please be advised that deleting your personal data stored with E-Mini Maverick will adversely affect your use of our Services.

Please note that such rights are not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal data that we hold about you. In the event that we cannot accommodate your request, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

Please also note that we may require additional information, including certain personal data, in order to authenticate and process your request. Such additional information may be then retained by us for legal purposes (e.g., as proof of the identity of the person submitting the request), in accordance with Section 4 above. We may redact from the data which we will make available to you, any personal data related to others.

10. E-Mini Maverick Cloud

IN PLAIN ENGLISH - We may process personal data on our Cloud Users’ behalf, if you are their visitor or user, please contact them directly with any requests.

With respect to our cloud offering, we may store personal data of visitors and users of our Users, who are hosting their website on E-Mini Maverick (“Cloud Users”).

If you are a visitor or user of our Cloud Users’ website, and you would like to make any requests or queries regarding data we process on their behalf, please contact them directly. For example, if you are a visitor or user of our Cloud User and you wish to access, correct, or delete data processed by E-Mini Maverick on their behalf, please direct your request to the relevant Cloud User (who is the “data controller” of such data – per Section 11 below). Note that if you do contact us, we may share your communications with the relevant Cloud User.

We recommend our Cloud Users to provide their visitors and users with adequate notice (for example via a privacy policy on their website), including sufficient reference to the processing of such data by us, and any other information necessary to comply with applicable laws. If you are a visitor or user of our Cloud Users’ website, we recommend reading such privacy policy carefully and making sure that you fully understand and agree to it. Please note that such Cloud Users’ websites are not governed by this Privacy Policy.

11. Roles and Responsibilities

IN PLAIN ENGLISH - We are the controllers of our Prospects and Users data; we are the processors of visitors and users' data processed on our Cloud Users' behalf.

Certain data protection laws and regulations, such as the GDPR or the CCPA typically distinguish between two main roles for parties processing personal data: the "data controller" (or under the CCPA, "business"), who determines the purposes and means of processing; and the "data processor" (or under the CCPA, "service provider"), who processes the data on behalf of the data controller. Below we explain how these roles apply to our Services, to the extent that such laws and regulations apply.

E-Mini Maverick is the "data controller" of its Prospects and Users data. With respect to such data, we assume the responsibilities of data controller (solely to the extent applicable under law), as set forth in this Privacy Policy. In such instances, our Service Providers processing such data will assume the role of "data processor".

12. Additional Information and Contact Details

External Links: while our Services may contain links to other websites or services, we are not responsible for their privacy practices. We encourage you to pay attention when you leave our Services for the website or application of such third-parties, and to read the privacy policies of each and every website and service you visit. This Privacy Policy applies only to our Services. **Updates and Amendments:** we may update and amend this Privacy Policy from time to time by posting an amended version on our Services. The amended version will be effective as of the date it is published. We will provide prior notice if we believe any substantial changes are involved via any of the communication means available to us or via Services. After such notice period, all amendments shall be deemed accepted by you.

Our Services are not designed to attract children under the age of 18: we do not knowingly collect personal data from children and do not wish to do so. If we learn that a person under the age of 18 is using the Services, we will attempt to prohibit and block such use and will make our best efforts to promptly delete any personal data stored with us with regard to such child. If you believe that we might have any such data, please contact us by e-mail at mav@E-MiniMaverick.com.

California Requirements: This Privacy Policy describes the categories of personal information we may collect and the sources of such information (in Section 1 above), and our retention (Section 4) and deletion (Section 9) practices. We also included information about how we may process your information (in Sections 2 through 8), which includes for "business purposes" under the California Consumer Privacy Act (CCPA). We do not sell your personal information for the intents and purposes of CCPA. We may share personal data with third parties or allow them to collect personal data from our Services as described in Section 6 above, if those third parties are authorized Service Providers or business partners who have agreed to our contractual limitations as to their retention, use, and disclosure of such personal data, or if you integrate the services of third parties with our Services, or direct us to disclose your personal data to third parties.

If you have any questions or would like to exercise your rights under the CCPA, you can contact mav@E-MiniMaverick.com. **Questions, concerns or complaints:** if you have any comments or questions regarding our Privacy Policy, or if you have any concerns regarding your personal data held with us, or if you wish to make a complaint about how your personal data is being processed by E-Mini Maverick, you can contact us at mav@E-MiniMaverick.com.