

PRIVACY POLICY

Your privacy is important to us.

We don't ask for your personal information unless we truly need it.

We don't share your personal information with third-parties, except where required by law.

It is Trufan Inc.'s (d.b.a Surf) policy to respect your privacy regarding any information we may collect from you through this Website, or the Trufan (d.b.a Surf) fan engagement services (the "Services").

By using or accessing our Website or the Services in any manner, you acknowledge that you accept the practices and policies described in this Privacy Policy, and you hereby agree that we may collect, use, and share your information as described by this Policy. If you do not agree with our policies and practices, do not to use our Website or our Services.

What does this Privacy Policy Cover?

This Privacy Policy applies to information we collect:

- In email, text and other electronic messages between you and us.
- Through the Website and Services (including registration and contact forms, as well as usage data)

This Privacy Policy covers our treatment of personally identifiable information. This is information which may be connected to you specifically as the individual to whom the information relates. Such information may include name, mailing address, email address, telephone number, or any other information defined as personally identifiable information (or similar term) by applicable laws (collectively, "Personal Information"). Personal Information does not include your personally identifiable information that has been deidentified, pseudonymized, anonymized, aggregated and/or otherwise processed so as to be unidentifiable (i) in such a way that the data can no longer be attributed to a specific individual, or (ii) in such a way that the data can no longer be attributed to a specific individual (by reasonable means) without the use of additional information, and where such additional information is kept separate and under adequate security to prevent unauthorized re-identification of a specific individual such that one could not, using reasonable efforts, link such information back to a specific individual (the foregoing being referred to as "De-Identified Personal Information").

Information We Collect About You and How We Collect It

We collect several types of information from and about users, including Personal Information that is about you but does not identify you, such as, time and date of visits to our Website, etc.; and/or, about your internet connection, the equipment you use to access our Website and usage details.

We collect this information:

- Directly from you when you provide it to us. When you sign up for the Services, you provide us with information such as your name and email address. We may also collect information from your public social media accounts.
- Automatically as you navigate through the Website or use the Services. Information collected automatically may include usage details, IP addresses and information collected through cookies, web beacons and other tracking technologies.

The information we collect on or through our Website may include:

- 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 or purchasing our services, posting material or requesting further services. We may also ask you for information when you report a problem with our Website or the Service.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Details of your activity on the Website or Service.
- Details of your visits to our Website, including, but not limited to, traffic data, geolocation data, logs and other communication data and the resources that you access and use on the Website
- Information about your computer and internet connection, including your IP address, operating system and browser type.

How We Use Your Information

We will use the Personal Information you provide us only in accordance with this Privacy Policy, and applicable laws. We will use this information to:

- Operate, maintain, and provide to you the features and functionality of the Service.
- Communicate with you about the Service, including to provide you with notices about your account, including expiration and renewal notices.
- Improve the Service or our other offerings.
- Present our Website and its contents to you.
- Provide you with information, products or services that you request from us.
- Fulfill any other purpose for which you provide it.
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- Notify you about changes to our Website, our policies, terms or any products or services we offer or provide through it.
- Allow you to participate in interactive features on our Website.

By providing us your email address you consent to our using that email address to send you Website and/or Service-related notices, including any notices required by law, in lieu of communication by postal mail. You also agree that we may send you notifications of activity on our Website to the email address

you give us, in accordance with any applicable privacy settings. We may use your email address to send you other messages, such as newsletters, changes to features of our Website, or other information. If you do not want to receive such email messages, you may opt out at our “unsubscribe page” at [URL].

We use cookies, clear gifs, and log file information to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the site; (b) provide custom, personalized content and information; (c) monitor the effectiveness of our Service; (d) monitor aggregate metrics such as total number of visitors, traffic, and demographic patterns; (e) diagnose or fix technology problems reported by our users or engineers that are associated with certain IP addresses; (f) help you efficiently access your information after you sign in; (h) track User Content and users to the extent necessary to comply as a service provider with the Digital Millennium Copyright Act; and (i) enhance our Website security.

Retention of Your Information

Following termination or deactivation of your account, we may retain your account and registration information. Following termination or deactivation of your account, we may retain your Personal Information and other data, but will maintain it as confidential according to this Privacy Policy and as required by applicable law. We have the right to delete all of your Personal Information and other data after termination of your account without notice to you.

How We Share Your Information

We will never rent or sell your Personal Information to others. We may share your Personal Information with third parties for the purpose of providing or improving the Services. If we do this, such third parties’ use of your Personal Information will be bound by obligations of confidentiality. We may store Personal Information in locations outside our direct control (for instance, on servers or databases located or co-located with hosting providers).

Except as otherwise described in this Privacy Policy, we will not disclose Personal Information to any third party unless required to do so by law, court order, legal process, or subpoena, including to respond to any government or regulatory request, or if we believe that such action is necessary to (a) conform to the law, comply with legal process served on us or our affiliates or partners, or investigate, prevent, or take action regarding suspected or actual illegal activities; and (b) to enforce our terms of use or any agreement with you, take precautions against liability, to investigate and defend ourselves against any third-party claims or allegations, to assist government enforcement agencies, or to protect the security or integrity of our site.

We may share De-Identified Personal Information (such as anonymous usage data, referring/exit pages and URLs, platform types, number of clicks, etc.) with interested third parties to help them understand the usage patterns for certain Services.

Your Consent to Our Disclosure/Assignment of Your Personal Information

You consent to our disclosure of your Personal Information and other information to a potential buyer or other successor for the purpose of considering a merger, divestiture, restructuring, reorganization, dissolution, or sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which Personal Information held by us about our Website users is among the assets transferred. You agree to and do hereby consent to our assignment, conveyance, or transfer (whether by contract, merger or operation of law) of rights to your Personal Information and other information, with or without notice to you and without your further consent.

Security

We take security seriously, and take robust commercially reasonable measures to protect your personal information from loss or theft, as well as unauthorized access, disclosure, copying, use or modification. However, we advise that no computer system or network can ever be 100% secure, and therefore we cannot guarantee the absolute security of your personal information. Any transmission of Personal Information is at your own risk. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time. We are not responsible for circumvention of any privacy settings or security measures contained on the Website or used with our Services.

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 the Website or Services, you are responsible for keeping this password confidential. You should not share your password with anyone. You must prevent unauthorized access to your account and Personal Information by selecting and protecting your password appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account. The information you share in public areas may be viewed by other users.

Notices; Opting Out

All notices – whether required by law or otherwise – will be sent to the email address used to register for the Services. You consent to receive such notices by email, and not by post. If you choose not to receive these emails by “opting out”, you acknowledge that you may not receive important legal notices, and hereby waive any claims you may have against Trufan (d.b.a Surf) on account of not receiving such notices.

Individuals under the Age of 18

We do not knowingly collect, solicit or maintain Personal Information from anyone under the age of 18, or knowingly allow such persons to register for our Services, with the exception of children 13 or older who have permission from a parent or guardian who has entered into an agreement with Trufan (d.b.a Surf) on the child's behalf. If you are under 18, please do not send any Personal Information about yourself (such as your name, address, telephone number, or email address) to us. No one under age 18 is allowed to provide any Personal Information to or on the Services. In the event that we learn that we have collected Personal Information from a child under age 18 without verification of parental consent, we will use commercially reasonable efforts to delete that information from our database. Please contact us at support@joinsurf.com if you have any concerns.

Changes to Our Privacy Policy

We are constantly working to improve our Services, so we may need to change this Privacy Policy from time to time as well, but we will alert you to changes by placing a notice on our Website or as part of the Services, by sending you an email, and/or by some other means. Please note that if you've opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is collected.

If you have any questions about this Privacy Policy, the practices of this site, or your dealings with this website, please contact us at info@joinsurf.com, or send mail to:

TRUFAN (d.b.a Surf)

ATTN: PRIVACY DEPARTMENT

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