



All Our Minds Ltd

Privacy and Cookies Policy (EU)

Version number 1.0 Effective from 18/11/2024

1. Who is responsible for the data processing?

1.1 We are All Our Minds Limited, Vision Exchange Building, Triq it-Territorjals, Zone 1, Central Business District, Birkirkara, CBD 1070, Malta. For privacy queries, you can contact us at info@allourminds.com. We are responsible for the data processing on our website at allourminds.com.

2. What's the purpose of this policy?

2.1 It tells you what personal data from users of our website and of our software are collected, for what purposes they are processed, and to inform you of your rights.

2.2 Generally, the policy covers only information provided to us. If you give personal information to others, such as payment providers or other websites, please check their privacy policies.

3. Might the policy change?

3.1 Yes. We will give you notice of the new version by posting it on our service and communicating it otherwise if appropriate.

4. What information is automatically collected when visiting the website?

4.1 Every time someone visits our website, we automatically process the following information, that is stored temporarily in a logfile:

- Name of the web page visited/file retrieved
- Date and time the page is viewed
- Report of successful retrieval
- The IP address
- browser type, browser version, browser language and the operating system used.

Logfiles are deleted after 30 days. The legal basis for the processing is Article 6(1), s. 1 lit. f GDPR. The legitimate interest in the processing lies in the technical enablement of the call of the internet presence, the optimized presentation of the contents at the user and the future further improvement/optimization of the internet offer. Furthermore, the IP address is stored and processed to detect, prevent, and investigate security incidents, such as unauthorized access, hacking attempts, or Distributed Denial of Service (DDoS) attacks, and fraud prevention.



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Right to object:

In the case of data processing based on Art. 6(1) s. 1 lit. f GDPR, you have the right to object, without prejudice to further rights.

5. What about cookies?

5.1 Cookies used on our website may originate either from ourselves or from third-party providers whose tools we have integrated into our Internet offering, and serve different purposes. A cookie is an identifier (a small file of letters and numbers) that is sent to your web browser. Cookies are widely used to make websites work, or work more efficiently, as well as to provide information to the website owner or others. Some are temporary "session" cookies that remain in the cookie file of your browser only until your browser is closed, whereas persistent cookies stay for longer (depending on the lifetime of the specific cookie). We have divided them into essential and non-essential cookies.

5.2 Essential cookies are strictly necessary for the basic functionality of our website, enabling core features such as navigation, security, and access to protected areas. Non-essential cookies, while not crucial for the website's operation, are used to enhance your browsing experience, provide social media features, analyse our traffic and similar.

5.3 The use of the essential cookies is based on a legitimate interest pursuant to Art. 6(1) s. 1 lit. f GDPR. The legitimate interest in the processing lies in enabling the proper presentation and use of the functionalities of our website. All other cookies are only used based on your prior consent.

Right to object:

In the case of data processing based on Art. 6(1) s. 1 lit. f GDPR, you have the right to object, without prejudice to further rights.

5.4 When our website is called up by a browser for the first time and after the cookies have been deleted from the browser, a banner with a consent manager is displayed that contains information about the individual cookies and allows the user to make settings regarding the use of cookies. Within this tool, you can agree to the use of cookies regarding entire categories as a whole or individual cookies within the categories by ticking the respective boxes. This does not apply to necessary cookies,



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the use of which is not based on your consent, but on a legitimate interest (see above).

5.5 Giving consent is voluntary and the consent can be revoked at any time by changing the selection accordingly with effect for the future. For this purpose, you can change the cookie settings at any time via a link in the footer, which is located on every page of our website, and revoke the consent by deactivating the respective cookie. A revocation has no influence on the legality of the processing carried out on the basis of the consent until the revocation.

5.6 We ourselves may place the following types of cookies:

Type of cookie	Purpose
Logged-in status	Assess whether you are logged in to our site
"Remember me"	Remember you and speed up your login when you return to our site
Authentication	Identify and authenticate you to help you move easily through the site
Shopping cart	Remember contents of your cart and related preferences
Affiliate	Track whether you have visited us from websites affiliated with us so we can pay affiliates and assess the effectiveness of the affiliate links
Security	Provide security-related features to protect our site, for example to help stop fraudulent logins
Cookie notice	Store your response to our cookie notice

5.7 For further information on cookies, including how to use your browser to block them and how to delete existing cookies, visit: www.allaboutcookies.org. Our site's functionality will be limited if you configure your browser to reject cookies.

6. What third-party tools are used that potentially store and read cookies or store and read data from my device?





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6.1 We use **Google Analytics** on our website, a web analytics service, which is, in the EU, provided Google Limited, Gordon House, Barrow Street, Dublin 4, Ireland. On the basis of, among other things, a contract for order processing with us, certain user and usage information is collected by Google, compiled into pseudonymized usage profiles and stored in cookies (see above). This includes, for example, information about the browser type/version used, the operating system used, the screen resolution, referrer URL (the previously visited page), anonymized IP address of the accessing computer, time of server request, downloaded files, videos viewed, advertising banners clicked, orders placed, click paths, frequency of page views, entry and exit pages, time spent on individual pages, etc.

The information collected is used to statistically evaluate the use of our website in aggregated form, to compile reports on website activity and the behaviour of users on our website and to provide us with other analysis services related to the website and its use, e.g. on the effect of online marketing campaigns. This serves to design and continuously optimize our website in line with requirements. The IP address transmitted by your browser as part of Google Analytics is not merged with other data from Google.

We have activated an IP anonymization tool, which means that your IP address is truncated beforehand by Google Analytics and thus transmitted anonymously within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. As a processor pursuant to Art. 28 GDPR, Google is the recipient of the personal data. Google Ireland shares data with Google USA and other Google entities to provide and enhance its services.

As part of Google Analytics, we use Google's "**Advertising Features**" suite. Google Analytics' Advertising Features collect a wide range of data, including demographic, interest, behavioural, advertising interaction, conversion, geolocation, device, and traffic source data. This data helps businesses gain comprehensive insights into their audience and the effectiveness of their marketing efforts, enabling more informed decisions and optimized advertising strategies. which provides detailed insights into user behaviour, demographic data, and the effectiveness of advertising efforts.



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The legal basis for data processing by means of Google Analytics is your consent pursuant to Art. 6(1) s. 1 lit. a GDPR, which you can give via the cookie consent tool described above. The granting of consent is voluntary and can be revoked via the same tool at any time with effect for the future. For this purpose, you can change the cookie settings at any time via a link in the footer located on every page of our website and revoke the consent by deactivating the respective cookie.

In addition, if you do not want your data to be processed in Google Analytics, you can install a browser add-on to disable Google Analytics, which you can download and install here:

<https://tools.google.com/dlpage/gaoptout/>.

More information:

- Google's [overview of GA data practices and safeguarding](#)
- how to specifically [opt out from GA cookies](#)
- Google's [use of its partners' data](#)

7. What personal data is processed when purchasing a product or downloading a trial or an NFR (Not for Resale) version?

7.1 To purchase a product, you add the item to your basket and proceed to payment via PayPal.

7.2 After completing the payment process, we create a user account for you and store the aforesaid information, along with the licence code for the products you purchased in your account. You will receive a confirmation email and are invited to click a link to choose a password for future logins. Depending on the tax requirements, we may ask you to indicate your country of origin.

7.3 The payment service PayPal is operated by PayPal Holdings Inc., PayPal Holdings, Inc., 2211 North First Street, San Jose, California 95131, USA. When clicking the PayPal button, you are then taken to PayPal website to complete the transaction. Your payment details, including credit card or bank account information, are securely processed by PayPal and not stored on our servers. The information we receive from PayPal includes the transaction ID, the payment amount, your email address and your



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postal address. This data is used solely for order fulfilment as well as for the later activation of the software. PayPal may collect additional data as described in their [Privacy Policy](#). We recommend reviewing their policy for more details on data handling and protection. Paypal uses cookies, partly necessary/essential cookies, partly performance, functionality and/or marketing cookies. You can manage your cookie preferences through PayPal's [cookie settings page](#).

- 7.4 For licensing purposes, we will store to your account and process the name of the product, the license ID, time stamps (purchase and activation), your IP addresses (purchase and activation), your system ID and information of your device.
- 7.5 The aforementioned data processing is based on Art. 6(1) s. 1 lit. b GDPR, because it is necessary for the conclusion and performance of the contract.
- 7.6 Trial versions and NFR versions can be downloaded without the need to create an account.

8. What personal data is processed when using the software?

- 8.1 To use our software, you will first need to activate it by entering the email address used for your user account and alternatively your password or the software activation code to verify that you are entitled to use the software. The time of activation will be saved.
- 8.2 Everytime you start the app, the software will connect to our servers to validate the license.
- 8.3 The aforementioned data processing is based on on Art. 6(1) s. 1 lit. b GDPR to enable the use of the software.

9. What about marketing emails?

- 9.1 You can subscribe to our newsletter on our website. To do so, you must provide your email address and consent to the use of this email address for future newsletter mailings. The email address that you provide will be used exclusively to send the newsletters and, if you chose so, to unsubscribe from the newsletter.



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- 9.2 We use a double opt-in procedure to ensure you wish to receive our communications. When you sign up, we will send a confirmation email to the email address you provided and will ask you for confirmation. The confirmation link will be active for a limited duration.
- 9.3 Our newsletter email addresses are managed and the newsletters are sent by use using the service provider MailerLite, 548 Market St, PMB 98174, San Francisco, CA 94104-5401, United States on the basis of a controller-processor agreement. Data protection information of this provider can be read here: <https://www.mailerlite.com/legal/data-processing-agreement>.
- 9.4 The use of your email address for marketing purposes after subscribing to our newsletter is based on your prior consent (legal basis: Art. 6(1) s. 1 lit. a GDPR). This consent is voluntary and can be revoked at any time with effect for the future: Each newsletter contains a link at the end that you can use to unsubscribe from the list and thereby revoke your consent. A revocation has no influence on the legality of the processing carried out on the basis of the consent until the revocation.
- 9.5 Independent from subscribing to our newsletters, we may send out marketing emails relating to our products to you if you are a registered customer (i. e. you have purchased one or more of our products or downloaded any free product from us). We may do so based on a legitimate interest according to Art. 6(1) s. 1 lit. f GDPR. The legitimate interest lies in our need and desire to promote our products and services to sustain business growth and maintain customer relationships.

Right to object (Opt-Out):

You can object to this use of your email address by clicking the unsubscribe link, which is included in all of our marketing emails. Once done, you will not receive any marketing emails from us in future. Please note that this does not apply to non-marketing emails that we may send based on other legal bases.

10. What data is processed when participating in a beta program?

- 10.1 We may offer beta versions of our software which are available to a selected group of users (private beta) or the general public (public beta). Participating in such beta program requires sign-up by email and consent



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to use your email address for sending you information about the beta program, our product(s) and service(s).

- 10.2 We use a double opt-in procedure to ensure you wish to receive our communications. When you sign up, we will send a confirmation email to the email address you provided and will ask you for confirmation. If you do not confirm within 24 hours, your email address will not be added to the beta program.
- 10.3 The use of your email address for a beta program is based on your prior consent (legal basis: Art. 6(1) s. 1 lit. a GDPR). This consent is voluntary and can be revoked at any time with effect for the future: Each newsletter contains a link at the end that you can use to unsubscribe from the list and thereby revoke your consent. A revocation has no influence on the legality of the processing carried out on the basis of the consent until the revocation. Please note that it is not possible to participate in a beta program without giving consent to use your email address for the above purposes.
- 10.4 Participating in a beta program may require signing a non-disclosure agreement ("NDA"). Any personal data contained in such NDA will be processed based on Art. 6(1) s. 1 lit. b GDPR.
- 10.5 Any communication you may send to us in the course of the beta program (particularly feedback) will be processed based on Art. 6(1) s. 1 lit. f GDPR. The legitimate interest lies using the information for the further development of our products.

Right to object (Opt-Out):

You can object to this use of your email address by clicking the unsubscribe link, which is included in all of our marketing emails. Once done, you will not receive any marketing emails from us in future. Please note that this does not apply to non-marketing emails that we may send based on other legal bases.

11. How long do we keep personal information?

- 11.1 We will generally hold your information for our default standard retention period of six years after the end of our contract with you, but we may delete it earlier/later to the extent legally required or admitted.



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12. To whom do we send or make available your personal information?

- 12.1 To other people who supply us with services, e.g., website hosting and management, payment, customer service, email distribution, e-commerce, online advertising, analytics, social media, etc.
- 12.2 To regulators, the police and other law enforcement or official authorities to help deal with fraud and abuse and/or comply with legal requirements and/or to protect us or others, if legally required or admissible.
- 12.3 To insurers and professional advisers in connection with our insurance cover or to deal with legal claims.

13. Do we send your information outside the EU?

- 13.1 Your personal information (e.g., name, username, contact details, IP address, browsing information) may be transferred to our office and service partners in the UK. The UK has been recognized by the European Commission as providing an adequate level of data protection for data transfers from the EU.
- 13.2 Some web tools we are using are provided by businesses located outside of the EU/EEA, and such tools may transfer certain data to these companies and other third parties. Such third countries may not guarantee an adequate level of data protection, i.e., no data protection to the same extent as the EU member states guarantee under EU law. The rights guaranteed under EU law may only be guaranteed there to a limited extent. We must particularly point out that U.S. authorities can access data processed by a U.S. company without you being informed of this access and without you being able to assert rights in this regard to the same extent and effectiveness as is possible within the EU. The US providers of the web tools used by us, however, are self-certified members of the EU-US Data Privacy Framework.

14. Links to Social Media Platforms

Our website may contain links to social media platforms, such as Instagram, TikTok, Facebook and X. We do not use any social media plugins or embedded features that automatically transmit your data to these platforms. When you interact with these links, please be aware that you may be redirected to the respective social media site, where their own



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privacy policies and practices will apply. We recommend reviewing the privacy policies of these platforms, as we do not control and are not responsible for their content, privacy practices, or the handling of your personal data once you leave our site. By using these links, you acknowledge and accept that any personal data shared through social media interactions is subject to the policies of the respective platforms.

15. What rights do you have?

- 15.1 You can withdraw a declaration of consent under data protection law that you have given, at any time with effect for the future. Details on how to do this can be found above in the specific descriptions of the declarations of consent.
- 15.2 You have the right to request confirmation from us as to whether we are processing personal data relating to you, unless that right is excluded by law. If you are entitled to this right, you also have a right to information regarding this personal data to the extent stipulated under the law (Article 15 GDPR). You also have the right to request information about whether the personal data concerning you is transferred to a third country or to an international organisation. In this context, you can request to be informed about the appropriate safeguards set out in Article 46 GDPR in connection with the transfer.
- 15.3 You also have the right to request that inaccurate personal data concerning you be rectified and where applicable – taking into account the purposes of the processing – incomplete personal data be completed, including by means of providing a supplementary statement (Article 16 GDPR).
- 15.4 Moreover, in the cases described in Article 17(1) lit. a to f GDPR, you have a right to request that personal data be erased, provided no exception under Article 17(3) GDPR applies, as well as a right to restriction of processing in the cases described in Article 18(1) GDPR.
- 15.5 There is also a right to have data portability ensured in the cases laid out in Article 20(1) GDPR.



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15.6 You have the right to lodge a complaint with the competent supervisory authority, if you are of the opinion that the processing of personal data relating to you infringes the GDPR.

15.7 To the extent the processing of data is based on Article 6(1), s. 1 lit. e GDPR, you have the right to lodge an objection at any time, for reasons related to your particular situation, to the processing of personal data concerning you. We will then no longer process the respective personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or the processing is for the establishment, exercise, or defence of legal claims.

16. Final notes

16.1 No automated decision-making or profiling takes place.

16.2 There is no statutory or contractual obligation to provide us with personal data for you to be able to visit to our website.



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