

# Privacy Policy - SC Altiora Development SRL

Last updated: January 10, 2026

## 1. Introduction

Thank you for your interest in our company, products, and/or services. When you enter into a relationship of any kind with us, you entrust us with your information. This information presented in this document (hereinafter referred to as the "Privacy Policy") is important. We recommend that you read it carefully.

The purpose of this Privacy Policy is to explain what data we process (collect, use, share), why we process it, how we process it, your rights under applicable privacy laws, and how you can exercise these rights. In collecting this information, we act as a data controller and, by law, we are required to provide you with this information.

The protection and confidentiality of personal data is very important to us. Being fully aware that personal information belongs to you, we do our best to store it securely and process it carefully. We do not provide information to third parties without informing you in accordance with legal provisions. We do not make exclusively automated decisions with significant impact on you.

## 2. Definitions

For the purposes of this Privacy Policy:

**Account** means a unique account created for you to access our Service or parts of our Service.

**Affiliate** means an entity that controls, is controlled by, or is under common control with a party, where "control" means ownership of 50% or more of the shares, equity interest, or other securities entitled to vote for election of directors or other managing authority.

**Website** refers to PolicyGenerate, accessible from <https://policygenerate.com>.

**Company** (also referred to as "we", "us" or "our" in this document) refers to SC Altiora Development SRL, located at Strada Regele Ferdinand nr. 10 ap 33, Targu-Mures, Romania.

**Cookies** are small files that are placed on your computer, mobile device, or any other device by a website, containing details of your browsing history on that website among its many uses.

**Country** refers to: Romania.

**Device** means any device that can access the Service, such as a computer, mobile phone, or digital tablet.

**Personal Data** means any information that relates to an identified or identifiable individual.

**Service** refers to the website.

**Service Provider** means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service, or to assist the Company in analyzing how the Service is used.

**Usage Data** refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

**You** means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

By using our website and by communicating with us, you agree to this Privacy Policy. If you do not agree, please do not use our services.

By visiting the website, purchasing our products and/or services, or by interacting with us through any means and/or via any communication channel (email, phone, social media, etc.), you agree to this Privacy Policy and consent to the use of your data for advertising or marketing purposes. If you do not agree with what is described in this Privacy Policy, please do not use our services or products.

## 3. Links to Other Websites

Our Service (website) may contain links to other websites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services. This Privacy Policy does not cover third-party applications and websites that you may reach by accessing links from our website.

**Important:** Before providing personal data to any third-party site, we encourage you to read their privacy policy to understand how your information will be handled.

## 4. Who Are We?

According to applicable privacy laws, our company is a data controller. To ensure your data is processed securely, we have made every effort to implement reasonable and appropriate technical and organizational measures to protect your personal information.

**Entity name: SC Altiora Development SRL**

Address: Strada Regele Ferdinand nr. 10 ap 33, Targu-Mures, Romania

Contact email: [contact@policygen.ro](mailto:contact@policygen.ro)

## 5. Who Are You?

You are the data subject — a visitor, user, or customer of the website **PolicyGenerate**. To be completely transparent about data processing and to allow you to easily exercise your rights at any time, we have implemented measures to facilitate information access. Please refer to the sections below in this document.

## 6. Our Commitment

The protection of your personal information is very important to us. Therefore, we are committed to complying with European and national legislation on the protection of personal data, in particular Regulation (EU) 679/2016, known as GDPR, and the following principles:

### **Lawfulness, Fairness, and Transparency**

We process your data lawfully and fairly. We are always transparent about the information we use, and you are appropriately informed.

### **You Have Control**

Within the limits of the law, we give you the ability to review, modify, delete the personal data you have shared with us, and to exercise your other rights.

For more information, see Sections 9, 13, and 14 of this document.

## **Data Integrity and Purpose Limitation**

We use data only for the purposes described at the time of collection or for new purposes compatible with the initial ones. In all cases, our purposes are compatible with applicable privacy laws. We take reasonable steps to ensure that personal data is accurate, complete, and up to date.

## **Security**

We have implemented reasonable security and encryption measures to protect your personal information as best as possible. However, please note that no website, application, or internet connection is completely secure.

## **7. Modifications to this Privacy Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will notify you via email and/or a prominent notice on our website, before the change becomes effective, and we will update the "Last updated" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

**Significant changes:** In the case of significant changes that affect how we process your personal data, we will ask for your consent again, if required under applicable privacy laws (including GDPR where applicable).

## **8. Children's Privacy**

Our Service does not address anyone under the age of 13 (or 16 in certain EU jurisdictions). We do not knowingly collect personally identifiable information from anyone under the age of 13.

If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from anyone under the age of 13 without verification of parental consent, we take steps to remove that information from our servers.

If we need to rely on consent as a legal basis for processing your information and your country requires consent from a parent, we may require your parent's consent before we collect and use that information.

**Commitment:** Protecting the privacy of children is especially important to us. If we discover that we have inadvertently collected personal data from a child under the legal age, we will take immediate steps to delete this information.

## **9. Questions and Requests**

If you have questions or concerns about the processing of your data, or if you wish to exercise your legal rights regarding the data we hold, or if you have concerns about how we handle any privacy matters, you can contact us. Please see section **14. Contact** below for available contact methods.

## 10. Your Information

### 10.1. What Data Do We Collect?

We do not collect personal data directly from users.

#### Data Collected Automatically Through Third-Party Services

##### ✓ Analytics tools (Google Analytics)

We collect data about user activity on (pages accessed, time spent, technical device data).

##### ✓ Email communication (Brevo, Brevo)

If you subscribe, we collect your email and interactions with newsletters.

##### ✓ Online payments (Stripe)

Banking data is NOT stored by us. Payment processors manage this data securely.

##### ✓ Invisible reCAPTCHA

Google may collect device and interaction data for anti-spam protection.

*We do not collect data such as GPS location, phone contacts, microphone, camera or device files.*

### 10.2. Why Do We Collect This Information?

The Company may use Personal Data for the following purposes:

- **To provide and maintain our Service:** including to monitor the usage of our website.
- **To manage your Account:** to manage your registration as a user of the Service. The Personal Data you provide can give you access to different functionalities of the Service that are available to you as a registered user.
- **For the performance of a contract:** the development, compliance, and undertaking of the purchase contract for the products, items, or services you have purchased or of any other contract with us through the Service.
- **To contact you:** to contact you by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products, or contracted services, including security updates, when necessary or reasonable for their implementation.
- **To provide you with news, special offers, and general information:** about other goods, services, and events we offer that are similar to those you have already purchased or inquired about, unless you have opted not to receive such information. This is done only if we have your prior consent or when there is a legal exception from obtaining consent.
- **To manage your requests:** to respond to and manage requests you make to us.
- **For business transfers:** we may use your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other 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 Data held by us about our Service users is among the assets transferred.
- **For other purposes:** we may use your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns, and to evaluate and improve our Service, products, services, marketing, and your experience.

- **For legal compliance:** to comply with applicable laws, such as compliance with tax legislation that requires us to retain accounting documents for a period of 10 years.
- **For protection and security:** to defend ourselves against cyber attacks, to prevent crimes, fraud or scams, and to establish or assert a legal claim in court.
- **For payment processing:** to process payments securely through our payment service providers.

### 10.3. How Long Do We Keep the Data?

The Company will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer periods.

#### Specific retention periods:

- **Account and profile data:** retained for the entire duration of your account's existence and up to 30 days after account deletion, for recovery in case of accidental deletion.
- **Transaction and payment data:** retained for a minimum period as required by applicable legal and tax obligations (varies by jurisdiction, typically 7-10 years).
- **Communication data (email, messages):** retained for up to 3 years from the last interaction or until consent is withdrawn.
- **Analytics and usage data:** retained for up to 26 months for trend analysis and service improvement.
- **Security data and system logs:** retained for up to 12 months for fraud detection and prevention.

### 10.4. How Do We Share Your Information?

We may share your personal information in the following situations:

- **With Service Providers:** we may share your personal information with Service Providers to monitor and analyze the use of our Service (Google Analytics), to contact you via email services (Brevo, Brevo), for payment processing (Stripe), or for other services essential to platform operations.
- **For business transfers:** we may share or transfer your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of our business to another company.
- **With Affiliates:** we may share your information with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include our parent company and any other subsidiaries, other companies that we control or that are under common control with us.
- **With business partners:** we may share your information with our business partners to offer you certain products, services or promotions.
- **With other users:** when you share personal information or interact in public areas with other users, this information may be viewed by all users and may be publicly distributed outside.
- **With your consent:** we may disclose your personal information for any other purpose with your consent.

**Data protection:** We ensure that all our third-party service providers comply with applicable data protection legislation (including GDPR where applicable). We enter into Data Processing Agreements (DPA) with all data processors to guarantee adequate protection of your information.

### 10.5. Disclosure of Your Personal Data

#### Business Transactions

If the Company is involved in a merger, acquisition, or asset sale, your Personal Data may be transferred. We will provide notice before your Personal Data is transferred and becomes subject to a different Privacy Policy.

## Law Enforcement

Under certain circumstances, the Company may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (for example, a court or a government agency).

## Other Legal Requirements

The Company may disclose your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

# 11. Security of Your Personal Data

The security of your Personal Data is important to us, but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially reasonable means to protect your Personal Data, we cannot guarantee its absolute security.

### Implemented security measures:

- **Encryption:** We use SSL/TLS encryption protocols to protect data in transit.
- **Access control:** Access to personal data is restricted only to authorized personnel who need this information to perform their duties.
- **Monitoring:** We continuously monitor our systems for potential vulnerabilities and attacks.
- **Regular updates:** We keep all systems and software updated with the latest security patches.

In the event of a data security breach that poses a risk to your rights and freedoms, we will notify you in accordance with applicable privacy law requirements (including GDPR's 72-hour requirement where applicable) from the discovery of the incident.

# 12. Marketing

To the extent that we have obtained your prior consent or you are already a client of the company, we may use direct marketing and targeted advertising technologies, using information collected about you regarding interests, preferences, purchases, age, location, etc. For example, we may send emails.

## 12.1. What kind of data do we collect for marketing?

For the purpose of conducting direct marketing or targeted advertising activities, we may use the following information:

- Information collected through cookies and other similar technologies (location, device, browser, age, etc.)
- Your purchases, how you have interacted with our goods and services, and feedback received from you.
- Age, country, region, gender

## 12.2. How can you unsubscribe?

You can unsubscribe from our marketing communications at any time, via the link in each email or through a contact request. See section **14. Contact** for details.

# 13. Your Privacy Rights

Under applicable privacy laws (including GDPR where applicable), you have the following rights:

- **Right of access:** you have the right to obtain confirmation as to whether or not we are processing your personal data and, if so, to have access to it.
- **Right to rectification:** you have the right to request the correction of inaccurate data or the completion of incomplete data.
- **Right to erasure ("right to be forgotten"):** you have the right to request the deletion of your personal data in certain circumstances.
- **Right to restriction:** you have the right to request the restriction of the processing of your data under certain conditions.
- **Right to data portability:** you have the right to receive the data you have provided to us in a structured, commonly used, and machine-readable format.
- **Right to object:** you have the right to object to the processing of your personal data in certain situations.
- **Right to withdraw consent:** when processing is based on consent, you have the right to withdraw your consent at any time.
- **Right to lodge a complaint:** you have the right to lodge a complaint with your local data protection supervisory authority.

### 13.1. Deletion of Your Personal Data

You have the right to delete or request that we assist you in deleting the Personal Data that we have collected about you.

Our Service (website) may give you the ability to delete certain information about you from within the Service.

You may update, modify, or delete your information at any time by signing in to your Account, if you have one, and accessing the account settings section that allows you to manage your personal information. You may also contact us to request access to, correct, or delete any personal information that you have provided to us.

**Important note:** Please note, however, that we may need to retain certain information when we have a legal obligation or lawful basis to do so, such as:

- Accounting and tax obligations (varies by jurisdiction, e.g., 7-10 years for financial documents)
- Fraud prevention and security assurance
- Compliance with legal data retention requirements
- Resolving disputes and enforcing our agreements

To exercise your rights, you may contact us. Please see section **14. Contact** below for available contact methods.

# 14. Contact

For any questions or requests related to this Privacy Policy or to exercise your privacy rights, you can contact us at:

**SC Altiora Development SRL**

Registered address: Strada Regele Ferdinand nr. 10 ap 33, Targu-Mures, Romania

**Contact methods:**

- **Email:** contact@policygen.ro

Thank you for reading this Privacy Policy.