DiRoots.
AN NTI TECHNOLOGY

PRIVACY POLICY

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AUTODESK
Authorized Developer

PRIVACY POLICY

DiRoots Limitada ("DiRoots", "we", "our", "us") is part of the NTI Group. We operate the website https://diroots.com, and offer web services, desktop applications, mobile applications and related software and services. This Privacy Policy explains how we collect, use, disclose and safeguard your information when you use our services and products, and how we use information for marketing communications where permitted.

This Privacy Policy should be read together with any specific notices presented at the point where Personal Data is collected. Where consent is requested for marketing, that consent is optional and separate from acceptance of this Privacy Policy.

1. How This Privacy Policy Applies

This Privacy Policy applies to all DiRoots websites, web services, desktop applications, mobile applications, free add-ins, trial requests, purchases, registrations, downloads, newsletters and related services (collectively, the "Services").

Using the Services does not by itself constitute consent to receive marketing communications. Where marketing relies on consent, we request that consent separately and you may withdraw it at any time.

2. Information We Collect and How We Use It

We may collect and process information that identifies you or can reasonably be linked to you ("Personal Data"), including:

- Name and, where applicable, job title or professional role
- Company name and business contact details
- Email address and telephone number
- IP address
- Device information, such as computer name, browser version and operating system
- Usage data, such as pages visited, date and time of access, time spent on pages and product usage information
- Purchase, subscription, license, trial, registration and support information
- Marketing preferences, including whether you opted in or opted out
- Where consent is used, records such as the consent wording/version, date, collection point and withdrawal history

Legal Basis for Processing: We process your Personal Data under the following legal bases:

- **Consent:** For marketing communications and non-essential cookies, we obtain your explicit consent.
- **Contractual Necessity:** To fulfill our contractual obligations to you, such as providing our services or processing your orders.
- **Legal Obligation:** For processing necessary to comply with legal obligations, such as accounting and auditing.

3. How We Collect Your Data

We collect Personal Data directly from you and through your use of the Services, including when you:

- Register online or create an account
- Place an order or purchase our products and services
- Request or activate a trial
- Download or install a free product or add-in

- Sign up for a newsletter or other communications
- Submit a support request, survey, form or feedback
- Use our website, web services, desktop applications or mobile applications

4. How We Use Your Data

We use Personal Data for the following purposes:

- **Service Delivery:** to process orders, manage accounts and licences, provide trials and downloads, provide support and fulfil our contractual obligations.
- **Marketing:** where permitted by applicable law, to send information, updates and offers relating to DiRoots products and services and, where you have opted in, products and services from other companies in the NTI Group.
- **Service Improvement:** to analyse usage and improve our products, services and user experience.
- **Security:** to protect the security and integrity of our Services.
- **Analytics and Statistics:** to generate aggregate statistical information and perform market research.
- **Fraud Prevention:** to verify authorised use of our Services and prevent fraud or misuse.
- **Legal and Administrative Purposes:** to comply with accounting, tax, audit and other legal obligations, and to establish, exercise or defend legal claims where necessary.

4.1. Marketing Communications and the NTI Group

DiRoots is part of NTI Group. If you choose to opt in to marketing, marketing communications may concern DiRoots products and services and products or services from other NTI Group companies that are similar, related or complementary to DiRoots' offering and reasonably relevant to you. These may include NTI Group companies providing software, digital solutions, professional services, consultancy, training or other related solutions for the markets served by DiRoots and NTI Group.

Where you have given this marketing consent, DiRoots may share the Personal Data needed for marketing with the relevant NTI Group company or companies so that they may contact you directly. The recipient will be selected based on the relevance of its products or services to you, including your location, organisation, interests, products used or requested, and the subject of your enquiry.

Marketing consent is optional, is requested separately from acceptance of this Privacy Policy, and is not pre-selected by default. You may withdraw your consent at any time. Withdrawal does not affect processing that was lawful before withdrawal.

We may also send certain communications without relying on marketing consent where another lawful basis applies, including communications necessary to provide the Services, respond to your request, manage a customer relationship, or where applicable law permits communications about our own similar products or services. You may object to direct marketing at any time.

5. Legal Basis for Processing

Depending on the processing activity, we rely on one or more of the following legal bases:

- **Consent:** for marketing communications and non-essential cookies where consent is required. Consent may be withdrawn at any time.
- **Contractual Necessity:** to provide products or services you request, process orders, manage licences, trials and accounts, and provide support.
- **Legal Obligation:** where processing is necessary to comply with legal obligations such as accounting, tax, audit and regulatory requirements.
- **Legitimate Interests:** where applicable and permitted by law, for purposes such as service security, fraud prevention, service improvement, business administration and certain

communications concerning our own similar products or services, provided those interests are not overridden by your rights and interests.

6. Data Sharing and Transfers

We may disclose Personal Data only where there is an appropriate purpose and legal basis. Categories of recipients include:

- **NTI Group Companies:** where necessary for group administration or, for marketing, where you have opted in as described in Section 4.1. For marketing, sharing is limited to relevant NTI Group companies whose products or services are reasonably relevant to you.
- **Hosting Providers:** such as Microsoft Azure.
- **Payment Processors:** such as Stripe.
- **Analytics Services:** such as Google Analytics, subject to applicable cookie and consent requirements.
- **Cloud and Integration Services:** such as Google Drive API, where used in connection with a feature or service you choose to use.
- **Professional Advisers and Authorities:** where reasonably necessary for legal, accounting, audit, compliance or regulatory purposes.

Transfers Outside the EEA: If Personal Data is transferred outside the European Economic Area to a country that is not recognised as providing an adequate level of protection, we use an applicable lawful transfer mechanism, such as Standard Contractual Clauses, and take appropriate supplementary measures where required.

7. Data Retention

We retain your Personal Data as follows:

- **Accounting and Auditing:** Indefinitely, as required by legal obligations.
- **Other Processing:** Until you request the deletion of your data or until it is no longer necessary for the purposes for which it was collected.

8. Data Security

We take the security of your Personal Data seriously and implement commercially reasonable measures to protect it. However, no method of transmission over the Internet or electronic storage is 100% secure, and we cannot guarantee absolute security.

9. Your Data Protection Rights

Under GDPR, you have the following rights:

- **Right to Access:** Request copies of your personal data.
- **Right to Rectification:** Request correction of inaccurate or incomplete data.
- **Right to Erasure:** Request deletion of your data.
- **Right to Restrict Processing:** Request restriction of your data processing.
- **Right to Object:** Object to the processing of your data.
- **Right to Data Portability:** Request transfer of your data to another organization or directly to you.

To exercise any of these rights, please contact us at support@diroots.com.

10. Cookies and Tracking Technologies

Cookies: We use cookies to improve your experience on our website. Upon visiting our website, you will be prompted to accept the use of cookies. You may manage your cookie preferences, accepting only essential cookies if you wish.

Types of Cookies We Use:

- **Functionality Cookies:** To recognize you and remember your preferences.
- **Marketing Cookies:** To track your browsing patterns and provide targeted advertisements.

You can set your browser to not accept cookies, but this may affect your ability to use some features of our website.

11. Legal Jurisdiction

This Privacy Policy and any disputes related to it shall be governed by and construed in accordance with Portuguese law. Any disputes arising under this Privacy Policy shall be resolved in the courts of Portugal.

12. Changes to This Privacy Policy

We may update or change our Privacy Policy at any time. Any changes will be effective immediately upon posting on this page. Your continued use of our Services after such changes constitutes your acknowledgment and consent to the updated Privacy Policy.

If we make any material changes to this Privacy Policy, we will notify you through the email address you have provided or by placing a prominent notice on our website.

13. Contact Us

If you have any questions about this Privacy Policy or your rights under GDPR, please contact us at support@diroots.com.