

# RESIN8 PRIVACY POLICY

Effective Date: [Insert Date] Last Updated: [Insert Date]

## INTRODUCTION AND SCOPE

Resin8 LLC operates an industrial equipment marketplace platform that connects buyers and sellers worldwide. This Privacy Policy explains how we collect, use, share, and protect personal information in connection with our platform services. This policy applies to all users of our platform regardless of location and supplements our User Agreement and Data Processing Agreement.

We are committed to protecting your privacy while operating a secure and efficient marketplace. This policy describes our practices regarding personal information and your rights under applicable privacy laws including the European Union General Data Protection Regulation, Canada's Personal Information Protection and Electronic Documents Act, the Texas Data Privacy and Security Act, and other applicable data protection regulations.

## INFORMATION WE COLLECT

We collect information that you provide directly to us, information we obtain automatically through your use of our platform, and information we receive from third parties in connection with marketplace transactions.

Information You Provide Directly includes your account registration details such as business name, contact information, and authentication credentials. We also collect transaction-related information including equipment listings, purchase orders, payment details, and communications between users. Additionally, we gather any information you choose to provide in your user profile, support requests, or direct communications with our team.

Information Collected Automatically encompasses technical data about your platform usage including device information, browser type, operating system, and IP address. We maintain logs of your activities on our platform including pages visited, search queries, listing views, and transaction history. Our systems also collect performance data to monitor platform functionality and security.

Information from Third Parties includes verification data from identity verification services, payment information from payment processors, and shipping details from logistics providers. We may also receive business information from commercial databases and public records to verify business credentials and comply with regulatory requirements.

## HOW WE USE YOUR INFORMATION

We use personal information to provide and improve our marketplace services, facilitate transactions between users, and comply with legal obligations. Our primary purposes for processing personal information include operating the marketplace platform, managing user accounts, and facilitating communications between buyers and sellers.

Platform Operations and Services involve using your information to maintain your account, process transactions, provide customer support, and deliver platform features. We analyze usage patterns to improve platform performance, develop new features, and enhance user experience. Security monitoring and fraud prevention activities protect both individual users and the marketplace community.

Artificial Intelligence and Machine Learning applications use your data to train and improve our AI systems including equipment classification algorithms, pricing estimation models, fraud detection systems, and recommendation engines. We employ artificial intelligence to enhance listing quality, improve search functionality, and provide personalized platform experiences. All AI processing is conducted in accordance with applicable laws. You have the right to object to this processing under GDPR Article 21 or to opt out under applicable state privacy laws including TDPSA Section 541.051(a)(3). To exercise these rights, contact [privacy@resin8.ai](mailto:privacy@resin8.ai).

Business Operations require processing information for accounting and tax purposes, regulatory compliance including export control and sanctions screening, insurance and risk management, and business analytics to understand market trends and platform performance.

## **ARTIFICIAL INTELLIGENCE AND AUTOMATED PROCESSING**

Our platform extensively utilizes artificial intelligence and automated processing systems to enhance marketplace functionality and user experience. We employ machine learning algorithms for equipment categorization, pricing recommendations, fraud detection, content moderation, and user matching services.

AI Training and Development involves using platform data including listing content, transaction patterns, search queries, and user interactions to train and improve our artificial intelligence models. This processing enables us to provide better equipment recommendations, more accurate pricing estimates, and enhanced fraud protection. We implement appropriate technical and organizational measures to protect personal information used in AI training processes.

Automated Decision-Making on our platform includes: (a) account suspension or termination based on fraud-detection algorithms; (b) content moderation algorithms that review, reject, or remove listings based on policy compliance systems; (c) transaction blocking based on sanctions screening; and (d) credit or payment eligibility determinations. You have the right under GDPR Article 22 and TDSPA Section 541.051(a)(3) to (a) request human review of automated decisions; (b) obtain explanation of the decision-making logic; (c) contest automated decisions and provide additional context; and (d) opt out of profiling that produces legally significant effects. To request human review, contact [privacy@resin8.ai](mailto:privacy@resin8.ai) with your account details and the specific decision you wish to contest. We will respond within 30 days with our review findings.

## **INFORMATION SHARING AND DISCLOSURE**

We share personal information in limited circumstances necessary for platform operations, legal compliance, and service provision. We do not sell personal data as defined under applicable privacy laws. We do not exchange personal data for monetary consideration, and we do not share personal data with third parties for those parties' independent marketing purposes.

Transaction Facilitation requires sharing relevant information between buyers and sellers to complete marketplace transactions. This includes contact information, shipping details, and transaction-specific communications. We also share information with payment processors, shipping companies, and other service providers necessary for transaction completion.

Service Providers and Business Partners receive personal information necessary to provide platform services including cloud hosting providers, payment processors, identity verification services, customer support platforms, and analytics providers. All service providers are contractually obligated to protect

personal information and use it only for authorized purposes.

Legal and Regulatory Compliance may require disclosure of personal information to government authorities, law enforcement agencies, regulatory bodies, and courts in response to legal process, regulatory investigations, or compliance requirements. We cooperate with authorities investigating potential violations of export control laws, sanctions regulations, tax obligations, and other applicable legal requirements.

Business Transfers could result in personal information being transferred in connection with mergers, acquisitions, asset sales, or similar corporate transactions. In such circumstances, we will provide notice and ensure continued protection of personal information under substantially similar privacy practices.

## **INTERNATIONAL DATA TRANSFERS**

Our platform operates internationally with engineering teams in Canada, service providers worldwide, and users across multiple jurisdictions. Personal information may be transferred to and processed in countries with different data protection standards than your country of residence.

Cross-Border Processing occurs when we transfer personal information between our operations in the United States and Canada, share information with international service providers, and facilitate transactions between users in different countries. We implement appropriate safeguards for international transfers including Standard Contractual Clauses for European Union data transfers, adequacy decision frameworks where available, and additional technical and organizational measures for restricted transfers.

Legal Basis for Transfers includes your consent to international processing when you use our platform, our legitimate business interests in operating an international marketplace, and contractual necessity for providing platform services and facilitating global transactions.

## **YOUR PRIVACY RIGHTS**

Your privacy rights vary depending on your location and applicable data protection laws. We respect and facilitate the exercise of all applicable privacy rights while maintaining platform security and legal compliance.

Universal Rights available to all users include the right to access personal information we maintain about you, correct inaccurate or incomplete personal information, request deletion of personal information subject to legal and business limitations, and receive portable copies of your personal information in machine-readable formats.

European Union and European Economic Area Users have additional rights under the General Data Protection Regulation including the right to restrict processing of personal information, object to processing based on legitimate interests, withdraw consent for consent-based processing, and lodge complaints with supervisory authorities in your country of residence.

Texas Residents have specific rights under the Texas Data Privacy and Security Act including the right to opt out of targeted advertising, opt out of the sale of personal information, opt out of profiling activities that produce significant effects, and use universal opt-out mechanisms recognized by our platform.

Canadian Users have rights under the Personal Information Protection and Electronic Documents Act including the right to withdraw consent for specific processing activities, file complaints with the Privacy Commissioner of Canada, and receive explanations of our personal information practices and policies.

Exercising Your Rights requires submitting requests to our designated privacy contact at [privacy@resin8.ai](mailto:privacy@resin8.ai) with sufficient information to verify your identity and specify the rights you wish to exercise. We respond to privacy rights requests within thirty days for most jurisdictions, forty-five days for Texas requests, and other timeframes as specified by applicable law.

## **DATA RETENTION AND DELETION**

We retain personal information for the minimum period necessary to fulfill the purposes for which it was collected, comply with legal obligations, resolve disputes, and enforce our agreements. Retention periods vary based on the type of information, applicable legal requirements, and business needs.

Account Information is retained for seven years after account closure or transaction completion to comply with (a) Internal Revenue Code requirements for business record retention (26 U.S.C. § 6001); (b) Texas Tax Code requirements for sales tax records (Texas Tax Code § 111.0041); (c) commercial statute of limitations periods under Texas Business and Commerce Code § 2.725; and (d) potential audit, litigation, or regulatory investigation needs.

AI Training Data may be retained indefinitely in anonymized or aggregated form to support ongoing artificial intelligence development and platform improvement. We implement technical measures to prevent re-identification of individuals from AI training datasets while preserving the utility of data for machine learning purposes.

Communication records are retained for three years to support customer service and dispute resolution needs.

Legal Retention Requirements may extend retention periods beyond our standard practices when required by tax laws, regulatory obligations, litigation holds, or other legal processes. We regularly review retention practices to ensure compliance with evolving legal requirements and delete personal information when retention is no longer necessary or legally required.

## **DATA SECURITY AND PROTECTION**

We implement comprehensive technical, organizational, and physical safeguards to protect personal information against unauthorized access, use, disclosure, alteration, and destruction. Our security measures are designed to provide protection appropriate to the sensitivity of personal information and the risks of processing.

Technical Security Measures include encryption of personal information in transit and at rest using industry-standard protocols, access controls and authentication systems that limit data access to authorized personnel, network security monitoring and intrusion detection systems, and regular security assessments and vulnerability testing.

Organizational Security Measures encompass employee training on data protection and security practices, confidentiality agreements and security obligations for all personnel with data access, vendor security assessments and contractual security requirements, and incident response procedures for data breaches and security events.

Physical Security Controls protect our facilities and systems through restricted access to data centers and office facilities, environmental controls and monitoring systems, secure disposal of hardware and storage media, and backup and disaster recovery procedures to ensure data availability and integrity.

Breach Notification procedures ensure that we promptly investigate security incidents, notify affected individuals and regulatory authorities as required by applicable law, implement remediation measures to address security vulnerabilities, and provide regular updates on incident resolution progress.

## **COOKIES AND TRACKING TECHNOLOGIES**

Our platform uses cookies, web beacons, and similar tracking technologies to provide platform functionality, analyze usage patterns, and improve user experience. These technologies help us remember your preferences, authenticate your sessions, prevent fraud, and deliver relevant content.

We obtain your consent before placing optional cookies through our cookie banner. You may withdraw consent at any time through browser settings or our cookie preference center.

Essential Cookies are necessary for basic platform functionality including session management, authentication, security features, and transaction processing. These cookies cannot be disabled without affecting platform functionality and are not used for tracking or advertising purposes.

Analytics and Performance Cookies help us understand how users interact with our platform, identify popular features and content, measure platform performance and reliability, and troubleshoot technical issues. This information is used to improve platform design and functionality.

Managing Cookie Preferences can be accomplished through your browser settings to block or delete cookies, though this may affect platform functionality. Some jurisdictions provide specific rights regarding tracking technologies, and we respect preferences expressed through universal opt-out mechanisms where legally required.

## **CHILDREN'S PRIVACY**

Our platform is designed for business-to-business transactions and is not intended for use by individuals under eighteen years of age. We do not knowingly collect personal information from children, and our terms of service prohibit account creation by minors.

Age Verification measures include requiring business credentials during account registration, monitoring for indicators of underage use, and promptly investigating reports of potential child accounts. If we discover that we have collected personal information from a child, we will delete such information promptly and terminate the associated account.

Parental Controls and educational resources are available for parents and guardians who may discover that a child has created an account or accessed our platform. We encourage parents to monitor their children's internet activities and contact us immediately if they believe a child has provided personal information through our platform.

Our platform complies with the Children's Online Privacy Protection Act (COPPA). We do not knowingly collect personal information from children under 13 years of age. If we discover that we have inadvertently collected information from a child under 13, we will delete such information within a reasonable timeframe and notify the parent or guardian if contact information is available. Parents or guardians who believe a child under 13 has provided information to our platform should contact [privacy@resin8.ai](mailto:privacy@resin8.ai) immediately.

## **CONTACT INFORMATION AND COMPLAINTS**

We are committed to addressing privacy concerns and facilitating the exercise of your privacy rights. Our privacy team is available to assist with questions, complaints, and requests related to personal information processing.

Privacy Contacts include our designated privacy rights agent is: Shehryar Siddiqui. Resin8 LLC 1209 Orange Street, Wilmington, New Castle County, Delaware 1980, [privacy@resin8.ai](mailto:privacy@resin8.ai) [Phone Number], our email is [privacy@resin8.ai](mailto:privacy@resin8.ai) for general privacy inquiries and rights requests. You may also contact our legal team at [legal@resin8.ai](mailto:legal@resin8.ai) for complex privacy matters or legal questions.

Complaint Resolution begins with internal review of privacy concerns and good faith efforts to resolve issues directly with affected individuals. We maintain records of privacy complaints and their resolution to identify trends and improve our privacy practices.

Regulatory Complaints may be filed with appropriate supervisory authorities if you are not satisfied with our response to privacy concerns. European Union users may contact their national data protection authority, Canadian users may file complaints with the Privacy Commissioner of Canada, and Texas residents may contact the Texas Attorney General's office.

## **CHANGES TO THIS PRIVACY POLICY**

We may update this Privacy Policy periodically to reflect changes in our practices, applicable laws, regulatory requirements, or platform features. Material changes will be communicated through prominent notice on our platform, email notification to account holders, and other appropriate means based on the significance of the changes.

Notice Periods for privacy policy changes include thirty days advance notice for material changes affecting data processing practices, fourteen days notice for changes required by legal or regulatory developments, and immediate notice for emergency changes necessary to protect user safety or platform security.

Continued Use of our platform after privacy policy changes become effective constitutes acceptance of the updated practices. If you disagree with privacy policy changes, you may terminate your account and request deletion of your personal information subject to legal retention requirements.

## **EFFECTIVE DATE AND PRIOR VERSIONS**

This Privacy Policy is effective as of the date listed above and supersedes all prior versions. Previous versions of our privacy policy are available upon request for users who need to reference historical privacy practices for legal or business purposes.

Transitional Provisions ensure that personal information collected under previous privacy policies continues to be protected according to the commitments made at the time of collection, unless you consent to processing under updated terms or legal requirements mandate changes to our practices.

Questions or concerns about this Privacy Policy should be directed to [privacy@resin8.ai](mailto:privacy@resin8.ai) or our legal team at [legal@resin8.ai](mailto:legal@resin8.ai).