

Privacy Policy Torengue

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ABOUT THIS PRIVACY POLICY

Welcome to **Torengue**,

Please read and understand this Privacy Policy with due care and attention, as it outlines our policies regarding how Torengue collects, uses, handles, shares, and discloses your personal data when you visit, use, or purchase services through the Torengue platform, including our website (www.torengue.com) and our mobile application available on the Google Play Store at <https://play.google.com/store/apps/details?id=apptorenguecom.wpapp> (hereinafter referred to as “we,” “our,” “us,” or “**Torengue**”). The platform is being owned, controlled, managed and/ or supervised by the company **Torengue** registered in France under the SIRET number 888 016 904 00011, with its registered office located in 2 place Léon Imbert, 13005 Marseille, France / Torengue Moroni Malouzini, Comoros. By accessing or using our services, you expressly acknowledge that you have read, understood, and accepted this Privacy Policy and that you have the legal authority to bind the legal entity you represent. We affirm that we will not use, share, or disclose your personal data to any third party except as expressly described in this Privacy Policy. This Privacy Policy does not apply to any information you may choose to provide directly to third parties. Torengue disclaims any responsibility or liability for such data sharing initiated by you. Torengue reserves the right to modify, amend, or update this Privacy Policy at any time, with or without prior notice. You will be informed of such changes either via email or through a notice posted on our website. Your continued use of our platform after such changes have been made constitutes your acceptance of the revised Privacy Policy. We recommend that you review this policy periodically to stay informed about any updates.

Torengue knows that you are conscious of the data you share with us and we know how to protect our valued customer's information to keep their trust.. The main object of this privacy policy is to aware you about our responsibility to retain, manage, preserve and protect your data as per European privacy laws and Cyber Laws requirement of France.

SALIENT FEATURES

These salient features help you to understand:

- What kind of data we collect
- Why we collect your data
- What methods we use to collect your data
- How to update and remove your data

1. HOW WE COLLECT YOUR DATA

We collect your information in the following ways:

1.1 Direct method

1.2 Indirect method

2. INFORMATION WE COLLECT

2.1 Direct method

The type of personal data that we may collect directly from your input includes:

- **Personal information:**
 - a) Legal name (First name, Maiden name, Last name),
 - b) E-mail,
 - c) Postal Address,
 - d) Country
 - e) State
 - f) Phone Number
- **Financial Information:**
 - a) Credit or Debit Card Information,
 - b) Payment gateway
- **Demographic information:**
 - a) Date of Birth (Age)
- **Feedback:**
 - a) Comments,
 - b) feedback,
 - c) Surveys
 - d) Complaints

Please Note that our data collection practices are strictly limited to what is necessary for the provision of our best services, ensuring compliance with relevant data protection laws. We also reserve the right to ask you for certain additional information when you report a problem with our services or Website or App technical issues.

2.2 Indirect method

We may also collect data from;

- Third parties
- Data from social media platforms
- Automated services

2.2.1 Data from Third Parties

We may obtain information about you from various third parties such as data analytics providers, marketing or advertising service providers, fraud prevention service providers or publicly available sources.

2.2.2 Data from Social Media Platforms

We also collect your data when you interact with us through social media platforms including Instagram, Tiktok, Facebook, X, Google, LinkedIn etc.,. For more information about the privacy practices of those social media platforms,

please review the privacy policies and settings of the social media platforms that you use.

2.2.3 Data through Automated Technologies

We may automatically receive or collect your data when you visit or interact with us either through a browser or mobile application.

- Device information,
- Internet protocol (IP) address of the device
- Browser type,
- Operating system,
- Internet service provider (ISP)
- Files viewed on our site (e.g., HTML pages, graphics, etc.)
- Browsing actions and patterns,
- Software and hardware under usage
- Information about your visit to our website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.

You agree and admit that if you allow us to send you the information through newsletters, marketing material or other forms of information, we will treat such authorization as a permission to use or store such information until you actively withdraw such permission by clicking the link in the newsletter or by contacting via mail.

3. COOKIES

Torengue may use various methods, techniques and technologies for tracking the activity on our Website or App which include the use of cookies (or browser cookies). Cookies are small files stored on the hard drive of your device when you visit our Website or App via browser or mobile application. The information collected through cookies helps us to analyze and determine how frequently you are visiting Torengue and to enable us to enhance or personalize your experience with us. You are fully authorized accept or decline our browser cookies through the appropriate settings. However, if you do not accept cookies, you may not be able to access some specific portion of our services or the part of the Website or App may not be operative properly.

4. USE OF YOUR INFORMATION

We may process and use your personal information for the following lawful purposes, in accordance with applicable data protection laws:

- Activate and manage your personal account,
- Process and fulfill a request, order, subscription or other transaction related to your purchase,
- Enhance and improve our services, customer support and other possible improvements,

- Answer your requests, inquiries, comments, and concerns.
- Notify you about changes, updates, and other announcements related to our services,
- Invite you to participate in surveys as well as in promotions,
- Identify usage trends, analyze data, evaluate our business performance, or in other ways according to a customer agreement,
- Comply with our legal obligations, resolve disputes, and enforce our agreements,
- Prevent frauds, illegal and invalid transactions,
- Run security checks and other tools to protect our service.

5. DISCLOSURE OR SHARING OF YOUR DATA

5.1 Legal Purpose

We will disclose your personal information if we have an honest faith belief that such disclosure is important to;

- a) meet any applicable law, rules and regulation, legal process, court order and/or other legal obligation;
- b) detect, investigate and help prevent security, fraud, or technical Issues and/or
- c) protect the rights, property, or safety of the company, our users, employees and/or others.

5.2 Google Analytics

We may use your data for analytical purposes and Google firebase to conduct surveys and improve our services.

5.3 Acquisition and Merger

Torengue reserves the right to share personal data in the event of a merger, acquisition, asset sale, or collaboration with another company. In such cases, your data may be transferred to the new entity or partner.

5.4 Advertisement

We may share your personal data with advertising agencies, affiliates, sponsors, venture partners and other third parties, including those for whom we act as an agent, licensee, application host, or publisher. These entities may send you promotional content about products and services that align with your preferences. You have the option to opt out of such communications or unsubscribe at any time.

6. PRIVACY RIGHTS UNDER THE GENERAL DATA PROTECTION REGULATION (GDPR)

While using the services provided by **Torengue**, you acknowledge and accept full responsibility for ensuring that all personal information submitted is accurate, complete, and up to date. Any inaccuracies in the information you provide may affect the services we offer and the execution of related transactions. You are solely responsible for maintaining and updating your personal data as needed.

In accordance with the **General Data Protection Regulation (EU) (“GDPR”)**, users who are residents of the France, United Kingdom (UK) and the European Economic Area (EEA) are granted specific rights concerning their personal data, including but not limited to:

6.1 Right to Access (Article 15 GDPR):

You have the right to obtain confirmation as to whether or not your personal data is being processed, as well as access to such data.

6.2 Right to Rectification (Article 16 GDPR):

You may request the correction of inaccurate or incomplete personal information.

6.3 Right to Erasure (“Right to be Forgotten”) (Article 17 GDPR):

You may request the deletion of your personal data under certain circumstances, such as when the data is no longer necessary for the purpose for which it was collected.

6.4 Right to Object (Article 21 GDPR):

You have the right to object to the processing of your personal data if it violates your fundamental rights and freedoms.

6.5 Right to Restriction of Processing (Article 18 GDPR):

Under certain conditions, you may request that we limit the processing of your personal data.

6.6 Right to Data Portability (Article 20 GDPR):

You have the right to receive your personal data in a structured, commonly used, and machine-readable format and to transmit it to another data controller where technically feasible.

6.7 Right to Withdraw Consent (Article 7(3) GDPR):

You may revoke any consent previously granted for data processing activities at any time, without affecting the lawfulness of processing conducted before such withdrawal.

All privacy related requests including GDPR shall be processed within seven 7 working days. We reserve the right to verify the identity of individuals submitting requests before processing them. The fulfillment of addition or deletion requests is subject to any applicable legal retention requirements. The exercise of privacy rights under GDPR shall not limit any other rights or remedies available under applicable privacy laws of France. For further information or to exercise any of the rights mentioned above, please contact us at contact@torengue.com.

7. DATA RETENTION

You admit that we hold the rights to retain and securely store your personal data for period 3 years or as long as necessary to comply with our obligations such as:

- a) Maintaining our Website or App
- b) Complying with our legal obligations,
- c) Detecting and preventing fraud and abuse, and enforcing our agreements,

If you access the Service through a subscription administered or sponsored by your organization, we may retain your organizational contact details after the termination of your organization's subscription to still communicate with you.

8. MINOR (UNDER 18 YEARS)

Torengue does not intentionally or deliberately collect, receive, retain or store personal data from children under the age of 18. We also do not sell our services to minors and we do not knowingly collect any personal data relating to minors without the permission of their parents or guardian. You hereby requested to confirm that you are above the age of 18 and are capable of understanding the terms of this Privacy Policy.

We will not be responsible for any unauthorized use of your account on the Website or App by yourself and it is your responsibility to make your own informed decisions about the use of the Website or App and take necessary steps to prevent any misuse of it.

9. DATA SECURITY

You should be aware that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures. We take administrative, physical, and technical security measures to protect your personal data and prevent unauthorized or unlawful access to or accidental loss of or destruction or damage to your data. When we collect data through the Website or App, we collect your personal details on a secure server. We may occasionally request proof of identity before we disclose personal information to you on your request. You admit that you are solely responsible for protecting against unauthorized access to your specific username or password.

10. CONSENT FOR DATA COLLECTION

By using our Website or App for availing our services, you consented to us to collect, preserve and use your personal data as per this policy.

11. LOCATIONS OF PROCESSING

Your personal data may also be stored and processed in our database as long as required necessary. We will take every possible step to make sure that your data continues to be protected according to the standards of protection required under applicable laws of France.

12. CHANGES TO OUR PRIVACY POLICY

You agree that changes are necessary to meet the requirement of standard or comply with relevant laws, rules and regulation. We reserve the rights to change, amend, modify, or update this privacy at any time. The latest update will be intimated to you via email and/or posting a notice on our Website or App, prior to the change becoming effective. The updated version of the amended policy will be indicated as “**Revised or Updated**”. We request you to keep visiting

our website/app regularly to be informed of how we are protecting your personal data. The modification, changes or update will be effective from the date of publishing.

13. CONTACT

If you have any questions, queries, comments, complaints, or requests regarding this privacy policy or our processing of your information, please contact us

Email: contact@torengue.com

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