

Privacy Policy

Last updated: October 2025

1. Who we are

Singularity 9 LLC is a company registered in the United States, with its registered office at **1007 N Orange St. 4th Floor Suite #595, Wilmington, DE 19801, State/Province: Delaware, United States of America, VAT code: 61-2013429.**

We also operate through our European subsidiary, **Singularity 9 SRL**, registered in Romania at **Bld. Carol I, Nr.5, Sc.A, Et.1, Ap.5 Iasi, State/Province: Iasi, Country: Romania, VAT code: RO46247662**

This Privacy Policy describes how we collect, use and protect your personal information and how you can exercise your privacy rights under both US and European privacy laws.

If you have any questions or requests regarding your personal data, please contact us at: **contact@singularity9.com**

2. Information we collect

We may collect the following information collected automatically (through cookies or analytics):

- IP address
- Browser type and version
- Device type and operating system
- Pages viewed and time spent
- Referring website URLs

3. How we use your information

We use your personal data to:

- Respond to your inquiries and provide the requested information.
- Communicate about our products and services (only when permitted).
- Analyze website traffic and improve user experience.
- Maintain the security and functionality of our website.
- Comply with legal or regulatory obligations.

4. Legal Basis for Processing (EU/EEA)

Under the **General Data Protection Regulation (GDPR)**, we process personal data on the following bases:

- **Consent** (Art. 6(1)(a)): when you voluntarily provide data or accept cookies.
- **Legitimate interests** (Art. 6(1)(f)): to respond to business inquiries and operate our website securely.
- **Legal obligation** (Art. 6(1)(c)): when required by applicable law.

5. Your Rights under GDPR (EU/EEA Residents)

You have the right to:

- Access, correct, or delete your personal data.
- Object to or restrict processing.
- Request data portability.
- Withdraw consent at any time.
- Lodge a complaint with your local **Data Protection Authority**.

Requests can be sent to **contact@singularity9.com**.

6. US Privacy Rights (CCPA/CPRA)

If you are a **resident of California** or another US state with privacy legislation (e.g., Colorado, Connecticut, Virginia, Utah), you may have the following rights under state law:

- **Right to know** what personal information we collect, use, disclose, or sell.
- **Right to access** your personal data.
- **Right to request deletion** of your personal data.
- **Right to correct** inaccurate information.
- **Right to opt out** of the sale or sharing of personal data (note: we do not sell personal information).
- **Right to non-discrimination** for exercising privacy rights.

To exercise these rights, email **contact@singularity9.com** with the subject line "US Privacy Request."

7. Sharing and Transfers

We do **not sell or rent** personal data to third parties for monetary gain.

However, we may **disclose or share** limited personal data with trusted third parties who help us operate our business, under strict contractual and data protection obligations. These include:

- **Service providers** that host our website, manage customer communications, provide analytics, and support IT operations.
- **Professional advisors** such as auditors, legal counsel, or accountants, when necessary for compliance and protection of our rights.

- **Marketing and analytics providers**, but only if you have provided consent for non-essential cookies or similar technologies.
- **Regulatory and public authorities**, when required by applicable law or government order.

All service providers are bound by agreements requiring them to:

- Use personal data only for agreed purposes.
- Maintain appropriate confidentiality and security.
- Not use the data for their own purposes.

If data is transferred outside the **European Economic Area (EEA)** — for example, to our US-based parent company or to service providers in the United States — we ensure adequate protection through **Standard Contractual Clauses (SCCs)** or other legally recognized mechanisms.

8. Retention and Security

We keep personal data only as long as necessary for the purposes for which it was collected, or as required by law.

Typically:

- Contact form submissions: up to **24 months**
- Marketing communication data: until you unsubscribe or withdraw consent

9. Children's Privacy

Our app is not intended for individuals under the age of 18. We do not knowingly collect personal data from minors. If you believe a child has provided us with data, please contact us to remove it.

10. Updates

We may update this Privacy Policy periodically. Updates will be posted on this page with a revised “Last updated” date.

Significant changes will be communicated via the website or by direct notice where required by law.

For questions regarding these Terms, please contact us at **contact@singularity9.com**.