

# PRIVACY POLICY

---

**This is a customizable starting template, not a finished legal document.** This document type carries significant legal and/or financial consequences and varies substantially by jurisdiction. Having a licensed attorney review it before use is strongly recommended. Replace every **[BRACKETED]** field with your specifics, delete or adapt any clause that does not fit your operation, and have a licensed attorney in the governing jurisdiction review it before you publish or rely on it. CyberSygn is not a law firm and this template is not legal advice.

This Privacy Policy (this "**Policy**") explains how **[COMPANY LEGAL NAME]**, a **[STATE] [ENTITY TYPE, e.g. corporation]** with its principal place of business at **[COMPANY ADDRESS]** ("**Company**," "**we**," "**us**," or "**our**"), collects, uses, discloses, and protects personal information in connection with **[WEBSITE URL / APP NAME / SERVICE]** (the "**Service**"). It applies to individuals who visit, register for, or otherwise interact with the Service ("**you**" or "**User**").

**Recitals.** We respect the privacy of the people who use the Service and are committed to handling personal information responsibly and in accordance with applicable law. This Policy describes the categories of information we process, why we process it, the choices available to you, and how to exercise your rights. By using the Service, you acknowledge that you have read and understood this Policy. Where applicable law requires consent for specific processing, we will obtain that consent separately.

## 1. Scope and Definitions

**1.1 Scope.** This Policy governs personal information we process as a controller of that information in connection with the Service. It does not apply to third-party websites, products, or services that we do not control, even if they link to or from the Service.

**1.2 Personal Information.** "**Personal Information**" means information that identifies, relates to, describes, or could reasonably be linked to an identified or identifiable individual. It does not include de-identified, aggregated, or publicly available information that cannot reasonably be associated with an individual.

**1.3 Processing.** "**Processing**" means any operation performed on Personal Information, including collection, use, storage, disclosure, and deletion.

**1.4 Sensitive Information.** "**Sensitive Information**" means categories of Personal Information that applicable law treats as requiring heightened protection, such as government identifiers, financial account credentials, precise geolocation, health information, and information revealing protected characteristics. We process Sensitive Information only where permitted by law and, where required, with your consent.

## 2. Information We Collect

**2.1 Information you provide.** We collect Personal Information you submit directly, such as your name, email address, mailing address, telephone number, account credentials, payment information, and any content or communications you send to us.

**2.2 Information collected automatically.** When you interact with the Service, we automatically collect certain technical information, including IP address, device and browser type, operating system, pages viewed, referring URLs, and usage timestamps. Some of this information is collected through cookies and similar technologies as described in our **[COOKIE POLICY / Section 2.3]**.

**2.3 Cookies and tracking technologies.** We and our service providers use cookies, pixels, and similar technologies to operate the Service, remember your preferences, measure performance, and, where permitted, support advertising. You can manage cookie preferences through your browser settings or any consent mechanism we make available.

**2.4 Information from third parties.** We may receive Personal Information from third parties such as identity verification providers, analytics vendors, advertising partners, and publicly available sources, which we may combine with information we already hold.

### 3. How We Use Information

**3.1 Purposes.** We process Personal Information to: (a) provide, maintain, and improve the Service; (b) create and manage accounts; (c) process transactions and send related communications; (d) respond to inquiries and provide support; (e) personalize content and recommendations; (f) measure and analyze usage; (g) detect, prevent, and address fraud, security incidents, and misuse; and (h) comply with legal obligations.

**3.2 Legal bases.** Where applicable law (such as the laws of the **[STATE / REGION]**) requires a legal basis for Processing, we rely on one or more of the following: your consent, performance of a contract with you, compliance with a legal obligation, or our legitimate interests in operating and improving the Service in a manner that does not override your rights.

**3.3 Marketing.** We may send you marketing communications about products and services where permitted. You may opt out at any time using the unsubscribe link in the message or by contacting us as described in Section 10.

**3.4 No use inconsistent with this Policy.** We will not use Personal Information for materially different, unrelated, or incompatible purposes without providing notice and, where required, obtaining your consent.

### 4. How We Disclose Information

**4.1 Service providers.** We disclose Personal Information to vendors and service providers that perform functions on our behalf, such as hosting, payment processing, analytics, customer support, and communications, under contracts that require them to protect the information and use it only for the services they provide to us.

**4.2 Business transfers.** If we are involved in a merger, acquisition, financing, reorganization, or sale of assets, Personal Information may be transferred as part of that transaction, subject to the receiving party honoring this Policy or providing notice of any material change.

**4.3 Legal and safety.** We may disclose Personal Information when we believe in good faith that disclosure is necessary to comply with applicable law or legal process, enforce our agreements, or protect the rights, property, or safety of the Company, our Users, or others.

**4.4 With your direction.** We disclose Personal Information to other parties when you direct us to do so or otherwise consent to the disclosure.

**4.5 No sale of Personal Information.** **[SELECT ONE: We do not sell Personal Information. / We may share Personal Information with advertising partners in ways that may be considered a "sale" or "sharing" under certain laws; you may opt out as described in Section 6.]**

### 5. Data Retention and Security

**5.1 Retention.** We retain Personal Information only for as long as necessary to fulfill the purposes described in this Policy, comply with our legal obligations, resolve disputes, and enforce our agreements, after which we delete or de-identify it.

**5.2 Security measures.** We maintain administrative, technical, and physical safeguards designed to protect Personal Information against unauthorized access, use, alteration, and destruction. No method of transmission or storage is completely secure, and we cannot guarantee absolute security.

**5.3 Breach notification.** In the event of a security incident affecting Personal Information, we will notify affected individuals and authorities as and when required by applicable law.

## 6. Your Rights and Choices

**6.1 Rights.** Depending on your jurisdiction, you may have the right to: (a) access the Personal Information we hold about you; (b) correct inaccurate information; (c) delete information; (d) port information to another provider; (e) opt out of certain Processing, including targeted advertising or the sale or sharing of Personal Information; and (f) withdraw consent where Processing is based on consent.

**6.2 How to exercise rights.** You may exercise these rights by contacting us as described in Section 10. We will verify your identity before responding and will respond within the time required by applicable law. We will not discriminate against you for exercising your rights.

**6.3 Appeals.** Where required by applicable law, if we decline a request, you may appeal our decision by contacting us using the information in Section 10, and we will respond within the period the law requires.

**6.4 Authorized agents.** Where the law permits, you may use an authorized agent to submit a request on your behalf, subject to the verification we reasonably require.

## 7. International Data Transfers

**7.1 Cross-border processing.** We may store and process Personal Information in [COUNTRY/REGION] and other locations where we or our service providers operate. These locations may have data-protection laws different from those in your jurisdiction.

**7.2 Transfer safeguards.** Where required by applicable law, we use appropriate safeguards for cross-border transfers, such as standard contractual clauses or other lawful transfer mechanisms, and will provide information about those safeguards on request.

## 8. Children's Privacy

**8.1 Age threshold.** The Service is not directed to children under [AGE, e.g. 13 / 16], and we do not knowingly collect Personal Information from them.

**8.2 Removal.** If we learn that we have collected Personal Information from a child below the applicable age without required parental consent, we will delete it. A parent or guardian who believes a child has provided us information may contact us as described in Section 10.

## 9. Changes to This Policy

**9.1 Updates.** We may update this Policy from time to time. We will post the revised Policy with a new effective date and, where required by law, provide additional notice or obtain consent.

**9.2 Continued use.** Your continued use of the Service after an update takes effect constitutes acknowledgment of the revised Policy, to the extent permitted by applicable law.

## 10. Contact Information

10.1 **How to reach us.** If you have questions about this Policy or wish to exercise your rights, contact us at [PRIVACY EMAIL], [MAILING ADDRESS], or [PHONE].

10.2 **Data protection representative.** [IF APPLICABLE: Our data protection officer or representative is [NAME / CONTACT], reachable at [CONTACT DETAILS].]

10.3 **Supervisory authority.** Where applicable law provides, you may have the right to lodge a complaint with the data-protection or consumer-protection authority in your jurisdiction.

This Policy is published by the Company and is effective as of the date below.

**COMPANY**

---

Signature: \_\_\_\_\_

---

Printed name: [NAME]

---

Title: [TITLE, or N/A for a published policy]

---

Effective date: \_\_\_\_\_

---

*Template provided by CyberSygn. Not legal advice. CyberSygn is not a law firm. Consult a licensed attorney in your jurisdiction before relying on this document.*