

Effective Date: January 2026

Introduction

VAT SYSTEMS ENGINEERING GROUP, LLC (hereinafter referred to as “**VSEG**”, “**we**”, or “**us**”) respect your privacy and are committed to keeping your Personal Data and other data confidential and secure. When you visit our website at rcatoolkit.com or use any tools, templates, or interactive features provided by VSEG (collectively, the “**Products**”) and other services provided by VSEG, we will collect, process, and disclose your information in accordance with this Privacy Policy (the “**Policy**”). This Policy applies to individual users of RCAToolkit products (hereinafter referred to as “**you**”). This Policy will help you understand how we collect, use and disclose your Personal Data and assist you in exercising the privacy rights available to you.

Before accepting this Policy, please read it carefully, especially the terms **marked in bold**. You should pay particular attention to these terms and confirm that you fully understand and agree to them before using the Product and other services. If you or your legal guardian do not agree with any part of this Policy, you should immediately cease using the Product and other services. If you are unable to accurately understand or agree to any part of this Policy, please do not access, use the Product, or any other services provided by VSEG. Your confirmation by clicking through the website, actual use of the Product or other services provided by VSEG shall be deemed to indicate that you have read and fully understood the contents of this Policy and agree to be bound by it.

If you have any questions, comments, or suggestions regarding the content of this Policy, you may contact us using the various means of contact provided within this Policy.

This Policy will help you understand:

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Appendix: Additional Terms for Applicable Privacy Law

PART A - ADDITIONAL TERMS FOR EEA, UK & SWITZERLAND DATA PROTECTION LEGISLATION

PART B - ADDITIONAL TERMS FOR US STATE PRIVACY LAWS

1. Scope of this Privacy Policy

This Privacy Policy applies to **all users** of VSEG's products and services, including:

- **Browsing users (visitors)** who access our website or platform.
- **Registered users** who create accounts and interact with our services.

By **agreeing to this Privacy Policy and using our products and services**, you acknowledge and accept the terms outlined in this policy.

1.1 When This Policy Does Not Apply

This Privacy Policy **does not apply** to the following:

1. Third-Party Services and Websites

- If you access third-party websites, applications, or services **through our platform**, any data collected by those third parties **is governed by their own privacy policies**.
- We **do not control, endorse, or assume responsibility** for how third-party providers handle your personal data.

2. Third-Party Advertisers

- If you interact with advertisements displayed in our products and services, any data collected **is subject to the advertiser's own privacy policies**.
- We **are not responsible for the privacy practices** of advertisers or third-party tracking technologies.

1.2 Your Responsibility When Using Third-Party Services

If you **choose to share your personal data with a third party** while browsing their websites or using their services, you acknowledge that:

- Your data **is subject to the third party's privacy statement, not ours**.
- We **are not liable** for how third parties use, store, or disclose your information.
- Before using any third-party services, **you should review their privacy policies** and assess their data protection practices.

If you **access a third-party service through a link, integration, or referral from Vat Systems Engineering Group**, this **does not mean we endorse or guarantee** their privacy practices. **Use third-party services at your own discretion**.

2. Definitions

For the purposes of this Privacy Policy, the following definitions apply:

2.1 Personal Data

Any **information relating to an identified or identifiable natural person** ("Data Subject"), including but not limited to names, email addresses, phone numbers, IP addresses, device identifiers, location data, and any other information that can be used to directly or indirectly identify an individual.

2.2 Applicable Privacy Law

Any **national, federal, European Union, state, provincial, or other privacy, data security, or data protection law or regulation** governing the processing of Personal Data. This includes but is not limited to:

- **General Data Protection Regulation (GDPR)** (Regulation (EU) 2016/679)
- **California Consumer Privacy Act (CCPA) / California Privacy Rights Act (CPRA)**
- **U.S. state privacy laws** (e.g., Virginia, Colorado, Connecticut, and Utah privacy laws)
- **Other applicable international data protection laws**

2.3 Subprocessor(s)

A **third-party service provider** engaged by VSEG (as the **Processor**) to process Personal Data on behalf of the **Controller** (the user or their organization) in order to provide services, support, or infrastructure.

2.4 Anonymized Data

Data that has been **irreversibly altered** so that it **can no longer be attributed to an individual**, even when combined with additional data, and cannot be re-identified using reasonable means. Anonymized Data is **not considered Personal Data** under privacy laws.

2.5 Product Services

The various **features, tools, and capabilities** provided by RCAToolkit to users through the rcatoolkit.com website, including but not limited to:

- **RCA Templates** — Free downloadable root cause analysis templates including 5 Whys, Fishbone (Ishikawa), 8D Report, and RCA formats available in PDF and Word (.docx) formats.
- **Interactive RCA Tools** — Browser-based tools for building 5 Whys analyses, Fishbone diagrams, and 8D reports (current and planned future tools).
- The rcatoolkit.com website, including product pages, documentation, and contact forms.

2.6 EU GDPR

Refers to **Regulation (EU) 2016/679**, which governs the **protection of natural persons** regarding the processing of Personal Data and the **free movement of such data**. The GDPR applies to **organizations processing EU residents' data**, regardless of where the organization is located.

2.7 Additional Data Protection Terms

Unless otherwise defined in this Privacy Policy, the following terms shall have the meaning provided under **Applicable Privacy Law** or, where no such law applies, the **EU GDPR**:

- **“Data Subject”** – The individual whose Personal Data is being processed.
- **“Processing”** – Any operation performed on Personal Data, such as collection, storage, modification, sharing, or deletion.
- **“Controller”** – The entity (e.g., the user or their organization) that determines the purpose and means of Personal Data processing.
- **“Processor”** – The entity (e.g., VSEG) that processes Personal Data **on behalf of the Controller**.

3. Processing of Personal Data

3.1 Roles of the Parties

If you are a **corporate/organizational user** and use “RCAToolkit” (“Services”) to process Personal Data, you acknowledge that:

- **You (the organization) act as the “Controller”**, determining the means and purposes of data processing.
- **We VSEG act as the “Processor”**, processing Personal Data on your behalf in accordance with the **Data Processing Addendum (DPA)** and applicable privacy laws.

As the **Controller**, you are responsible for:

- Ensuring that **all Personal Data you provide or collect has a valid legal basis** for processing (e.g., consent, contractual necessity, legitimate interest).
- Informing and obtaining **appropriate consents from end-users**, where required by law.

If you are an **individual user**, we act as the **Controller** for your Personal Data and determine how it is processed as described in this Privacy Policy.

3.2 Personal Data We Collect

RCAToolkit is designed to collect as little personal data as possible. Below is a complete description of what we collect and why.

3.2.1 Email Address (Optional)

If you choose to subscribe to our mailing list or use the email capture feature on rcatoolkit.com, you provide an email address for the purpose of receiving product updates, new template announcements, and relevant communications from VSEG. This email address is processed via our

email service provider (Resend) and is **not shared with third parties for marketing purposes**. You may unsubscribe at any time via the link in any email we send.

3.2.2 Email Address (Optional)

When you visit rcatoolkit.com, our hosting provider and analytics tools may automatically collect standard server log data including IP address, browser type, referring page, and pages visited. This information is used solely for security monitoring and aggregate traffic analysis via Google Analytics. We do not use this data to identify individual users.

3.2.3 Locally Cached Results

Certain interactive tools on RCAToolkit may store your in-progress work locally on your device using browser storage (localStorage or sessionStorage). This data never leaves your device and is not accessible to VSEG. You can clear this data at any time by clearing your browser's local storage.

3.2.4 Website Usage Data

When you visit rcatoolkit.com, our hosting provider may automatically collect standard server log data including IP address, browser type, referring page, and pages visited. This information is used solely for security monitoring and aggregate traffic analysis. We do not use this data to identify individual users.

3.2.5 What We Do Not Collect

RCAToolkit does NOT collect the following: your browsing history, the content of any root cause analysis documents or data you create using our templates or tools, proprietary engineering or manufacturing data entered into any interactive tool, your location, payment information (unless purchasing a premium product via Stripe), account credentials, or any personal information beyond what is described in Sections 3.2.1–3.2.4 above.

3.3 How We Process Your Personal Data

We process your Personal Data for the following purposes:

1. **Providing Services** – Account creation, feature access, customer support.
2. **Improving User Experience** – Improving product quality. Aggregate, anonymized usage patterns (e.g., which templates are most downloaded or used) may be used to improve the product.
3. **Security & Fraud Prevention** – Protecting accounts, detecting abuse, enforcing terms.
4. **Legal Compliance** – Responding to legal requests, regulatory obligations.
5. **Marketing & Advertising** – If you consent, we may send personalized offers.

If we process your data **beyond the original purpose**, we will **notify you and request additional consent**.

3.4 Legal Bases for Processing

Under **GDPR, CCPA, and other privacy laws**, we process Personal Data based on the following **legal justifications**:

- **Your Consent** – For marketing, non-essential data collection, or AI training opt-ins.
- **Contractual Necessity** – To provide requested services and fulfill agreements.
- **Legitimate Interests** – To improve services, prevent fraud, and ensure security.
- **Legal Obligations** – To comply with applicable laws and law enforcement requests.
- **Public Interest or Vital Interests** – For safety, security, and legal compliance.

If you **withdraw consent**, it does not affect the **lawfulness of processing** conducted before the withdrawal.

3.5 How We Share Your Personal Data

3.5.1 Sharing Principles

We **do not sell or rent** your Personal Data. We only share it:

- **With your explicit consent.**
- **As required by law** (court orders, government regulations).
- **To protect public safety** (e.g., fraud prevention, security threats).
- **With authorized service providers** who assist in providing the Services.

We ensure that **all third-party recipients** follow **strict data protection agreements**.

3.5.2 Service Providers & Subprocessors

We share Personal Data with third-party **service providers ("Subprocessors")** who assist with:

- **Vercel, Inc.** — Serverless website and API hosting. Standard usage data may pass through Vercel's infrastructure. Vercel does not store or retain personally identifiable data beyond the duration of each request.
- **Stripe, Inc.** — Payment processing for premium template bundles and paid tools. Stripe handles all payment credentials and is bound by its own privacy and PCI-DSS security standards. We do not store, log, or retain your credit card or payment information. Stripe's privacy policy is available at stripe.com/privacy.

- **Google Analytics** — Website traffic and usage analysis. Aggregate, anonymized usage data is collected to help improve site performance and content. Google’s privacy policy is available at policies.google.com/privacy.
- **Resend** — Transactional and marketing email delivery. If you submit your email address via our email capture form, your address is transmitted to Resend to deliver communications. This data is not stored or used for any other purpose.

Each provider **is contractually bound** to use data only for **authorized purposes** and must comply with **strict data security requirements**.

3.5.3 Third Parties & Affiliates

We may share necessary data with **affiliates, business partners, or legal advisors** to:

- Facilitate product integrations or interoperability.
- Investigate fraud, abuse, or security risks.
- Manage business restructuring (e.g., mergers, acquisitions).

We ensure any transfers follow **legal and contractual safeguards**.

3.5.4 Public Disclosure

We will **only disclose Personal Data publicly** if:

- You **explicitly consent** to publication (e.g., testimonials, case studies).
- Required by **law, legal process, or regulatory action**.
- Necessary to **protect public safety, enforce rights, or prevent harm**.

4. Cookies and Similar Technologies

4.1 What Are Cookies?

Cookies are **small data files** stored on your **computer, tablet, or mobile device** to enhance website functionality and improve your browsing experience. Cookies typically contain:

- A **unique identifier**
- The **website’s domain name**
- **Small amounts of user-specific data**

Vat Systems Engineering Group can only access **our own Cookies** and does not track third-party Cookies unless explicitly stated.

4.2 How We Use Cookies

We use Cookies for the following purposes:

Essential Cookies (*Strictly Necessary*)

These Cookies are **required** for the website to function properly and cannot be disabled in our systems. They help:

- **Authenticate users** and prevent fraudulent access.
- **Enable core website functions**, such as page navigation and security.

Performance & Analytics Cookies (*Optional – User Consent Required in Some Jurisdictions*)

These Cookies collect data about **how you interact with our website**, helping us:

- Track **website traffic and performance metrics**.
- Analyze **user behavior and engagement**.
- Identify **areas for improvement** in functionality and content.

Functional Cookies (*Enhance User Experience – Optional*)

These Cookies **remember your preferences**, such as:

- **Language settings**
- **Login credentials (if enabled)**
- **Customized display preferences**

Advertising & Tracking Cookies (*Requires User Consent – Optional*)

These Cookies allow us to:

- Track **the effectiveness of our advertisements**.
- Personalize ads **based on your interests**.
- Prevent **excessive ad repetition**.

If you choose **not to allow** these Cookies, you may still see ads, but they will not be **personalized**.

4.3 Your Rights & Cookie Management

You have full control over how Cookies are stored and used on your device. You can:

- **Manage or disable Cookies in your browser settings**.
- **Clear stored Cookies at any time**.
- **Opt out of certain tracking technologies** via our **Cookie Consent Manager** (if available).

⚠ **Important Notice:** Disabling Cookies may affect website functionality, including login persistence and service preferences.

To adjust your browser settings, refer to:

- **Google Chrome:** Manage cookies in Chrome
 - **Mozilla Firefox:** [Cookies and site data settings](#)
 - **Microsoft Edge:** [Managing cookies in Edge](#)
 - **Apple Safari:** [Managing cookies on Mac](#)
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4.4 Similar Technologies We Use

In addition to Cookies, we may also use:

Web Beacons & Pixel Tags

- **Web beacons (tracking pixels)** are small, invisible images embedded into emails or web pages that help us analyze engagement (e.g., whether emails are opened).
- **Pixel tags** track how you interact with our emails and ads, allowing us to optimize future communications.

Click-Tracking Links

Some **emails we send contain tracking links** that allow us to:

- Measure **email engagement rates**.
- Identify which **content is most useful to you**.

Opt-Out: If you do not want your activities tracked in this way, you can **unsubscribe from our mailing list at any time**.

4.5 Security Considerations for Cookies & Tracking Technologies

Due to technological limitations, **it is not possible to completely prevent malicious activities**, such as:

- **Phishing emails impersonating VSEG.**
- **Fraudulent links disguised as official communications.**

Security Tip: Before clicking any links in an email, verify that the sender is **legitimate**. If you suspect phishing, report the email to info@vatsystemsengineering.com.

5. Data Security and Retention

5.1 Commitment to Data Security

VSEG takes **data security seriously** and implements **industry-standard safeguards** to protect your Personal Data against:

- **Unauthorized access or disclosure**
- **Modification or destruction**
- **Loss, theft, or cyberattacks**

We use the following **security measures**:

- **Encryption & Pseudonymization** – Sensitive Personal Data is encrypted in transit and at rest.
- **Access Control** – Only authorized personnel can access Personal Data based on a **least privilege policy**.
- **Network Security Protections** – Firewalls, intrusion detection, and security monitoring systems.
- **API Rate Limiting** – Our backend API enforces per-IP rate limits to prevent automated abuse and protect against unauthorized bulk extraction of data. Requests that exceed these limits are rejected with an appropriate error response.
- **Employee Training** – Staff undergo **regular privacy and security awareness training**.

Despite our efforts, **no system is completely secure**. You are encouraged to take **proactive measures** to protect your data, including:

- Using **strong, unique passwords** and updating them regularly.
 - **Avoiding sharing sensitive data** over unencrypted channels.
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5.2 Data Retention Policy

We **only retain Personal Data for as long as necessary** to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law.

- **Upon expiration of the retention period**, we will:
 - **Permanently delete** the data, or
 - **Anonymize the data** so it can no longer be linked to you.

Retention periods vary depending on:

- **The type of data collected**
- **Legal requirements (e.g., tax, compliance, litigation holds, or regulatory obligations)**
- **Business purposes (e.g., fraud prevention, security monitoring, and dispute resolution)**

If we retain data **for compliance or legal reasons**, we will ensure that access is **restricted** and **data is securely stored**.

5.3 Security Best Practices for Users

Since **no online system is 100% secure**, we strongly recommend:

- **Using multi-factor authentication (MFA)** where available.
- **Avoiding public Wi-Fi networks** when accessing accounts with sensitive data.
- **Not sharing account credentials** or login details with others.

If you suspect **unauthorized access to your account**, **contact us immediately** via **info@vatsystemsengineering.com**.

5.4 Data Breach Response & Notification

In the event of a **Personal Data security breach** (e.g., data leakage, loss, unauthorized access), we will:

1. **Investigate the incident** and mitigate risks as quickly as possible.
2. **Notify affected users without undue delay**, in accordance with **Applicable Privacy Laws**, including:
 - A description of the breach and its potential impact.
 - The steps we are taking to **contain and mitigate** the breach.
 - Recommendations on how you can **protect your data**.
3. **Report the incident to regulatory authorities** where required by law.

If direct user notification **is not feasible**, we will **issue a public notice via our website or other official communication channels**.

5.5 Security Considerations When Using Third-Party Software

While using our Services, you may **interact with third-party social networks, messaging apps, or other embedded services**.

⚠ **Be cautious when sharing sensitive information** via third-party apps, as we **cannot guarantee their encryption or security measures**.

To enhance security:

- **Ensure third-party platforms are reputable** before sharing data.
 - **Avoid sharing sensitive data via unsecured email, chat, or SMS.**
 - **Regularly review and update your security settings** on third-party platforms.
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5.6 Data Handling Upon Service Termination

If VSEG **ceases operations**, we will:

1. **Immediately stop collecting new Personal Data.**
 2. **Notify users of service termination** through direct notifications or public announcements.
 3. **Delete or anonymize all retained Personal Data**, unless legally required to retain certain records.
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5.7 Data Storage & Processing Locations

We store and process Personal Data in secure **cloud data centers**.

Primary Data Storage

- User Personal Data is **stored in United States** using **Amazon Web Services (AWS)** or equivalent secure cloud providers.

AI Features Data Storage

- If you use AI-powered features, we may **store inputs and generated outputs** in **the United States, Singapore, or other secure jurisdictions** to ensure optimal performance.

If international data transfers occur, we **implement safeguards** such as:

- **Standard Contractual Clauses (SCCs)** for EU users.
- **Compliance with regional data protection laws** (GDPR, CCPA, etc.).
- **Encryption and pseudonymization techniques** to protect sensitive data.

6. Data Subject Rights

You have rights and choices regarding your **Personal Data**, as provided under **Applicable Privacy Law** (e.g., **GDPR, CCPA, CPRA**).

- If you are an **individual user**, we **directly** respond to your requests within the **legal timeframe**.
- If you are an **end-user of a corporate/organizational account**, please **contact your organization** for data-related requests. We will **assist your organization** in processing the request.

6.1 Right to Access Your Personal Data

You have the right to access and review your **Personal Data** that we process.

You can access your information in the following ways:

- **Account Information** – Log in to your account to view, manage, update, or delete personal details.
- **Usage Information** – You can request details on how your data has been processed via **info@vatsystemsengineering.com**.
- **Other Information Requests** – If you need additional data that is not available through self-service options, contact us via **info@vatsystemsengineering.com**.

To ensure **data security**, we may require **identity verification** before processing access requests.

6.2 Right to Rectify Your Personal Data

You may correct or update your **inaccurate or incomplete Personal Data**, subject to **identity verification**.

- **Self-Service Updates** – Log in to your account to correct general details.
- **Requesting Changes** – For changes that **require manual verification**, such as real-name authentication updates, contact **info@vatsystemsengineering.com**.

⚠ For security reasons, some registration details may not be modifiable (e.g., primary email address associated with account verification).

6.3 Right to Delete Your Personal Data

You can request **deletion of your Personal Data** in these circumstances:

The **purpose for collection has been fulfilled**, or it is **no longer necessary**.

You **withdraw consent**, and there is **no other legal basis** for processing.

Your data was **processed unlawfully**.

We **no longer provide** the related products/services.

Any other legal circumstances outlined in **Applicable Privacy Law**.

How We Handle Deletion Requests:

- We **delete** or **anonymize** Personal Data within a **reasonable timeframe**.
- We **notify any third-party recipients** of your data to also delete it, unless legal retention is required.

Exceptions: If retention is legally required (e.g., for security, fraud prevention, legal obligations), we **securely store** the data until it can be deleted.

6.4 Right to Copy Your Personal Data

You can request a **copy of your Personal Data**, including:

- **Basic account details**
- **Identity verification data**
- **Usage history and interactions**

To request a copy, contact us at **info@vatsystemsengineering.com**. **Identity verification** is required before processing.

6.5 Right to Withdraw Consent

If you previously **consented to data processing**, you may withdraw consent at any time.

How to withdraw consent:

- Modify app **permissions** (e.g., location, camera access) via **device settings**.
- Adjust consent preferences in your **account settings**.
- Contact **info@vatsystemsengineering.com** for assistance.

⚠ Withdrawing consent may impact your ability to use certain services. However, past processing remains **lawful prior to withdrawal**.

6.6 Right to Cancel Your Account

You may cancel your account by:

- **Contacting your organization (for enterprise users).**
- **Requesting cancellation via info@vatsystemsengineering.com.**

Before account deletion, consider the following:

- If you have **active paid subscriptions**, immediate deletion **may not be available**.
- Once deleted, all **data, settings, and history are permanently removed**.

⚠ If you use a third-party login (e.g., Google, Facebook), you must also cancel your account with that provider.

6.7 Right to Restrict Processing of Your Personal Data

You can request **temporary restriction** of your data processing when:

You are **contesting the accuracy** of your data.

The processing is **unlawful**, but you prefer restriction instead of deletion.

The data is required **for legal claims**, and you request continued storage.

You have **objected to processing**, and we are reviewing your request.

Contact info@vatsystemsengineering.com to request restrictions.

6.8 Right to Object to Processing of Your Personal Data

You may object to our processing of your data **if processing is based on:**

Legitimate Interests (ours or third parties)

Public Interest Tasks

Scientific or historical research purposes

We will **review and assess** your objection request. Processing will **stop** unless we demonstrate **overriding legal grounds**.

Submit objections via info@vatsystemsengineering.com, including details on why processing impacts you.

6.9 Right to Data Portability

You may request a **structured, machine-readable format** copy of your Personal Data to:

- **Download for personal use.**
- **Transfer to another service provider.**

Contact info@vatsystemsengineering.com for portability requests.

6.10 Right to Lodge a Complaint

If you believe your **privacy rights have been violated**, you have the right to:

- File a complaint with **your local Data Protection Authority**.
- Take legal action in a **court of competent jurisdiction**.
- Contact us at **info@vatsystemsengineering.com**, and we will assist in resolving your concerns.

6.11 Notification of Service Termination & Data Deletion

If VSEG **discontinues its products or services**, we will:

1. **Notify users at least 15 days in advance** via website announcements or direct emails.
2. **Stop collecting new data** and securely **delete or anonymize** existing Personal Data.

6.12 Right to Understand Automated Processing Decisions

Some features may use **automated decision-making algorithms** (e.g., **AI-based recommendations**).

If you believe an **automated decision has a significant impact on your rights**, you may request:

- An **explanation of how the decision was made**.
- **Human intervention** for further review.

Submit requests via **info@vatsystemsengineering.com**.

6.13 How We Respond to Data Rights Requests

For security reasons, we may:

- **Require written verification of your identity**.
- **Deny requests that are excessive, unreasonable, or impractical** (e.g., requiring extensive system changes).

Fees:

- **No charge** for reasonable requests.

- We may charge a **reasonable fee** for repetitive or excessive requests.

Exceptions (We Cannot Fulfill Requests If):

The request conflicts with **national security or law enforcement activities**.

The request involves **trade secrets or intellectual property risks**.

The request would harm **the rights of other individuals**.

Contact info@vatsystemsengineering.com to exercise any of your rights.

7. Younger Users

7.1 Age Restrictions for Account Creation

Our products and services are **primarily designed for adults**. **Minors under the age of 16 may not create an account** or use our services **without parental or guardian consent**.

If you are a **minor under the age of 16**, you must:

- Have **your parent or guardian review this Privacy Policy**.
 - **Obtain their consent** before using our services or providing any Personal Data.
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7.2 Collection and Use of Minors' Data

If we collect **Personal Data from minors** with **verified parental or guardian consent**, we will:

- **Only process, share, or transfer this data in accordance with applicable laws**.
 - **Obtain explicit consent** from a parent/guardian **before any additional processing**.
 - **Ensure that minors' data is protected** and only used for necessary purposes.
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7.3 Deletion of Minors' Data

If we **accidentally collect data from a minor without verified parental consent**, we will:

1. **Delete the data as soon as possible**.
2. **Ensure no further collection occurs**.
3. **Not be liable for any loss incurred due to such deletion**.

If you believe we have collected a minor's data without consent, please contact us immediately at info@vatsystemsengineering.com. We will take immediate action.

8. Our Global Operations and Data Transfers

8.1 Where We Store & Process Data

We store and process **Personal Data** in **secure cloud locations**, including:

- **United States**

However, your data **may be transferred internationally** in the following cases:

Required by Applicable Privacy Law

You provide explicit consent for data transfer

You initiate a cross-border transaction (e.g., international payments)

8.2 How We Protect Your Data in International Transfers

When transferring data across borders, we ensure **adequate protection** by:

- Implementing **Standard Contractual Clauses (SCCs)** for international transfers.
- Adhering to **GDPR, CCPA, and other privacy regulations**.
- Using **encryption and access controls** to protect sensitive information.

For more details on international data transfers, contact us at info@vatsystemsengineering.com.

9. Privacy Policy Updates

9.1 Why This Policy May Change

We regularly update this Privacy Policy **to reflect**:

- **Changes in our services** (e.g., new features, AI processing updates).
 - **Regulatory compliance updates**.
 - **User feedback and security improvements**.
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9.2 No Reduction of Your Rights Without Consent

We will **never reduce your privacy rights** under this Policy **without your explicit consent**.

Changes will be:

Posted on our website.

Clearly communicated via email or in-app notifications for major updates.

9.3 Notification of Major Changes

For **significant changes**, we will:

- Provide **prominent notice** (e.g., pop-up notifications, website announcements).
- Allow you **reasonable time to review the changes** before they take effect.
- Give you the option to **stop using our services** if you **disagree** with the new terms.

If you continue to use our services after the updated Privacy Policy takes effect, you accept the revised terms.

9.4 What Constitutes a "Material Change"?

Material changes include, but are not limited to:

Significant updates to how we **process Personal Data** (e.g., new AI features).

Changes in our corporate structure (e.g., mergers, acquisitions).

New data-sharing policies that affect **who receives your data**.

New rights for users regarding their Personal Data.

Changes to our contact information for privacy concerns.

High-risk findings in our Data Protection Impact Assessments (DPIA).

For questions about this Privacy Policy or updates, contact us at info@vatsystemsengineering.com.

10. Contact Us

If users have any questions or comments regarding the content of this Policy, or regarding the practice and operation of this Policy, please contact us. You can send your questions to info@vatsystemsengineering.com. If you would like to contact our Data Protection Officer, you may contact us at the email and address above.

In general, we will respond to your request within one (1) month. In the event of exceptional circumstances, we may delay our response to you, with an appropriate explanation, but this delay will not exceed three (3) months.

If you are not satisfied with our response, especially if you believe that our Personal Data processing behavior has harmed your legitimate rights and interests, you can also seek a solution by filing a lawsuit with the court at the domicile or place of registration of VAT SYSTEMS ENGINEERING GROUP, LLC.

Appendix: Additional Terms for Applicable Privacy Law

PART A - Additional Terms for EEA, UK & Switzerland Data Protection Legislation

This section applies **only to users located in the European Economic Area (EEA), the United Kingdom (UK), or Switzerland.**

VSEG complies with:

- **The General Data Protection Regulation (GDPR) (EU) 2016/679** for EEA users.
- **The UK General Data Protection Regulation (UK GDPR)** for UK users.
- **The Swiss Federal Act on Data Protection (FADP)** for Swiss users.

These laws govern **how we process and protect your Personal Data.**

In the event of a conflict between this Appendix and the General Privacy Policy, this Appendix prevails.

1. Lawful Basis for Processing

Under GDPR, UK GDPR, and Swiss law, we process Personal Data **only if we have a lawful basis.**

The lawful bases we rely on include:

Consent – When you give explicit consent (e.g., marketing emails, AI model training).

Contractual Necessity – When processing is required to fulfill a contract with you.

Legal Obligation – When we are legally required to process data (e.g., fraud prevention).

Legitimate Interests – When we have a compelling interest that does not override your rights.

If we rely on consent, you have the right to withdraw it at any time.

2. Your GDPR & UK GDPR Rights

Under **GDPR, UK GDPR, and Swiss privacy laws**, you have the following rights:

2.1 Right to Access – You may request a copy of your Personal Data.

2.2 Right to Rectification – You can request corrections to inaccurate or incomplete data.

2.3 Right to Erasure (“Right to be Forgotten”) – You can request deletion of your data under specific circumstances.

2.4 Right to Restrict Processing – You can request that we limit how we process your data.

2.5 Right to Data Portability – You can request a copy of your data in a machine-readable format.

2.6 Right to Object – You may object to processing based on **legitimate interests** or **direct marketing**.

2.7 Right Not to Be Subject to Automated Decision-Making – You can request **human intervention** in AI-driven decisions.

To exercise these rights, contact us at info@vatsystemsengineering.com.

3. Data Transfers Outside the EEA, UK, or Switzerland

If we transfer your Personal Data outside the EEA, UK, or Switzerland, we ensure that:

The recipient country has an "adequacy decision" from the European Commission.
We use Standard Contractual Clauses (SCCs) approved by the European Commission.
If no other safeguards apply, we obtain your explicit consent before transferring data.

To further protect your data, we use:

- **Encryption techniques** during transfer.
- **Anonymization or pseudonymization** where possible.

For more details on international transfers, contact us at info@vatsystemsengineering.com.

4. Data Protection Officer (DPO) & Supervisory Authority

As a small business, VSEG does not have a formally appointed Data Protection Officer. Privacy-related inquiries and GDPR requests are handled directly by VSEG management. You may contact us at info@vatsystemsengineering.com for any privacy concerns.

Supervisory Authority: If you believe we are **processing your data unlawfully**, you have the right to **lodge a complaint** with your local Data Protection Authority:

- **EU Users** – [Find your national Data Protection Authority](#)
- **UK Users** – Information Commissioner's Office (ICO): www.ico.org.uk
- **Swiss Users** – Swiss Federal Data Protection and Information Commissioner (FDPIC): www.edoeb.admin.ch

To submit a privacy request, email: info@vatsystemsengineering.com.

PART B - Additional Terms for US State Privacy Laws

This section applies **only to users located in the state of California, U.S.** unless stated otherwise.

We comply with the **California Consumer Privacy Act of 2018 (CCPA)**, as amended by the **California Privacy Rights Act of 2020 (CPRA)**, and its implementing regulations.

In the event of a conflict between this Appendix and the General Privacy Policy, this Appendix prevails.

1. Sale and Sharing of Personal Data (Last 12 Months)

Under CCPA & CPRA:

- **“Selling”** means providing **Personal Data to a third party** in exchange for **monetary compensation**.
- **“Sharing”** means providing **Personal Data to a third party** for **cross-context behavioral advertising**, even if no money is exchanged.

1.1 Sale of Personal Data

We do not sell your Personal Data.

If we ever **decide to sell Personal Data in the future**, we will:

Update this Appendix accordingly.

Provide you with advance notice and an opt-out option.

1.2 Sharing of Personal Data

We may share Personal Data for cross-context behavioral advertising (see Section 3 of the General Policy).

We do not knowingly share data of users under 16 years old but **cannot guarantee age verification** for all users.

To opt out of data sharing, contact us at info@vatsystemsengineering.com.

2. Data Subject Rights (CCPA & CPRA)

Under **CCPA & CPRA**, California users have the following **privacy rights**:

2.1 Right to Be Informed

You have the right to know:

- What **Personal Data we collect** about you.
- The **categories of sources** of data collection.
- The **business or commercial purpose** for collection.
- The **categories of third parties** who receive your data.
- The **specific pieces of Personal Data collected**.

See **Sections 3.2 & 3.3** of the General Terms for details.

2.2 Right to Access Your Personal Data

You may request a **copy of your Personal Data** processed by us.

See **Section 6.1** of the General Terms for how to exercise this right.

2.3 Right to Delete Personal Data

You may request deletion of your Personal Data.

See **Section 6.3** of the General Terms for how to exercise this right.

Exceptions: We may deny deletion requests if retention is necessary for:

- **Completing transactions** or fulfilling service obligations.
- **Ensuring security and fraud prevention.**
- **Debugging errors and maintaining system integrity.**
- **Exercising legal rights (e.g., free speech, compliance with the California Electronic Communications Privacy Act, legal obligations, research, etc.).**

If your request is denied, we will **inform you of the reason.**

2.4 Right to Correct Inaccurate Data

You may request **correction of inaccurate or outdated Personal Data.**

See **Section 6.2** of the General Terms for how to exercise this right.

2.5 Right to Opt-Out of Selling or Sharing Personal Data

US residents may opt out of the sharing of Personal Data for cross-context advertising.

To opt out, contact us at **info@vatsystemsengineering.com.**

We do not sell customer Personal Data.

2.6 Right to Equal Services & Non-Discrimination

You will not be discriminated against for exercising your privacy rights under CCPA & CPRA.

This means we will NOT:

Deny you products or services.

Charge different prices or impose penalties.

Offer lower quality of service.

Imply that you will receive different services for exercising your rights.

However, restricting certain data processing may limit product functionality.

2.7 Right to Request a Status Report on Privacy Requests

You may request a report on how we process privacy requests.

Contact info@vatsystemsengineering.com to request details.