# **Privacy Policy**

Effective Date: October 7, 2025

Last Updated: October 7, 2025

### 1. Introduction

Welcome to **evolv.training** ("we", "us", "our"). We are committed to protecting your privacy and handling your personal data responsibly.

This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you use the evolv.training website, mobile application, and related services (collectively, the "Service").

By using our Service, you agree to the data practices described in this Privacy Policy. If you do not agree, please discontinue use of our Service.

### 2. Information We Collect

#### 2.1 Personal Information You Provide

We may collect personal information that you provide directly to us, including:

- Account information: name, email address, username, password, phone number.
- **Profile details:** age, gender, preferences, profile photo, and other optional data.
- **Payment information:** billing address, transaction details, and payment method (handled securely via third-party payment processors).
- **Communications:** messages, feedback, survey responses, and customer support inquiries.

#### 2.2 Automatically Collected Information

When you use the Service, we may automatically collect:

- Device data (type, model, operating system, version).
- IP address, language settings, and time zone.
- Usage data (features accessed, session length, interactions, crash logs).
- Analytics data via cookies and SDKs (e.g. Google Analytics or similar tools).

#### 2.3 Location Data (Optional)

If you enable location-based features, we may collect approximate or precise location information. You can disable this in your device settings.

#### 2.4 Cookies and Tracking Technologies

We use cookies and similar technologies to:

- Authenticate and maintain user sessions.
- Store preferences and improve functionality.
- Analyze site usage and performance.
- Support marketing and advertising (where legally permitted).

### 3. How We Use Your Information

We use the collected information for purposes such as:

- Operating, maintaining, and improving the Service.
- Processing transactions and managing your account.
- Personalizing content and user experience.
- Communicating updates, support messages, and administrative notices.

- Sending promotional or marketing materials (only with your consent).
- Detecting, preventing, and responding to fraudulent or illegal activity.
- Complying with legal obligations.

# 4. Legal Bases for Processing (GDPR / EEA Users)

For users in the **European Economic Area (EEA)**, the **UK**, or similar jurisdictions, we rely on the following legal bases:

- Performance of a contract to deliver services you request.
- **Consent** for marketing, analytics, and optional features.
- **Legitimate interests** to enhance security, improve the Service, and prevent misuse.
- **Legal obligation** to comply with applicable laws and regulations.

## 5. Sharing of Information

We may share your personal data in the following ways:

- **Service providers and partners** who perform services such as hosting, payment processing, analytics, or customer support on our behalf.
- Legal requirements if required by law, subpoena, or government authority.
- Protection of rights to enforce our terms, prevent fraud, or protect our users.
- **Business transfers** in the event of a merger, sale, or acquisition.

We do not sell your personal information to third parties for their own marketing purposes.

#### 6. Data Retention

We retain personal data only for as long as necessary to:

- Provide and improve our Service,
- Comply with legal and accounting obligations,
- Resolve disputes and enforce agreements.

Afterward, we securely delete or anonymize the data.

# 7. Security of Your Information

We implement appropriate technical and organizational measures to protect your data, including:

- Encryption of data in transit (HTTPS) and at rest where applicable.
- Access controls and authentication mechanisms.
- Regular system monitoring and updates.

Despite these measures, no method of transmission or storage is completely secure, and we cannot guarantee absolute protection.

### 8. Your Rights

Depending on your jurisdiction, you may have the following rights:

- Access: request a copy of your data.
- Rectification: correct inaccurate or incomplete information.
- Erasure: request deletion of your data ("right to be forgotten").
- Restriction: limit how we process your data.

- Portability: receive your data in a machine-readable format.
- **Objection:** object to processing for certain purposes.
- Withdraw consent: if processing is based on consent.
- Lodge a complaint: with your local data protection authority.

You can exercise these rights by contacting us at **admin@evolv.training**. We may verify your identity before processing your request.

### 9. Children's Privacy

Our Service is **not intended for children under 13** (or the applicable minimum age in your country).

We do not knowingly collect data from children. If we discover such data, we will promptly delete it.

### 10. International Data Transfers

Your data may be transferred to and processed in countries outside your own, including the United States.

We ensure such transfers comply with applicable legal requirements, including the use of **Standard Contractual Clauses (SCCs)** where appropriate.

# 11. Third-Party Links

Our Service may include links to third-party websites or apps. We are not responsible for their privacy practices or content. Please review their privacy policies before engaging.

# 12. Cookies and Similar Technologies

We use cookies to:

- Maintain functionality and user sessions.
- Analyze traffic and usage.
- Support personalization and marketing.

You can adjust cookie preferences in your browser or device settings. Disabling certain cookies may affect performance or features.

# 13. Updates to This Policy

We may modify this Privacy Policy from time to time. Updates will be posted with a revised "Last Updated" date.

Significant changes will be communicated via email or app notification. Your continued use of the Service after updates constitutes acceptance.

#### 14. Contact Us

If you have any questions, requests, or complaints, please contact:

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