

Kustmann Consult

Privacy Policy

The privacy policy is effective May 1, 2021.

Last updated May 1, 2021

At Kustmann Consult OÜ (“Kustmann Consult”) we value the trust you place in us when you visit one of our websites or use one of our web services. We’ve built an enduring reputation for using technology and data to bring transparency, integrity and efficiency to everyone we serve. Part of our commitment to transparency and integrity is making sure you understand what data we collect, how we use it and how it may be shared.

This Kustmann Consult Privacy Policy (“Policy”) describes how we collect and use your personal information when you visit our websites, use our mobile and web applications, or call us on the phone. In this Policy, “we” and “our” references Kustmann Consult and “you” and “your” references any person who uses any of our websites, services and/or applications.

What is personal information?

By personal information, we mean information that can be used to identify, locate, or contact you, whether used alone or when combined with other identifying information. Personal information *does not include* information lawfully made available from government records or de-identified or aggregated consumer information.

This Kustmann Consult Privacy Policy includes service-specific charts listing the types of personal information Kustmann Consult collects as well as Kustmann Consult’s business purpose for the collection of the specified personal information.

Use of our Sites & Services

This website and all of the tools and services on our websites are owned and operated by Kustmann Consult OÜ (“Kustmann Consult”). By visiting www.kustmann.com and/or licensing and using our products and services including, but not limited to, Guess The Footballer®, Crypto Rates®, Football Teams Quiz®, Africa MoneyConvert® (collectively referenced as “Services”), you accept the practices described in the policy. This Policy applies to the use of any Kustmann Consult websites or services which either link directly to this Policy, display this Policy, or otherwise indicate that this Policy applies (collectively referenced as “Sites and Services”). "Preview," "Beta," "Promotional," or other similar types of non-standard or pre-release software, services, or websites may be governed by different or additional terms, such as a non-disclosure agreement or other terms. In some cases,

certain software, websites or services from companies other than Kustmann Consult will be governed by separate policies owned by those companies.

By accessing or using Kustmann Consult Sites and Services covered by this Policy, you agree to this Privacy Policy. If you do not agree to this Policy, do not access or use these Sites and Services. By continuing to use Kustmann Consult Sites and Services, you are authorizing your acceptance of the terms and conditions explained in this Policy.

Notice of Collection

We want you to know that we collect personal information actively and passively, and we sometimes obtain information from third-party sources. This means that when you use our Sites and Services, we sometimes require you to provide personally identifiable information when you want to take specific actions like registering for our services, placing a bid, uploading images, etc. In addition, when using our Sites and Services, our Sites and Services passively collect personally identifiable information as necessary to ensure the Sites and Services are operating effectively for our users. For example, this is a necessary step to ensure bids are transmitted accurately and that you have appropriate access to any Kustmann Consult service you license. Finally, we receive information lawfully made available from publicly available government records such as final bid submission information supplied to us by government agencies (third-party sources) and used by Kustmann Consult to incorporate into the Services. To learn how we obtain publicly available data and how we use it, [click here](#).

Collecting for Business Purpose

- We collect personal information and use it inside our Sites and Services. We may anonymize some of the data. For example, we receive certain standard information that your browser sends to every website you visit, such as your IP address, browser type and access times. This type of information is collected for purely internal purposes such as marketing analysis or demographic studies and is used solely to improve Kustmann Consult Sites and Services to better address our users' needs.
- We also collect personal information, aggregate it, anonymize it, and display it inside our Sites and Services. For Bidx.com® users, we collect the personal information you provide during account registration and make your contact information available for use by other users including agencies and subscribers within the specific Services you license. For non-Bidx.com users, we collect the personal information you provide during account registration and make your contact information available to all users and to all public agency users registered with our Services.
- We collect and package publicly available data that public agencies post to our bidding services and offer value-added services.

Collecting for Commercial Purpose

- We source publicly available information from government agencies for use inside our Services and for resale.
- We also package publicly available data that agencies post to our bidding services and sell to data resellers.
- If Kustmann Consult becomes aware of users scraping data from Bidx.com®, Bidexpress.com, or Kustmann Consultexpress.com, in violation of the Sites and Services Terms of Use, Kustmann Consult will exercise its right to enforce technical and/or legal remedies.

To submit a request to opt out of personal information being shared with third parties, click [Do Not Sell My Info](#).

Notice of Access and Sharing

Personal Information Required to Use Services

To register to use an Kustmann Consult Service, you will be required to share certain personal information. Your submission of personal information to register for an account and any submission of personal information to each Kustmann Consult Service under the licensing agreement or terms of use is required to fully use each service. Kustmann Consult prioritizes your safety and always designs its Sites and Services to keep your information secure and ensure that you control the access to and the sharing of your personal information to the extent possible.

User-Controlled Access to Personal Information and Data

Certain Kustmann Consult Sites and Services allow you to submit personal information and upload data where you control access to that information and data. For example, the Appia and Doc Express services as well as Kustmann Consult Hosting Services allow you to input and control access to your data. You also control the users you allow to access and control your data.

Kustmann Consult **will not** access this data unless you, the licensee, specifically direct us to do so. Kustmann Consult **will not** allow third party access to this data, unless Kustmann Consult needs to do so or is required to do so in order to (a) comply with the law when there is a clear, unambiguous legal duty to do so; (b) protect the property or rights of Kustmann Consult or our customers, including the enforcement of our agreements or policies governing your use of the services; or (c) act in a good faith belief that such access or disclosure is necessary to protect the personal safety of Kustmann Consult employees, customers or the public.

Kustmann Consult Access to Personal Information and Data

We may access or disclose your data in order to: (a) comply with the law when there is a clear, unambiguous legal duty to do so; (b) protect the property or rights of Kustmann

Consult or our customers, including the enforcement of our agreements or policies governing your use of the services; or (c) act in a good faith belief that such access or disclosure is necessary to protect the personal safety of Kustmann Consult employees, customers or the public. We may also disclose personal information as part of a corporate transaction such as a merger or sale of assets — but only if this information is required by a clear legal duty and to the barest extent permitted to preserve the scope of the confidentiality of that personal information.

What We Share with Third Parties

Kustmann Consult may share personal information collected with third parties.

Here's what we may share and why:

- In Kustmann Consult bidding Services, for example, your personal information is necessarily transmitted:
 - in cases of bid submission over the internet (you transmit your bid and identifying information to the agency to which you bid);
 - in cases of posting or responding to solicitations inside the Small Business Network (you submit business contact information that is viewable by others);
 - or when an agency develops a list of those who have downloaded plans from the Plan Room (the publishing agency will have access to your business contact information and may or may not publish that list themselves).
- Kustmann Consult issues its Digital IDs following the Baseline Requirements for the Issuance and Management of Publicly-Trusted Certificates. We are required to share your name in publicly available certificate lists if you apply for and receive a Digital ID to encrypt and securely sign bids and documents in our Services.
- If you use an Kustmann Consult mobile device application, information that you disclose voluntarily which identifies your mobile device will be collected, but will only be disclosed to those you have voluntarily provided that information.
- If you enter one of our websites or services through a third party, such as a social media platform or advertisement, Kustmann Consult does not have control over what data is collected by the third party. Users should be aware of how they enter Kustmann Consult's websites and services and if the owner of the access point is collecting or selling your information.

Kustmann Consult Bidding Services - Troubleshooting

- We may share personal information with the agency related to your bid submission prior to the letting end date.

- We may share personal information with the agency related to your bid submission after the letting end date and prior to bid opening.
- We may share personal information with the agency related to your bid submission after bid opening:
 - Kustmann Consult may share timestamps of bid packages submitted to the Service via phone, email, or electronic transmission for business purposes during troubleshooting or other such activities essential to the operation of the Kustmann Consult Services.
 - Kustmann Consult will summarize the support history (calls, email, chats), if any, of your bid submission and will provide it to agency at agency request.
- Additionally, sometimes certain personal information may be shared with those agencies via phone, email, or electronic transmission for business purposes during troubleshooting or other such activities essential to the operation of the Sites or Services.

Right to Know

You may request access to the specific pieces of personal information collected about you in the 12-month period ending on the date of your request. These disclosures include:

- The categories of personal information collected about you.
- The categories of sources from which personal information is collected.
- The business or commercial purposes for collecting or selling personal information.
- The categories of third parties with whom the business has shared the personal information.
- The categories of personal information sold and the categories of third parties to whom the personal information was sold.
- The categories of personal information disclosed for a business purpose.

Right to Request Deletion

You may request we delete your personal information. Upon verification of your request, we will delete personal information that is not lawfully made available from federal, state, or local government records and which is not maintained for a permitted purpose under The EU General Data Protection Regulation (GDPR) or similar law. Permitted purposes include:

- auditing the consumer or transaction interaction, including counting and verifying quality of ad impressions
- detecting or preventing security incidents or other illegal activity and prosecuting the responsible parties

- diagnosing problems with our services
- short-term, transient use that does not build a profile or otherwise alter an individual consumer's experience outside the current interaction
- performing services for a GDPR-covered business or its service provider, such as customer service, order fulfillment, payment processing, financing, advertising, marketing, or analytic services
- undertaking internal research for technological development and demonstration
- maintaining quality or safety or improving or upgrading a service or device owned, manufactured, or controlled by or for the business
- exercising or enforcing any other exceptions provided by the GDPR

Notice of Right to Opt Out

You may opt-out of the sale or disclosure of personal information that is not publicly-available information derived from a governmental entity and which is not maintained for a permitted purpose under the GDPR or similar law. Kustmann Consult provides several channels for users and their authorized agents to opt out, review and request changes to their communication preferences.

Here's how to opt out:

- Submit a form at kustmann.com
- Clicking unsubscribe or contacting us via the footer of a marketing email.

Note: If you have provided more than one email address to us, you may continue to be contacted unless you request to unsubscribe each email address you have provided.

Security

Our responsibility. Kustmann Consult is committed to protecting the security of your data. We follow the National Institute of Standards and Technology (NIST) and other national cybersecurity and privacy standards to develop and audit our security processes. We use a variety of security technologies and procedures to help protect your data from unauthorized use, access or disclosure. For example, we store the data we collect on computer systems with strict limited administrative and physical access and in controlled facilities. When we transmit certain sensitive data over the internet, we always protect it using encryption.

Your responsibility. If a username and/or password is used to help protect your accounts and data, it is your responsibility to keep your information confidential and your internet connection secure. Do not share this information with anyone. If you share a computer

with anyone, you should always log out before leaving an Kustmann Consult Site or Service to protect access to your data from subsequent users.

Cookies, Behavior Display Ads, Retargeting Ads

At Kustmann Consult, we believe in being transparent about how we collect information from individuals using our sites and services. Kustmann Consult may use cookies and similar technology to improve your experience on our sites. We use this information to customize our communications, analyze usage, measure success and promote trust to users. For example, these features make it possible for us to pre-populate your username for easier login, allow user-specific messaging or to permit advertising unique to your apparent interests. Our site may also use web beacons, which is a clear electronic image used to assist in delivering cookies on our sites and allows us to count users who have visited specific pages. We may include web beacons in promotional emails or our newsletters in order to determine if messages have been opened or clicked on.

By continuing to visit or use our sites or services, you agree to the use of cookies and similar technologies for these purposes.

Here's how cookies help us monitor site analytics:

Kustmann Consult utilizes a third-party website analytics service to monitor visitor trends on our website. The service, Google Analytics, sets a cookie - a small, unique text file - on your computer so we can monitor site traffic. Kustmann Consult uses the information gathered to make your browsing experience more enjoyable. The cookie is for tracking purposes only and is not used to gather or to distribute personally identifiable information. For more information on Google Analytics, visit <http://www.google.com/analytics/>.

Here's how behavior display ads, retargeting ads, and targeting cookies work on our social media:

Facebook Cookies: Kustmann Consult may use the pixel function of Facebook Custom Audiences to identify users who have landed on certain pages of Kustmann Consultinc.com for the purposes of targeted group-orientated remarketing and advertising. The Facebook pixel stores a cookie, which means that information about your visit to our site will be shared with Facebook. Also, as part of the advanced matching functionality undertaken by Facebook, other personal information (such as telephone number, email address, Facebook ID) may be shared with Facebook in a protected form. These cookies and the information collected are used to create target groups to help Facebook deliver advertising on our behalf to users who have previously visited our site when they are on Facebook or a digital platform powered by Facebook Advertising and to track advertising success. You can modify your Facebook Ad settings to restrict these advertisements. To adjust your

preferences, navigate to Settings/Adverts in your Facebook account. For more information on Facebook's cookie policy, visit <https://www.facebook.com/policies/cookies/>.

LinkedIn Targeting Cookies: We may use LinkedIn Insight Tags across our site to monitor traffic from the LinkedIn social media platform. The LinkedIn Insight Tag is lightweight JavaScript code that is added to our site to enable campaign reporting and provide us with insights about visitors to our site. For more information on LinkedIn's cookie policy, visit <https://www.linkedin.com/legal//cookie-table>

Here's how web beacons and cookies work with our third party vendors:

Third Party Vendors: Kustmann Consult may occasionally hire other companies or contractors to provide limited services on our behalf, such as the processing of mailings, technical or engineering support, site hosting, payment processing, or performing statistical analysis of our sites or services. Those service providers will be permitted to obtain only the information they need to deliver the agreed upon service. They are required by agreement to maintain the confidentiality of the information and are prohibited from using the information for any purpose other than delivering the service to Kustmann Consult in accordance with our policies. However, our vendors may use aggregate data for fraud detection to help improve their services.

Third Party Technologies: Third parties, such as ad servers, ad networks and data exchanges ("advertisers") may place or recognize a unique cookie on your computer or use other technologies in order to tailor advertisements to your apparent interests and deliver those advertisements to you while you are on our sites. In addition, advertisers may use technologies to collect information about your browsing behaviour on our sites which they may match with information they have previously collected. Kustmann Consult's Privacy Policy does not cover any use of information that advertisers may collect from you or that you choose to provide to them. For information about how to opt out of receiving certain behavioural advertisements, please visit our opt-out and cookie policies.

Social Media Widgets: Our site occasionally includes social media features, such as the Facebook Like button or Share button, and widgets, such as interactive mini-programs. These features may collect your IP address, which page(s) you are visiting on our website, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our website. Your interactions with these features are governed by the privacy statement of the company providing the features.

Your Cookie Choices

You can choose to opt-out of our use of cookies by setting your browser to not accept cookies. It's important to note that by manually opting out of the use of cookies, you may significantly decrease your overall experience with our Sites and Services and remove your ability to create a customized experience.

You may also choose to opt out of the collection and use of information for ad targeting through industry-standard websites such as <https://optout.aboutads.info/?c=2&lang=EN> or www.networkadvertising.org/choices.

Right to Non-Discrimination for Exercising Your Privacy Rights

Kustmann Consult will never discriminate against you for exercising any of your GDPR rights described in this Privacy Policy. Unless permitted by the GDPR, we will not:

- Deny you goods or services
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties
- Provide you a different level or quality of goods or services
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services

Changes to Our Privacy Policy

Kustmann Consult may need to change this Policy in order to comply with or adapt to legal, technical, or business developments. When these changes affect the way we collect and use your personal information, Kustmann Consult will provide you with an additional notice.

The date at which this Policy was last revised is always available at the beginning of the Policy.

Contact Us

For more information about this Privacy Policy, please see our [Contact Us](#) page or email kustmannconsult@gmail.com.