

Privacy Policy and User Information

This Privacy Policy explains how Iterra SIA processes personal data when you visit or use: (i) the website <https://www.custom-tools.online> ("Website"), (ii) our mobile or desktop applications ("App"), and (iii) other digital channels we control (together, the "Services"). It also describes your rights and how to exercise them under the EU General Data Protection Regulation (GDPR).

1. Data Controller

Iterra SIA (Reg. No. 40203668889; VAT: LV30ZZZ40203668889)

Registered address: Mezezera iela 2, 1B, LV-2107 Dzilnuciems, Latvia

Phone: +49 174 4890542

Email (general and privacy contact): support@iterra-sia.com

The Data Controller's representative can be contacted at the above details.

2. Data Protection Officer (DPO)

Iterra SIA has appointed a Data Protection Officer in accordance with Articles 37–39 GDPR. You can contact the DPO at the Data Controller's registered address and at support@iterra-sia.com.

3. Scope of this Policy

This Policy applies to the Services listed above. It does not apply to third-party websites, pages, platforms, or services that we do not control, even if linked from our Services.

4. Categories of Personal Data We Process

We collect and process the following categories of personal data, either provided by you directly or obtained automatically when you use the Services:

- Technical and usage data (Website/App): IP address, device identifiers, operating system and browser details, pages and content viewed (URI/URL), dates and times of access, request methods, response status codes, and similar telemetry necessary for the operation and security of the Services.
- Data you provide voluntarily: contact details (e.g., name, email, phone), account registration data (including password), company details for business customers (e.g., legal name, VAT number, registration number) and contact data of representatives/authorized users.
- Tracking technologies: cookies, tags, pixels (on the Website) and mobile identifiers (in the App). For details and consent management, see our Cookie Policy available via the Website/App.
- Location data (optional): approximate location based on IP address for content localization on the Website and, if enabled on your device, precise location in the App. You can disable location sharing in your device or App settings at any time.
- Social sharing plugins: if you interact with social media plugins/buttons, the relevant platform may receive data in accordance with its own privacy notice.

- Push notifications (App): if enabled in your device settings, we may send service-related push notifications. You can disable these at any time in your device/App settings.

5. Purposes, Legal Bases, and Retention

We process personal data only where a legal basis applies under Article 6 GDPR. Below we outline our purposes, legal bases, and typical retention periods.

A. Operation of the Website/App and provision of the Services

Legal basis: Performance of a contract or steps prior to entering into a contract (Art. 6(1)(b) GDPR), and our legitimate interests in operating secure Services (Art. 6(1)(f) GDPR).

Retention: For as long as necessary to provide the Services and ensure security; then deleted or anonymized.

B. Account registration and management (including business accounts)

Legal basis: Performance of a contract or steps prior to entering into a contract (Art. 6(1)(b) GDPR).

Retention: For the life of the account and for applicable limitation periods thereafter if required for compliance or defense of claims.

C. Order-document handling, user support, complaint management, and platform-related follow-up.

Legal basis: Performance of a contract (Art. 6(1)(b) GDPR).

Retention: For the period necessary to process requests and to comply with legal retention requirements (typically up to 10 years for records subject to statutory retention).

D. Compliance with legal obligations (e.g., tax, accounting, commercial and platform-compliance obligations).

Legal basis: Compliance with a legal obligation (Art. 6(1)(c) GDPR).

Retention: For periods required by applicable law (typically up to 10 years).

E. Provision of marketplace services and facilitation of interactions between Users, Buyers and Sellers through our Services.

Legal basis: Performance of a contract (Art. 6(1)(b) GDPR).

Retention: For the duration of the service and applicable limitation periods thereafter. For incomplete draft Requests or Orders, related data are retained for up to 8 days.

F. Analytics and performance statistics (non-essential cookies and similar technologies)

Legal basis: Your consent (Art. 6(1)(a) GDPR). See Cookie Policy for details.

Retention: As specified in the Cookie Policy.

G. Geolocation for features you enable in the App or Website

Legal basis: Your consent (Art. 6(1)(a) GDPR).

Retention: For the time strictly necessary to provide the requested feature.

H. Profiling and targeted advertising via cookies/mobile IDs (non- essential)

Legal basis: Your consent (Art. 6(1)(a) GDPR). See Cookie Policy for details and controls.

Retention: As specified in the Cookie Policy.

I. Direct marketing communications via email, SMS, in- App, push, instant messaging, telephone, postal mail, and on- site pop- ups—on our own behalf. We do not sell your personal data.

Legal basis: Your consent (Art. 6(1)(a) GDPR). You can withdraw consent at any time, including via unsubscribe links in emails or by adjusting your preferences in your account.

Retention: Contact details used for marketing are retained until consent is withdrawn or, where we apply internal hygiene rules, for no longer than 24 months since the last interaction.

J. ‘Soft opt- in’ emails about products/services similar to those you previously purchased or requested (where permitted by applicable law)

Legal basis: Our legitimate interests in promoting our products/services (Art. 6(1)(f) GDPR), subject to your right to opt out at any time.

Retention: Until you object or for an internal cap not exceeding 24 months since the last interaction.

K. Personalized offers based on your preferences, purchases, and behavior (profiling)

Legal basis: Your consent (Art. 6(1)(a) GDPR).

Retention: Purchase- related data used for profiling are retained for up to 24 months unless consent is withdrawn; other profile data are retained until consent is withdrawn.

L. Newsletters (if you register)

Legal basis: Your consent (Art. 6(1)(a) GDPR).

Retention: Up to 24 months since last interaction or until consent is withdrawn.

M. Publishing reviews/ratings/questions you choose to submit about Users, new features or marketplace transactions.

Legal basis: Our legitimate interests in improving services and providing user feedback (Art. 6(1)(f) GDPR).

Retention: Up to 24 months; you may post under a nickname and avoid uploading images if you do not wish this data to be visible to others.

N. User satisfaction surveys, market analysis, and business statistics (non- personal or limited- personal data).

Legal basis: Our legitimate interests in improving products and services (Art. 6(1)(f) GDPR).

Retention: Up to 24 months; you may object at any time.

O. Fraud prevention and abuse detection across our channels

Legal basis: Our legitimate interests in safeguarding our Services and users (Art. 6(1)(f) GDPR).

Retention: Up to 180 days for digital events and up to 5 years for traditional channels, then deletion or anonymization.

P. Establishment, exercise, or defense of legal claims

Legal basis: Our legitimate interests (Art. 6(1)(f) GDPR).

Retention: For the duration of proceedings and applicable limitation periods.

Q. Aggregate analytics and modeling after pseudonymization (no individualized effects)

Legal basis: Our legitimate interests (Art. 6(1)(f) GDPR).

Retention: Up to 36 months after pseudonymization.

6. Provision of Personal Data

Providing data for purposes A–E and D is necessary to use core aspects of the Services or to comply with law. Providing data for consent-based purposes (e.g., F, G, H, I, K, L) is optional; if you do not consent, corresponding features will not be available but core Services will remain unaffected. For legitimate-interest processing (e.g., M–Q), you may object at any time—unless we demonstrate compelling legitimate grounds or the processing is needed for legal claims.

7. Recipients and Processors

Personal data is processed by authorized personnel of Iterra SIA and by vetted service providers acting as data processors under Article 28 GDPR (e.g., hosting, maintenance, analytics, communication tools, customer support). The up-to-date list of processors is available on request at support@iterra-sia.com.

Where necessary, we may disclose data to independent controllers (e.g., payment providers you select, professional advisers, competent authorities) as required by law or to provide the Services you request.

8. International Data Transfers

If we transfer personal data outside the European Economic Area, we do so pursuant to Chapter V GDPR, using appropriate safeguards such as adequacy decisions under Article 45 GDPR or Standard Contractual Clauses under Article 46 GDPR, supplemented by transfer impact assessments and additional safeguards where appropriate.

9. Your Rights

You have the rights of access, rectification, erasure, restriction, objection, and data portability, as set out in Articles 15–22 GDPR. Where processing is based on consent, you may withdraw it at any time without affecting the lawfulness of processing before withdrawal.

To exercise your rights, contact us at support@iterra-sia.com. You also have the right to lodge a complaint with your local supervisory authority. In Latvia, this is the Data State Inspectorate (Datu valsts inspekcija).

10. Security

We implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk, including measures to protect against unauthorized access, alteration, disclosure, or destruction of personal data.

11. Changes to this Policy

We may update this Policy from time to time. We will post the latest version on the Website/App and indicate the effective date below.

12. Contact

If you have questions about this Policy or our data practices, please contact support@iterra-sia.com.

Effective date: February 16, 2026