

Privacy Policy

Introduction

Welcome to **Newtone Gas Springs**® **Avie Foreign Trade And Industry, LLC** . We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us at info@newtonegs.com

When you visit our website, <https://newtonegs.com/en/home-2-english/> and use our services, you trust us with your personal information. We take your privacy very seriously. In this privacy notice, we describe our privacy policy. We seek to explain to you in the clearest way possible what information we collect, how we use it, and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy policy that you do not agree with, please discontinue use of our Sites and our services.

This privacy policy applies to all information collected through our website <https://newtonegs.com/en/home-2-english/>, and/or any related services, sales, marketing, or events (we refer to them collectively in this privacy policy as the "Sites").

Information We Collect

We collect personal information that you voluntarily provide to us when expressing an interest in obtaining information about us or our products and services, when participating in activities on the Sites (such as posting messages in our online forums or entering competitions, contests, or giveaways) or otherwise contacting us.

The personal information that we collect depends on the context of your interactions with us and the Sites, the choices you make, and the products and features you use. The personal information we collect can include the following:

- **Name and Contact Data:** We collect your first and last name, email address, postal address, phone number, and other similar contact data.
- **Credentials:** We collect passwords, password hints, and similar security information used for authentication and account access.

How We Use Your Information

We use personal information collected via our Sites for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below:

- **To Facilitate Account Creation and Logon Process:** If you choose to link your account with us to a third-party account (such as your Google or Facebook account), we use the information

you allowed us to collect from those third parties to facilitate account creation and logon process for the performance of the contract.

- **To Send Administrative Information to You:** We may use your personal information to send you product, service, and new feature information and/or information about changes to our terms, conditions, and policies.
- **To Protect Our Services:** We may use your information as part of our efforts to keep our Sites safe and secure (for example, for fraud monitoring and prevention).
- **To Enforce Our Terms, Conditions, and Policies for Business Purposes, to Comply with Legal and Regulatory Requirements or in Connection with Our Contract.**
- **To Respond to Legal Requests and Prevent Harm:** If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- **To Manage User Accounts:** We may use your information for the purposes of managing our account and keeping it in working order.
- **To Deliver Services to the User:** We may use your information to provide you with the requested service.
- **To Respond to User Inquiries/Offer Support to Users:** We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Services.
- **To Send You Marketing and Promotional Communications:** We and/or our third-party marketing partners may use the personal information you send to us for our marketing purposes if this is in accordance with your marketing preferences. For example, when expressing an interest in obtaining information about us or our Sites, subscribing to marketing, or otherwise contacting us, we will collect personal information from you. You can opt-out of our marketing emails at any time (see the "Your Privacy Rights" below).

Sharing Your Information

We only share and disclose your information in the following situations:

- **Compliance with Laws:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests and Legal Rights:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.
- **Vendors, Consultants, and Other Third-Party Service Providers:** We may share your data with third-party vendors, service providers, contractors, or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include:

payment processing, data analysis, email delivery, hosting services, customer service, and marketing efforts. We may allow selected third parties to use tracking technology on the Sites, which will enable them to collect data about how you interact with the Sites over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content, pages, or features, and better understand online activity. Unless described in this Policy, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.

- **Business Transfers:** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **With Your Consent:** We may disclose your personal information for any other purpose with your consent.

Your Privacy Rights

In some regions (like the European Economic Area), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please use the contact details provided below. We will consider and act upon any request in accordance with applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

Data Retention

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this policy will require us keeping your personal information for longer than the period of time in which users have an account with us.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Updates to This Policy

We may update this privacy policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal, or regulatory reasons.

Contact Us

If you have questions or comments about this policy, you may email us at info@newtonegs.com or by post to:

Newton Gas Springs®

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