

# Privacy Policy

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IRefer Inc. (d/b/a “SuperVisas”) takes your privacy seriously and is sensitive to potential concerns about how we use the personal information we collect from and about you. This Privacy Policy describes how we collect, use, store, process, and disclose personal information of individuals. This Privacy Policy applies to iRefer Inc. as well as our subsidiaries and any affiliates, including iRefer USA Inc. In this Privacy Policy, personal information (“Personal Information”) refers to any data that on its own, or in combination with other available information, can identify an individual.

We follow the obligations under the following regulations:

- Canada's Personal Information Protection and Electronic Documents Act (PIPEDA) and the applicable provincial legislations
- the EU's General Data Protection Regulation (GDPR)
- California's Consumer Privacy Act (CCPA) / California Privacy Rights Act (CPRA) and California Online Privacy Protection Act (CalOPPA)
- Colorado Privacy Act (CPA)
- Utah Consumer Privacy Act (UCPA)
- Connecticut Data Privacy Act (CTDPA)
- Virginia Consumer Data Protection Act (VCDPA)

The scope of this Privacy Policy covers both your use of the SuperVisas website, applications, products, services and any other ways in which you may interact with SuperVisas, such as when you speak to us on the phone. It also describes the choices available to you regarding our use of your personal information.

By using the website located at [www.supervisas.com](http://www.supervisas.com) (including all subdomains) (the “Site”) or the services provided by SuperVisas (the “Services”), you agree to the information practices described in this Privacy Policy. If you do not agree to the terms of this Privacy Policy, you may not access or use the Site or Services. This Privacy Policy is incorporated into and subject to the SuperVisas Terms of Use ([www.supervisas.com/terms-of-use.pdf](http://www.supervisas.com/terms-of-use.pdf)).

# 1 Information We Collect

In this section, we explain what types of Personal Information we may collect about individuals. The Personal Information collected depends on the type of interaction we have with an individual (such as calling or visiting our website), the types of products an individual considers or purchases, and what information customers choose to share with us. It also includes the information that we may collect about people in connection with our employment recruiting activities.

## Personal Information

When you use the Site or Services, we collect certain information from you which can be used to contact or identify you, including, but not limited to, your name, gender, date of birth, telephone number, postal address, and email address (“Identity Information”). If you place an order for Services and/or pay a fee, we will collect additional payment and billing information from you, including, but not limited to, your credit/debit card information or bank account information (“Billing Information”). You may also be required to provide information or documents necessary for the preparation or filing of forms or applications to be submitted to government agencies, including educational history, family history, employment details, travel information, government identifiers (driver’s license, passport numbers) and if you file an application, we may receive from the government a unique receipt number assigned to your application (“Application Information”). Application Information may also include content you create through our products or services. Together, your Identity Information, Billing Information, Application Information are referred to as Personal Information.

## Internet Information

Examples of the type of internet or other electronic network activity information that we may collect includes browsing history, search history, IP address, time zone, browser type, referring website URLs, log files information about the device the individual is using to access our website or applications, and information regarding an individual’s interaction with our websites, applications, or advertisements. We may also collect information from visitors to our website such as browser settings, operating systems, referring/exit pages, and clickstream data. When we send you an email, SuperVisas may also collect information, including about how you interact with that email.

## Third Parties

We may receive Personal Data about you from various third parties, including device and usage data from third parties, including analytics providers such as Google; account information from social media platforms, email providers, when you give us permission to access your data on such third-party services or networks; organizations (such as law enforcement agencies), associations and groups, who share data for the purposes of fraud prevention and detection and credit risk reduction.

## Employment related information

When a candidate applies for an open position with SuperVisas we may collect information

about professional status and affiliations, employment history, salary expectations, and employment status.

We do not collect biometric or education information that is maintained by an educational institution or party acting on an educational institution's behalf. We also do not collect inferences about individuals, although we may internally create inferences based on the information that we do collect.

## 2 Policy Regarding Children

Our Site and Services are not intended for persons under 18 years of age, and we do not knowingly collect Personal Information from persons under 18 years of age, unless the information is part of Application Information provided by a representative, parent or guardian. If you are a parent or guardian and believe that your child has provided us with Personal Information without your consent, please contact us using the information found at the bottom of this Privacy Policy. If we become aware that a person under 18 years of age has provided us with Personal Information, we will delete such information from our files.

## 3 Cookies and Similar Technologies

### Cookies

Like many websites, we utilize devices to recognize you when you visit the Site, track your interactions with the Site, and personalize your experience. These include devices such as cookies, web beacons, pixels, and similar means. Cookies are small data files we transfer to your computer's hard drive. We utilize some cookies that remain on your computer after you leave the Site so that we can recognize you when you return and provide a more personalized and helpful experience. We also utilize session cookies to enable certain features of the Site, to better understand how you interact with the Site, to monitor the use of the Site and web traffic routing on the Site. Session cookies are deleted from your computer when you log off from the Site and close your browser. You maintain control over some of the information we collect through the use of cookies, and you can set your preferences regarding the use of cookies through your browser settings. If you choose not to accept cookies, you may not be able to access portions of the Site or all functionality of the Services.

### Google Analytics

We use Google Analytics to collect information about the use of the Site. Google Analytics collects information such as how often users visit the Site, what pages they visit when they do so, and what other websites they used before coming to the Site. We use the information we get from Google Analytics to improve the Site and Services. Google Analytics collects only the IP address assigned to you on the date you visit this site, rather than your name or other Personal Information. You can read more about how Google uses your Personal Information [here](#). You can also opt out of Google Analytics [here](#). You can prevent Google Analytics from recognizing you on return visits to this site by disabling cookies on your browser.

## 4 How We Use the Information We Collect

We collect and use Personal Information with consent to provide, maintain, and develop our products and services and understand how to improve them.

When we process your Personal Data to provide a product or service, we do so because it is necessary to perform contractual obligations. The processing is necessary in our legitimate interests to provide products and services and to maintain our relationship with you and to protect our business, for example against fraud. Consent will be required to initiate services with you. New consent will be required if any changes are made to the type of data collected. Within our contract, if you fail to provide consent, some services may not be available to you.

### Account Creation

We use information you submit to us at the time of account registration, such as your name and email address, and any updated information you subsequently submit, such as a new email address, to create and maintain your account.

### Operation and Improvement of Our Business

We use your information, including Personal Information, primarily to operate our business and provide Services to you, including the completion of immigration forms. We use such information to personalize the Services we provide to you. We may use your information to verify your identity, for fraud prevention, to enforce the Terms of Service, and to protect the integrity of the Site. We may also use your information to develop new features or Services and to improve the quality of our Services.

### Customer Service and Technical Support

We may use your information, including Personal Information, to respond to questions you have regarding the use of our Services or to provide technical assistance.

### Communications with You

We may contact you using the contact information you provide to respond to inquiries you send to us, to communicate with you regarding our Services and the services of our partners, and to market our Services, or those of our partners, to you. We will only use your contact information to communicate with you regarding our partners' services with your prior consent. We may send you emails advertising or promoting our Services or those of our partners. If you do not wish to receive such emails, you can choose to opt out.

### Internal Research

We may use information about you and other users, in aggregate form or anonymized form, for our internal research and analytical purposes. For example, we may use certain types of your information to understand which features of our Services are being used most frequently.

## Product Development and Services

SuperVisas may collect information for improving our existing products and developing new products and improving services provided to our clients.

## Application Status

We may use your government identifiers from time to time to check your application status, so that we may provide you with pertinent general information about the steps in the application process. If, at any time, you do not want SuperVisas to check your application status you can opt out or withdraw your consent.

# 5 Information Sharing and Disclosure

In this section of the Privacy Policy, we explain who we share information with and under which circumstances we may do so.

## Your Privacy Rights & Consent

SuperVisas does not share your Personal Information with third parties for their marketing purposes without your consent. We may share your information, including Personal Information, with third parties if you provide us with authorization to do so.

## International Data Transfer and Storage

We store and process Personal Information on servers in the USA, which may not be within the country, state or province in which you reside and where the data laws may differ from those in your jurisdiction. We will take appropriate steps to ensure that your Personal Data is treated securely and in accordance with this Privacy Policy as well as applicable data protection law. In regions that are not considered adequate, we will enter into contracts with EU Standard Contractual Clauses (or equivalent measures) with parties outside the EEA and ensure adequate controls are in place for the security of your data.

## Service Providers

We may share your Personal Information with third-party service providers, but only to the extent necessary for them to assist us in providing our Services. For example, we store your data for marketing purposes in HubSpot. Also, if you purchase Services, we will share your Billing Information with third-party payment processors, such as Stripe, to the extent necessary to process your payment. We require all third-party service providers to protect the security of your Personal Information, to keep your Personal Information confidential, and to use such information for no other purposes.

## Legal Requirement

We will not voluntarily disclose your Personal Information. However, we may disclose your Personal Information as required by law, such as in response to a court order, subpoena, or

similar legal process legally requiring us to produce the information. If legally permitted and feasible, we will give you notice of our receipt of a demand for your Personal Information and provide you a reasonable time in which to seek to quash such demand in court, or otherwise obtain a withdrawal or modification of the demand, before complying with the demand.

#### Business Transfers

Your Personal Information may be included if some or all of our assets are sold, assigned, or transferred in connection with a merger, acquisition, reorganization or sale of assets, or in the event of bankruptcy. As a general matter, however, an acquiring party cannot retroactively change the Privacy Policy that was in place when SuperVisas collected your Personal Information.

#### Selling of Personal Information

SuperVisas does not sell Personal Information to third parties and will not sell your Personal Information. If, in the future, SuperVisas does decide to sell Personal Information, any Personal Information collected prior to updating this Privacy Policy will be treated as if a valid request to opt-out from third party sales had been submitted by the individual that the information relates to.

## 6 Retention of Personal Information

At a minimum, we will retain your Personal Information for as long as it may be needed to provide you Service and as needed to comply with our legal obligations. When we no longer need your information, we may remove it or take steps to anonymize it. Unless you request deletion of your Personal Information sooner, we may hold your Personal Information which may be used to provide future Services for up to ten years. Upon request, SuperVisas will inform you whether we hold any of your Personal Information. You may terminate your account and request the deletion of your Personal Information by contacting us. In some situations, we may be legally required to retain your Personal Information or for other reasons will not be able to comply with a request to delete data.

## 7 Third Party Links

#### Third-Party Websites.

SuperVisas may maintain links to other websites and other websites may maintain links to SuperVisas' websites. This Privacy Policy applies only to SuperVisas and not to other websites accessible from SuperVisas or that you use to access SuperVisas, each of which may have privacy policies materially different from this Privacy Policy. If you visit other websites, SuperVisas is not responsible for the privacy practices or content of those sites. It is your responsibility to review the privacy policies of non-SuperVisas websites to confirm that you understand and agree with them.

## Social Media Widgets.

Our website includes social media features, such as the Facebook “like” button and widgets, such as the “Share this” button or interactive mini-programs that run on our site. These features may collect your IP address, which page you are visiting on our site, 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 policy of the company providing them.

## 8 Security

SuperVisas is committed to Data Security. We strive to make certain that our servers and connections incorporate the latest encryption and security devices. We have put in place organizational safeguards and security measures to protect the information we collect, both during transmission and once received. This includes, but is not limited to, encryption, access control and audit logging. However, no method of transmission over the internet or method of storage is 100% secure. We cannot guarantee that our security measures will prevent our computer systems from being accessed illegally, nor can we guarantee that the information on our computer systems will not be viewed or stolen. ACCORDINGLY, SUPERVISAS.COM DISCLAIMS ALL LIABILITY FOR THE THEFT, INTERCEPTION, LOSS, OR UNAUTHORIZED ACCESS TO DAMAGE TO YOUR INFORMATION. YOU ACKNOWLEDGE THAT USE OF THE SITE AND SERVICES IS AT YOUR OWN RISK.

In the unfortunate event of a Personal Information breach, we will notify you and any applicable regulator when we are legally required to do so. If you believe your privacy has been breached please contact us immediately or contact your case manager directly.

## 9 Your Rights for Your Personal Information

Depending on your geographical location and citizenship, your rights are subject to local data privacy regulations. These rights may include:

- Right to Access (PIPEDA, GDPR Article 15, CCPA/CPRA, CPA, VCDPA, CTDPA, UCPA)
  - You have the right to learn whether we are processing your Personal Data and to request a copy of the Personal Data we are processing about you.
- Right to Rectification (PIPEDA, GDPR Article 16, CPRA, CPA, VCDPA, CTDPA)
  - You have the right to have incomplete or inaccurate Personal Data that we process about you rectified.
- Right to be Forgotten (right to erasure) (GDPR Article 17, CCPA/CPRA, CPA, VCDPA, CTDPA, UCPA)
  - You have the right to request that we delete Personal Data that we process about you, unless we need to retain such data in order to comply with a legal obligation or to establish, exercise or defend legal claims.
- Right to Restriction of Processing (GDPR Article 18).

- You have the right to restrict our processing of your Personal Data under certain circumstances. In this case, we will not process your Data for any purpose other than storing it.
- Right to Portability (PIPEDA, GDPR Article 20)
  - You have the right to obtain Personal Data we hold about you, in a structured, electronic format, and to transmit such Personal Data to another data controller, where this is (a) Personal Data which you have provided to us, and (b) if we are processing that data on the basis of your consent or to perform a contract with you or the third party that subscribes to services.
- Right to Opt Out (CPRA, CPA, VCDPA, CTDPA, UCPA)
  - You have the right to opt out of the processing of your Personal Data for purposes of: (1) Targeted advertising; (2) The sale of Personal Data; and/or (3) Profiling in furtherance of decisions that produce legal or similarly significant effects concerning you. Under CPRA, you have the right to opt out of the sharing of your Personal Data with third parties and our use and disclosure of your Sensitive Personal Data to uses necessary to provide the products and services reasonably expected by you.
- Right to Objection (GDPR Article 21)
  - Where the legal justification for our processing of your Personal Data is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless we have compelling legitimate grounds for processing which override your interests and rights, or if we need to continue to process the Personal Data for the establishment, exercise or defense of a legal claim.
- Non-discrimination and non-retaliation (CCPA/CPRA, CPA, VCDPA, CTDPA, UCPA)
  - You have the right not to be denied service or have an altered experience for exercising your rights.
- File an Appeal (CPA, VCDPA, CTDPA)
  - You have the right to file an appeal based on our response to you exercising any of these rights. In the event you disagree with how we resolved the appeal, you have the right to contact the attorney general for the state.
- File a Complaint (GDPR Article 77)
  - You have the right to bring a claim before their competent data protection [authority](#).

## Withdrawing Consent

If you have consented to our processing of your Personal Information, you have the right to exercise your rights at any time, free of charge, such as where you wish to opt out from marketing messages that you receive from us. If you wish to withdraw your consent, please contact us using the information found at the bottom of the Privacy Policy. For your own privacy and security, at our discretion, we may require you to prove your identity before providing the requested information.

## 10 Changes to our Privacy Policy

SuperVisas may make changes to this Privacy Policy at any time. If we make any material changes, as determined in our sole discretion, we will notify you via email to the e-mail address specified in your registered account, or by posting the revised Privacy Policy on the Site before any changes become effective. The date the Privacy Policy was last revised is identified at the top of the page. You should review our Privacy Policy each time you access the Site or use the Services. Your continued use of the Site or Services following the posting of any changes or notice to you of the changes constitutes your agreement to such changes.

## 11 Contact Us

To exercise any of your rights, request a copy of your information, unsubscribe from our email list, request for your data to be deleted, or ask a question about your data privacy, please contact us by email [support@supervisas.com](mailto:support@supervisas.com)