

April 28, 2025

Lucky Penny Software Privacy Notice

At Lucky Penny Software, LLC (“**Lucky Penny**”, “**Company**”, “**we**”, “**our**” or “**us**”), we value your trust. We are committed to acting responsibly when we collect, use and protect your non-personal and personal information.

We believe in being clear and transparent about how we collect, use, and share your information. This Privacy Notice describes how we collect Personal Information and other data when you interact with us through any of the following:

- Visiting our website at luckypennysoftware.com (“Website” or “Site”);
- Interacting with us through customer service communications;
- Opting in to receive text messages or SMS mobile messages from us;
- Responding to or interacting with marketing emails or other digital communications;

(collectively, the “**Services**”).

This Privacy Notice applies to all individuals who access or use the Services and explains what information we collect, how we use it, the choices available to you, and how we protect your information.

No matter how Lucky Penny comes to have your information, we want you to know that we respect the privacy of your information and that you should be aware of how we manage it. This Privacy Notice is designed to help you understand how we collect, use, share and safeguard the information you provide to us and to assist you in making informed decisions when using our Services.

By accessing or using the Services, you acknowledge that you have read and understood this Privacy Notice, and you consent to our collection, use, storage, and disclosure of your Personal Information as described below

The Services are intended for individuals located in the United States, the United Kingdom, and the European Union. If you reside outside of these regions, please note that the Services may be subject to different laws and regulations in your country. By using the Services, you acknowledge and accept these conditions, and we thank you for your interest.

1. Types of Data We Collect

We collect “**Personal Information,**” **our Services**—specifically, your name, email address, payment information, billing address, and cell which is limited to the information necessary to provide phone number. You do not need to provide Personal Information to browse the public pages of the Site. However, to access certain products or services offered through the Site or elsewhere, you may be required to register and provide this limited set of Personal Information. We may also collect “Non-Personal Information” include information that cannot be used to personally identify you, such as anonymous usage data, general demographic information we may collect, referring/exit pages and URLs, platform types, preferences you submit and preferences generated based on the data you submit and number of clicks.

2. Children's Online Privacy Protection Act ("COPPA")

Our Services are not directed to children under the age of 13, and we do not knowingly collect, use, or disclose Personal Information from children under 13. If we become aware that we have collected Personal Information from a child under 13 without verified parental consent, we will promptly delete that information in accordance with applicable law.

If you believe we may have collected information from a child under 13, please contact us at support@luckypennysoftware.com so that we can take appropriate action.

3. Information You Provide to Us

We collect Personal Information that you voluntarily provide when you set up an account through the Services. This may include your first and last name, email address, mailing address, and mobile phone number.

We may use your mobile phone number to send you SMS text messages related to your account, transactions, updates, or customer service. By providing your mobile number, you consent to receive such messages. Message and data rates may apply. You can opt out of receiving marketing-related text messages at any time by following the instructions provided in the message or contacting us directly. Opting out of marketing texts will not affect your receipt of important service-related messages.

When you engage us to provide Services, our third-party payment processor, Paddle will collect the information necessary to process your payment, including your name, credit card details, and billing information. We do not store or have access to your full credit card information. Please review Paddle's Privacy Policy <https://www.paddle.com/legal/privacy> for more information on their data practices.

If you provide feedback or contact us via email, we may collect your name, email address, and any additional information you include in your message in order to respond to your inquiry. We will retain this information in accordance with applicable federal and state laws.

In compliance with the CAN-SPAM Act, any marketing emails from us will clearly identify the sender and include a physical address and an option to opt out of future communications. If you no longer wish to receive emails from us, you may unsubscribe at any time using the instructions included in our emails.

4. Collected via Technology

In an effort to improve the quality of the Services, we reserve the right to track certain information automatically collected from your device when you use the Services. This may include information such as the referring URL (the website you came from), type of browser and operating system you use, your IP address, device identifiers, the date and time of your access, and other usage data that may be associated with you or your device but does not directly identify you.

We use this information through the deployment of "Cookies" and similar tracking technologies. Cookies are small text files that are stored on your browser or device by a website. They are widely used to make websites work, improve efficiency, and provide information to the owners of the site.

We use session Cookies, which expire when you close your browser. You may delete or disable these Cookies through your browser settings, although doing so may limit your use of certain features on our Services.

You can learn more about how to manage Cookies using your browser settings or visit www.allaboutcookies.org.

We may also use third-party analytics tools, such as **Google Analytics** to collect data on your interactions with the Services. These tools may use Cookies and similar technologies to track details such as which pages you visit, your IP address, and how long you stay on our Site. For more information on how Google collects and uses data, see:

- <https://policies.google.com/technologies/partner-sites>

You may opt out of Google Analytics by visiting:

- <https://tools.google.com/dlpage/gaoptout>

5. How we Use Your Personal Information

In general, Personal Information you submit to us is used either to respond to requests that you make, or to aid us in serving you better. We use your Personal Information in the following ways:

- to facilitate the creation of and secure your account;
- to provide Services as you requested;
- to identify you as a user in our system;
- to provide improved administration of the Services;
- to send you administrative email notifications, such as security or support and maintenance advisories;
- to comply with legal obligations, as part of our general business operations, and for other business administration purposes; and
- in very limited circumstances where we believe necessary to investigate, prevent or act regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person or violations of this Privacy Notice.

6. Use of Non-Personal Information

In general, we may use Non-Personal Information to help us improve the Services and customize the user experience. We also aggregate Non-Personal Information in order to track trends and analyze use patterns of the Services. This Privacy Notice does not limit in any way our use or disclosure of Non-Personal Information and we reserve the right to use and disclose such Non-Personal Information to our partners, advertisers and other third parties at our discretion.

7. How We Share Your Personal Information

We do not sell, rent, lease or otherwise transfer any information collected either automatically or through your voluntary action. We may disclose your Personal Information as described below and as described elsewhere in this Privacy Notice.

8. Third Party Service Providers.

We may share your Personal Information with third-party service providers as necessary to provide the Services. This includes, but is not limited to:

- Hosting and maintaining our Website and App,
- Conducting quality assurance and performance testing,
- Analyzing data to improve our Services,
- Facilitating account creation and management,
- Providing technical and customer support, and
- Delivering new features or updates in the future.

These service providers are authorized to use your Personal Information only as necessary to provide these services to us and are bound by contractual obligations to keep your information confidential and secure in accordance with applicable privacy laws.

We may also integrate third-party products and application programming interfaces (“APIs”) to enable or enhance certain features of the Services. Any data collected by such third-party APIs is governed by the privacy policies of the respective third parties, and we encourage you to review their privacy practices before engaging with those services. Base does not control how third-party providers process your Personal Information.

We do not sell or share your Personal Information with third parties for cross-context behavioral advertising without your explicit consent, in accordance with applicable state privacy laws.

9. Process Payments.

We transmit your Personal Information via an encrypted connection to our payment processor, Paddle. To learn more about this payment processor, and their policies related to privacy, go to <https://www.paddle.com/legal/privacy>.

10. Business Transfers.

If (i) Lucky Penny is acquired by, merges with, or receives investment from another company or (ii) if any of Lucky Penny’s assets are or may be transferred to another company, whether as part of a bankruptcy or insolvency proceeding or otherwise, we may transfer the information we have collected from you to the other company. As part of the business transfer process, we may share certain of your Personal Information with lenders, auditors, attorneys and consultants.

11. Other Disclosures.

Regardless of any choices you make regarding your Personal Information (as described below), we may disclose Personal Information if it believes in good faith that such disclosure is necessary (a) in connection with any legal investigation; (b) to comply with relevant laws or to respond to subpoenas or warrants served on us; (c) to protect or defend our rights or property, or the rights or property of users of the Services; (d) to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person and/or (e) to investigate or assist in preventing any violation or potential violation of the law, this Privacy Notice, or any agreements you may have with us, as applicable.

12. Links to Third Party Websites and Third-Party Providers

As part of the Services, we may provide links to or compatibility with other websites or applications; however, we are not responsible for the privacy practices employed by those websites or the information or content they contain nor are we liable for third party products, services, acts and/or omissions. This Privacy Notice applies solely to information collected by us in relation to the Services and your use of the Services. Therefore, this Privacy Notice does not apply to your use of a third-party website accessed by selecting a link on our Website, App or via the Services. To the extent that you access or use the Services through or on another website or application, then the privacy policy of that other website or application will apply to such access and/or use. We encourage our users to read the privacy statements of other websites before proceeding to use them.

13. Your Rights Regarding the Use of Your Personal Information

We may send you periodic promotional emails about our products, services, or upcoming events. You have the right at any time to opt out of receiving such marketing communications.

If you no longer wish to receive promotional emails, you can:

- Click the **“unsubscribe”** link located at the bottom of each promotional email, or
- Adjust your preferences in the **“Notifications”** or **“Communication Preferences”** section of your Account, if applicable.

Please note: Even if you opt out of promotional communications, we may still send you non-promotional, administrative messages about your account or the Services, such as transaction confirmations, legal notices (e.g., changes to our Privacy Notice), or service-related updates.

We process unsubscribe and opt-out requests as quickly as possible. However, please allow up to 10 business days for changes to take full effect in our systems.

14. Security of Your Personal Information and Personal Data

We implement security measures designed to protect your information from unauthorized access, alteration, disclosure and/or destruction. Because the internet is not a completely secure environment, we cannot warrant the security of any information a user transmits to us or guarantee that information on the Services may not be accessed, disclosed, altered, and/or destroyed by breach of any of our physical, technical and/or managerial safeguards. Any account you have on our Website and/or App is protected by your account password and we urge you to take steps to keep your Personal Information safe by not disclosing your password and by logging out of your account after each use. We further protect your information from potential security breaches by implementing certain technological security measures; however, these measures do not guarantee that your information will not be accessed, disclosed, altered or destroyed by breach of such firewalls and secure server software. While we use reasonable efforts to protect your Personal Information, we cannot guarantee the Services are absolutely secure.

15. How We Retain Your Personal Information

We retain your Personal Information only for as long as reasonably necessary to fulfill the purposes for which we collected it, including to comply with legal, regulatory, tax, accounting, or reporting requirements, to resolve disputes, and to enforce our agreements.

The specific retention period for any given type of data depends on several factors, including:

- The nature, scope, and sensitivity of the Personal Information;
- The potential risk of harm from unauthorized use or disclosure;
- The purposes for which we process the data and whether those purposes can be achieved through other means;
- Applicable legal or regulatory requirements, including retention obligations imposed by federal and state laws; and
- Contractual obligations or operational requirements.

In some cases, we may anonymize or de-identify your Personal Information (so that it can no longer be associated with you or used to identify you) for research, analytics, or statistical purposes, in which case we may retain and use this information indefinitely without further notice to you, in compliance with applicable law.

We may also retain certain Personal Information for a commercially reasonable time for purposes including but not limited to:

- Backups and disaster recovery;
- Archiving;
- Security and fraud prevention;
- Legal or compliance obligations;
- Exercising or defending legal claims.

In limited circumstances, if you choose not to provide requested information, we may be unable to provide certain Services or functionality.

You may request additional details regarding our specific retention periods for different categories of Personal Information by contacting us at the address provided below in this Privacy Notice.

Please also note that in the normal course of providing our Services, we may collect, maintain, and use aggregated, anonymized, or de-identified information, which is not considered Personal Information under applicable privacy laws. We may retain and use this type of data indefinitely, consistent with our legitimate business interests.

We will retain your Personal Information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. The precise periods for which we keep your Personal Information vary depending on the nature of the information and why we need it. To determine the appropriate retention period for Personal Information, we consider the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorized use and/or disclosure of your Personal Information, the purposes for which we process your Personal Information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymize your Personal Information (so that it can no longer be associated with a user) for research or statistical purposes in which case we may use this information indefinitely without further notice. We may retain information (including without limitation your personally identifiable information) for a commercially reasonable time for backup, archival, audit purposes, and/or to comply with legal obligations, resolve disputes and enforce agreements. In some cases, if you choose not to provide us with requested information,

you may not be able to use the Services. You can request further details of retention periods for different aspects of your Personal Information by contacting us.

Please note that in the course of providing the Services, we collect and maintain aggregated, anonymized, or de-personalized information which we may retain indefinitely.

16. Accessibility

If you are visually impaired, you may access this Privacy Notice through your browser's audio reader.

17. Changes to This Privacy Notice

We reserve the right to by placing a prominent notice on the Website and App. Significant changes will go into effect thirty (30) days following such notification. Non-material changes or clarifications will take effect immediately. You should periodically check the Website and App and this Privacy Notice for updates.

18. Other Jurisdictions

At this time, our business does not meet the applicability thresholds under U.S. state consumer privacy laws, including those in California, Virginia, Colorado, Connecticut, Utah, and Vermont. Accordingly, the rights and obligations under those state laws do not apply to our data processing activities. However, if you are located in the European Economic Area (EEA) or the United Kingdom (UK), the processing of your personal information is subject to the General Data Protection Regulation (EU GDPR) or the UK General Data Protection Regulation (UK GDPR).

Legal Basis for Processing

Under the GDPR, we process your personal information based on one or more of the following legal bases:

- **Consent** – where you have given us clear permission to process your personal data for a specific purpose.
- **Contractual necessity** – where processing is necessary to perform a contract with you or to take steps at your request before entering into a contract.
- **Legal obligation** – where processing is necessary for us to comply with a legal obligation.
- **Legitimate interests** – where processing is necessary for our legitimate business interests, unless your interests or fundamental rights override those interests.

The table below provides examples of how this data is used in connection with our processing activities:

Purpose of Processing	Personal Data Processed	Legal Basis for Processing
To issue, manage, and validate license keys	Name, email address, license key, account ID	Performance of a contract (Article 6(1)(b))

Purpose of Processing	Personal Data Processed	Legal Basis for Processing
To manage subscription details and billing	Name, email address, billing information, usage data	Performance of a contract (Art. 6(1)(b)); Legal obligation (Art. 6(1)(c))
To communicate about account or license status	Email address, account activity	Performance of a contract (Art. 6(1)(b)); Legitimate interests (Art. 6(1)(f))
To detect and prevent misuse or unauthorized access	IP address, device ID, license usage logs	Legitimate interests (Art. 6(1)(f)) – to protect our services and enforce terms

Data Transfers

Your personal information may be transferred to and processed in countries outside of the EEA or UK, including the United States. Where such transfers occur, we ensure that appropriate safeguards are in place to protect your information.

Your Rights

If you are located in the EEA or UK, you have the following rights under the GDPR:

- Right to access your personal data
- Right to rectification of inaccurate or incomplete data
- Right to erasure (right to be forgotten)
- Right to restrict processing of your personal data
- Right to data portability
- Right to object to processing based on legitimate interests or direct marketing
- Right to withdraw consent at any time (where processing is based on consent)
- Right to lodge a complaint with a supervisory authority

To exercise any of these rights, please contact us at support@luckypennysoftware.com.

Data Retention

We retain Personal Information only for as long as necessary to fulfill the purposes for which it was collected, including to comply with legal, regulatory, tax, accounting, or reporting obligations. When this data is no longer needed, we securely delete or anonymize it.

Supervisory Authorities

If you have concerns about how we handle your Personal Information, you have the right to file a complaint with a data protection authority. For example:

- In the EEA: You can contact your local supervisory authority. A list is available at: <https://edpb.europa.eu/about-edpb/board/members/en>.

- In the UK: You can contact the Information Commissioner's Office (ICO) at <https://ico.org.uk/>

19. Contact Information

If you have any questions, comments, or complaints concerning our privacy practices, please contact us by sending an email to support@luckypennysoftware.com or send correspondence via mail to:

Lucky Penny Software LLC
Company's Address: P.O. Box 596
Round Rock, TX 78680
Phone Number: (512) 200-3987