Riviera Terra Privacy Policy

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1. Introduction

1.1. Purpose of the Privacy Policy

This Privacy Policy explains how **Riviera Terra** collects, processes, stores, and protects user data. We are committed to ensuring that your personal information is handled securely and in compliance with **applicable data protection laws, including the General Data Protection Regulation (GDPR)**.

This policy applies to:

✔️ **Regular users (buyers/investors)** who browse investment listings and submit inquiries.

✔️ **B2B users (real estate developers, agencies, and sales professionals)** who create accounts and use the platform's features.

✔️ **Visitors** who access our website without registering.

By using Riviera Terra, you acknowledge and agree to the terms outlined in this Privacy Policy.

1.2. Who We Are (Company Information)

Riviera Terra is owned and operated by:

📍 **Company Name: StatesMan Sp. z o.o.**

🏢 **Registered Address:** al. Jana Pawła II 80/C16, 00-175 Warszawa, Poland

📧 **Contact Email:** support@rivieraterra.com

📞 **Phone:** +48 602 278 878

As the **data controller**, we determine how your personal data is processed in accordance with GDPR and other applicable laws.

1.3. Acceptance of the Policy

By accessing or using Riviera Terra, you:

✔️ Consent to the collection, processing, and storage of your personal data as outlined in this Privacy Policy.

✔️ Understand that your data may be processed to provide platform services (e.g., listing investments, managing leads, processing payments).

✔️ Acknowledge that Riviera Terra **may update this Privacy Policy** when necessary, and continued use of the platform after such changes constitutes acceptance of the updated policy.

If you **do not agree** with any part of this Privacy Policy, please **do not use Riviera Terra**.

2. What Data We Collect

Riviera Terra collects **different types of data** depending on how users interact with the platform. Below is a breakdown of the data collected from **regular users (buyers/investors)**, **B2B users (real estate developers, agencies, and sales professionals)**, and **automated data collection methods**.

2.1. Data Collected from Regular Users (Buyers/Investors)

Regular users do **not create accounts** but may submit inquiries regarding real estate investments. When a regular user submits an inquiry, we collect:

✔️ **Personal details:** Name, email address, and phone number.

✔️ **Inquiry details:** The investment they are interested in and the message they submit.

✔️ **Communication data:** Any responses sent between the regular user and the B2B user via the platform's messaging system.

🔷 **Why we collect this data?**

- To **forward the inquiry** to the relevant B2B user.
- To **enable communication** between the user and the real estate developer/agent.
- To **help B2B users manage leads** and track interactions.

Riviera Terra does **not** store these details for marketing purposes unless the user **explicitly opts in**.

2.2. Data Collected from B2B Users (Real Estate Developers & Sales Professionals)

B2B users **must create an account** to list properties, manage leads, and use platform features. During registration and platform use, we collect:

✔️ **Account Information:**

- Full name
- Email address
- Phone number
- Password (encrypted and not visible to us)

✔️ **Company Information:**

- Business name
- Business address
- Tax identification number (if applicable)
- Company description

✔️ **Investment Listings & Uploaded Content:**

- Property descriptions, photos, and documents.
- Floor plans and property details.
- Pricing and availability status of real estate investments.

✔️ **Lead Management Data:**

- Client inquiries and communication history.
- Messages sent and received through the platform.

✔️ **Payment Information (For Gold & Diamond Users):**

- Subscription details and payment transaction history.
- Payments processed via **Stripe** (Riviera Terra does **not store** credit card details).

🔹 **Why we collect this data?**

- To **enable user accounts and listings**.
- To **facilitate communication with potential buyers**.
- To **process subscription payments** securely via Stripe.

2.3. Automatically Collected Data (Cookies, IP Address, Analytics)

When users visit Riviera Terra, **certain data is collected automatically** to improve platform functionality and security. This includes:

✔️ **Device & Connection Data:**

- IP address
- Browser type & version
- Operating system
- Language preferences

✔️ **Website Usage Data:**

- Pages visited, time spent on the website, and actions taken.
- Clicks, form submissions, and lead interactions.

✔️ **Cookies & Tracking Technologies:**

- Session cookies to **keep users logged in**.
- Analytical cookies to **measure platform performance** (Google Analytics or similar).
- Security cookies to **prevent fraud and unauthorized access**.

🔷 **Why we collect this data?**

- To **improve platform functionality** and user experience.
- To **enhance security and detect fraud**.
- To **analyze website traffic** and optimize features.

Users can **manage cookie preferences** through their browser settings. More details are provided in the **Cookies and Tracking Technologies** section.

2.4. Data from Third-Party Integrations (Stripe, DocuSign, Firestore, Firebase Authentication)

✔️ **Stripe (Payment Processing):**

- Stripe collects and processes payment details when B2B users purchase **Gold or Diamond subscriptions**.
- Riviera Terra does **not store** credit card or banking information.
- Stripe's Privacy Policy applies: **https://stripe.com/privacy**.

✔️ **DocuSign (Digital Signatures):**

- B2B users can **send, sign, and store** contracts via **DocuSign**.
- Signed documents are stored within Riviera Terra but can also be downloaded.

- DocuSign's Privacy Policy applies: **https://www.docusign.com/privacy**.

✔️ **Firestore (Google Cloud Firestore – Data Storage):**

We use **Google Cloud Firestore** to store platform-related data such as investment listings, lead submissions, user profiles, and communication logs. Firestore is a secure, real-time cloud database hosted by **Google Cloud**, with data stored in **EU-based servers** where possible, in accordance with GDPR requirements. Firestore provides encryption both in transit and at rest and is certified under **ISO/IEC 27001, 27017, and 27018** security standards.

For more, see Firestore's privacy practices at: **https://cloud.google.com/privacy**.

✔️ **Firebase Authentication (User Login and Identity Management):**

B2B user authentication on Riviera Terra is handled by **Firebase Authentication**, a secure identity service provided by **Google Firebase**. When users register, log in, or reset their passwords, Firebase processes identifiers such as email addresses and encrypted credentials. This data is stored securely and used only to verify user identity and manage session access. Firebase Authentication complies with **GDPR**, and all personal data is protected using **end-to-end encryption and access control policies**.

More information is available at: **https://firebase.google.com/support/privacy**.

3. How We Use Your Data

Riviera Terra uses personal data to provide, improve, and secure our platform services. Below is a detailed explanation of how we use user data.

3.1. Providing and Managing Platform Services

We process user data to:

✔️ **Enable user registration and account management** for B2B users.

✔️ **Allow B2B users to create and manage investment listings** (property descriptions, images, pricing, etc.).

✔ **Facilitate lead management and communication** between buyers and real estate professionals.

✔ **Enable document storage and digital signatures** for real estate transactions.

✔ **Ensure compliance with our Terms and Conditions** and **prevent fraud or misuse** of the platform.

◆ **Legal Basis: Performance of a contract** – we process data to provide the agreed-upon services.

3.2. Communication Between Users (Leads & Messaging System)

Riviera Terra facilitates communication between **potential buyers and real estate professionals** via the Leads Management System. We use data to:

✔ **Deliver inquiries from regular users (buyers/investors) to B2B users (real estate developers/agents).**

✔ **Send messages from B2B users to potential buyers** (messages are sent as emails).

✔ **Store conversation history** so B2B users can track interactions.

◆ **Legal Basis: Legitimate interest** – facilitating professional real estate transactions.

3.3. Processing Payments (For Gold & Diamond Plans)

We process payment-related data to:

✔ **Enable secure subscription payments** for B2B users.

✔ **Provide invoices for completed transactions.**

✔ **Handle refunds, cancellations, and payment disputes.**

◆ **Legal Basis: Performance of a contract** – necessary to manage **paid subscriptions**.

💳 **Payment Security:** All transactions are handled via **Stripe**, and Riviera Terra **does not store credit card information**.

3.4. Sending Legal Documents (DocuSign Integration)

When a B2B user sends contracts or agreements for digital signing, we:

✔️ **Store signed documents securely within the platform.**

✔️ **Enable downloading of signed agreements.**

✔️ **Ensure compliance with DocuSign's security and authentication policies.**

🔷 **Legal Basis: Performance of a contract** – necessary for real estate transactions.

⚠️ **User Responsibility:** B2B users must **verify the legal validity** of signed documents in their jurisdiction.

3.5. Marketing, Advertising, and Promotional Communications

If users opt-in, we may use their data to:

✔️ **Send platform updates, newsletters, and promotional offers.**

✔️ **Provide real estate industry insights and market trends.**

✔️ **Offer special discounts or premium features.**

🔷 **Legal Basis: User consent** – users must opt-in to receive marketing emails.

Opt-Out Option: Users can **unsubscribe at any time** using the **"Unsubscribe"** link in emails.

3.6. Improving Platform Functionality and Security

We analyze usage data to:

✔️ **Enhance platform performance** and optimize the user experience.

✔️ **Detect and prevent fraudulent activities** (e.g., fake listings, spam messages).

✔️ **Fix bugs and technical issues** that affect service quality.

🔷 **Legal Basis: Legitimate interest** – ensuring platform security and usability.

🛡️ **Security Measures:** We implement **encryption, access controls, and fraud detection systems** to protect user data.

4. Legal Basis for Processing Personal Data

Under the **General Data Protection Regulation (GDPR)**, Riviera Terra must have a **legal basis** for collecting and processing personal data. The legal bases we rely on depend on how users interact with our platform.

4.1. Performance of a Contract (Providing Services to B2B Users)

We process data **to fulfill our contractual obligations** when users create accounts, list properties, and use platform features.

✔️ **Examples:**

- Registering B2B users and enabling account access.
- Managing investment listings and leads.
- Processing subscription payments for Gold and Diamond plans.
- Facilitating document management and digital signatures.

📌 **Legal Justification:** Article 6(1)(b) GDPR – "Processing is necessary for the performance of a contract."

4.2. User Consent (For Marketing & Communication Preferences)

We obtain user **consent** before processing data for:

✔️ **Marketing emails and promotional content.**

✔️ **Personalized advertising and remarketing campaigns.**

✔️ **Optional user surveys and feedback requests.**

Users **must actively opt-in** to receive marketing communications. They can **withdraw consent at any time** by:

✔️ Clicking **"Unsubscribe"** in emails.

✔️ Updating notification preferences in account settings.

✔️ Contacting **support@rivieraterra.com**.

📌 **Legal Justification:** Article 6(1)(a) GDPR – "Processing is based on user consent."

4.3. Legitimate Interests (Fraud Prevention, Service Optimization)

We process certain data based on **legitimate business interests**, provided that these do not override user rights.

✔️ **Examples:**

- Improving platform functionality and user experience.
- Preventing fraud, spam, and abuse.
- Ensuring platform security and data integrity.
- Analyzing website traffic and engagement for performance insights.

📌 **Legal Justification:** Article 6(1)(f) GDPR – "Processing is necessary for legitimate interests pursued by the controller."

⚠️ **User Rights:** If users object to processing based on legitimate interest, they may **contact us to restrict processing** of their data.

4.4. Legal Compliance (GDPR, Tax, and Business Regulations)

We process personal data **to comply with legal obligations**, including:

✔️ **Tax and financial record-keeping** (for payments processed via Stripe).

✔️ **Responding to legal requests, investigations, or audits.**

✔️ **Enforcing Terms and Conditions to protect platform integrity.**

📌 **Legal Justification:** Article 6(1)(c) GDPR – "Processing is necessary for compliance with a legal obligation."

5. Data Sharing and Third-Party Services

Riviera Terra **does not sell or rent user data** to third parties. However, we share certain data with **trusted service providers** to enable platform functionalities, process payments, and comply with legal obligations. Below are the specific cases where data may be shared.

5.1. Payment Processing via Stripe

For B2B users who subscribe to **Gold or Diamond plans**, all payments are securely processed via **Stripe**.

✔️ **What Data is Shared?**

- Name, email, and billing information.
- Transaction details (amount, date, payment method).
- Payment verification and fraud prevention data.

✔️ **Why?**

- To securely process **subscription payments** and generate **invoices**.
- To detect **fraudulent transactions** and prevent unauthorized activity.

⚠️ **Riviera Terra does not store payment card details.**

For Stripe's privacy policy, visit: **https://stripe.com/privacy**

5.2. Digital Signatures via DocuSign

Riviera Terra integrates **DocuSign** to facilitate **electronic signatures** for real estate contracts.

✔️ **What Data is Shared?**

- User's name and email (to generate a digital signature request).
- Contract details (document sent for signature).
- Signing status (whether the document has been signed, rejected, or completed).

✔️ **Why?**

- To allow B2B users to **send legally binding contracts** for digital signatures.
- To ensure that signed documents are **securely stored and accessible**.

⚠️ **Riviera Terra does not control the legal enforceability of contracts signed via DocuSign.**

For DocuSign's privacy policy, visit: **https://www.docusign.com/privacy**

5.3. Cloud Hosting and Data Storage Providers

We store user data on **secure servers** provided by **trusted cloud hosting providers** within the **European Union (EU)** to ensure **GDPR compliance**.

✔️ **What Data is Stored?**

- User account details and login credentials.
- Investment listings, lead communications, and uploaded documents.
- Analytics and performance logs.

✔️ **Why?**

- To securely store user data and ensure platform reliability.
- To prevent **data loss, breaches, or unauthorized access**.

⚠️ All data is **encrypted** and protected using **industry-standard security measures**.

5.4. Business Transfers or Legal Obligations (If Required by Law)

We may disclose user data if required by:

✔️ **Law enforcement agencies, regulatory bodies, or government authorities** (for legal compliance).

✔️ **Business acquisitions or mergers** (if Riviera Terra is acquired by another company).

⚠️ If a business transfer occurs, users will be **notified** before their data is transferred to a new entity.

5.5. Third-Party Service Providers for Analytics & Performance Tracking

We use third-party analytics tools (e.g., **Google Analytics**) to monitor **platform usage, user behavior, and performance trends**.

✔️ **What Data is Collected?**

- IP addresses and device/browser details.
- Pages visited and time spent on the platform.
- Clicks, form submissions, and interactions.

✔️ **Why?**

- To optimize the platform's user experience.
- To detect and resolve technical issues.

Users can opt-out of Google Analytics tracking by adjusting their **cookie settings**.

5.6. Firestore (Google Cloud Firestore – Data Storage):

Riviera Terra uses Firestore, a cloud-based database service by Google Cloud, to store platform data such as user profiles, listings, and messages. Firestore acts as a subprocessor and stores data on secure, GDPR-compliant servers. All data is encrypted and access is strictly controlled.

5.7. Firebase Authentication (User Identity Management):

We rely on Firebase Authentication, provided by Google Firebase, to manage B2B user login and identity verification. Firebase processes login credentials and related metadata as a subprocessor, ensuring data is securely managed in accordance with GDPR and industry security standards.

Summary: When We Share Data and Why

Service	Purpose	Data Shared
Stripe	Payment processing	Billing details, transaction history
DocuSign	Digital signatures	User email, document details
Cloud Hosting	Secure data storage	User accounts, listings, messages
Legal Authorities	Compliance with laws	Only if required by law
Analytics Tools	Platform performance analysis	IP, device/browser data, user activity

Firestore (Google)	Cloud database storage	Platform and user data
Firebase Authentication	User login and access control	Login credentials, email address

6. How Long We Keep Your Data

Riviera Terra retains user data only for as long as necessary to provide services, comply with legal obligations, and improve platform functionality. The retention period varies depending on the type of data and the purpose for which it was collected.

6.1. Account Data Retention Policy

✔️ **Active Accounts:**

- As long as a user actively uses the platform, their account and associated data are retained.

✔️ **Inactive Accounts (No Login for 24 Months):**

- If a B2B user has not logged in for **24 months**, their account may be **deactivated** and eventually **deleted** after notification.

✔️ **User-Initiated Account Deletion:**

- If a B2B user **requests account deletion**, all personal data will be permanently erased **within 30 days**, except for legally required records.

6.2. Communication and Lead Data Retention

✔️ **Messages & Leads Data (B2B Users):**

- Stored for **12 months** after the last interaction, unless the B2B user manually deletes them.
- Deleted automatically after **2 years of inactivity** to ensure data minimization.

✔️ **Regular User (Buyer/Investor) Inquiry Data:**

- Contact details and messages are stored for **6 months** after the last interaction.
- Data is deleted if no further engagement occurs.

6.3. Financial Transaction Records Retention

✔️ **Payment & Invoicing Data (Processed via Stripe):**

- Retained for **5 years** as required for financial audits, tax reporting, and legal compliance.

✔️ **Subscription History:**

- Stored indefinitely for **billing history and dispute resolution**.

6.4. User-Requested Data Deletion

Users can request data deletion by contacting **support@rivieraterra.com**. Upon verification, we will:

✔️ **Permanently delete account-related data** (except legally required records).

✔️ **Remove listings, leads, and messages** from the system.

✔️ **Retain financial transaction data** for legal compliance.

⚠️ **Exception:** If a user is involved in a pending dispute or regulatory request, we may delay deletion until the issue is resolved.

Summary of Data Retention Periods

Data Type	Retention Period	Deletion Trigger
Active Accounts	Indefinite	Until user requests deletion
Inactive Accounts	24 months	After notification
Lead & Message Data	12 months	Auto-deleted after 2 years of inactivity
Regular User Inquiries	6 months	Auto-deleted if no interaction
Financial Records (Stripe)	5 years	Legal compliance requirement
Subscription History	Indefinite	Kept for billing disputes

7. Your Rights Under GDPR

If you are a resident of the **European Economic Area (EEA)** or your data is processed by Riviera Terra in the **EU**, you are entitled to certain rights under the **General Data Protection Regulation (GDPR)**.

Riviera Terra is committed to respecting your rights and ensuring transparency in how your data is used.

7.1. Right to Access (Request a Copy of Your Data)

✔️ You have the right to request a copy of the personal data that Riviera Terra holds about you.

✔️ We will provide this information **free of charge** within **30 days** of your request.

📌 **How to exercise this right?**

Send a request to **privacy@rivieraterra.com** with the subject **"Data Access Request"**.

7.2. Right to Rectification (Update Incorrect Data)

✔️ If your data is **inaccurate or incomplete**, you have the right to request corrections.

✔️ B2B users can update **account details, company information, and listings** in their **Admin Panel**.

📌 **How to exercise this right?**

If you cannot update certain details yourself, contact **support@rivieraterra.com**.

7.3. Right to Erasure ("Right to Be Forgotten")

✔️ You have the right to request that your personal data be permanently deleted.

✔️ This applies when:

- Your data is **no longer necessary** for the purposes collected.
- You withdraw consent (for marketing communications).
- You object to processing, and there is **no overriding legitimate interest**.

⚠️ **Exceptions:**

- Riviera Terra may **retain certain data** if required for **legal or financial compliance** (e.g., tax regulations).
- Lead communications and property transactions involving third parties may **not** be deleted if legally necessary.

📌 **How to exercise this right?**

Send a request to **privacy@rivieraterra.com** with the subject **"Data Deletion Request"**.

7.4. Right to Restrict Processing (Limit How We Use Your Data)

✔️ You can request **temporary restrictions** on data processing if:

- You contest the accuracy of your data.
- The processing is unlawful, but you don't want the data deleted.
- You have objected to processing, and verification is pending.

📌 **How to exercise this right?**

Contact **privacy@rivieraterra.com** with the subject **"Processing Restriction Request"**.

7.5. Right to Data Portability (Transfer Data to Another Service)

✔️ You have the right to **receive a copy of your personal data in a structured, commonly used format** (e.g., CSV, JSON).

✔️ You can request that we transfer your data to another service provider.

📌 **How to exercise this right?**

Send a request to **privacy@rivieraterra.com** with the subject **"Data Portability Request"**.

7.6. Right to Object (To Marketing or Certain Processing Activities)

✔️ You can **object to the processing of your data** for:

- **Marketing emails or promotional content** (opt-out option is available in emails).
- Processing based on **legitimate interest**, unless we have **compelling reasons** to continue.

📌 **How to exercise this right?**

- Click the **"Unsubscribe"** link in marketing emails.
- For other objections, contact **privacy@rivieraterra.com** with the subject **"Objection to Processing"**.

7.7. How to Exercise Your Rights (Contact Details)

To exercise any GDPR rights, contact:

📧 **Email: privacy@rivieraterra.com**

📞 **Phone:** +48 602 278 878

We will respond within **30 days**, as required by GDPR. If additional time is needed, we will notify you.

If you are **not satisfied** with our response, you have the right to **file a complaint** with your country's **Data Protection Authority (DPA)**.

📌 **For EU users:**

You can find your national DPA here: **https://edpb.europa.eu/about-edpb/board/members_en**

Summary of GDPR Rights

Right	What It Means	How to Request
Access	Get a copy of your personal data	Email: privacy@rivieraterra.com
Rectification	Correct inaccurate or incomplete data	Admin Panel / Email support

Erasure	Request deletion of personal data	Email: privacy@rivieraterra.com
Restriction	Limit processing of your data	Email: privacy@rivieraterra.com
Portability	Transfer data to another service	Email: privacy@rivieraterra.com
Objection	Stop data processing (e.g., marketing)	"Unsubscribe" link or Email

8. Cookies and Tracking Technologies

Riviera Terra uses **cookies and similar tracking technologies** to enhance user experience, improve platform performance, and analyze visitor behavior. This section explains what cookies we use, why we use them, and how users can control their cookie preferences.

8.1. What Cookies We Use

Cookies are small text files stored on your device when you visit our website. We use the following types of cookies:

✔️ **Essential Cookies (Strictly Necessary)**

- Required for the **basic functionality** of the platform.
- Help with **user authentication, security, and fraud prevention**.
- Example: Keeping B2B users logged into their accounts.

✔️ **Performance & Analytics Cookies**

- Help us analyze **how users interact with the platform** (e.g., most visited pages, time spent on site).
- Allow us to **improve platform features and usability**.

- Example: Google Analytics cookies to measure visitor traffic.

✔️ **Functionality Cookies**

- Store **user preferences and settings** (e.g., language selection, saved search preferences).
- Improve personalization for returning users.

✔️ **Advertising & Marketing Cookies**

- Used for **targeted advertising** and remarketing campaigns.
- Allow us to track **effectiveness of promotional campaigns**.
- Example: Facebook Pixel and Google Ads tracking cookies.

8.2. How to Manage or Disable Cookies

Users can **accept, decline, or customize cookie settings** when they first visit Riviera Terra.

✔️ **Browser Settings:** Users can control cookie preferences through their browser:

- **Google Chrome**: Manage Cookies
- **Mozilla Firefox**: Manage Cookies
- **Safari**: Manage Cookies
- **Microsoft Edge**: Manage Cookies

✔️ **Opt-Out of Analytics & Ads Tracking:**

- **Google Analytics:** Opt-Out Here
- **Facebook Ads:** Manage Preferences

⚠️ **Note:** Disabling essential cookies may affect the **functionality of the platform**, including login access and lead management.

8.3. Third-Party Analytics and Tracking (Google Analytics, etc.)

We use third-party analytics tools to **monitor site traffic and improve user experience**:

✔️ **Google Analytics:** Tracks **visitor behavior, referral sources, and page performance**.

✔️ **Facebook Pixel & Google Ads:** Used for **advertising campaign optimization**.

✔️ **Hotjar (if used):** Captures **session recordings and heatmaps** for UX improvements.

These tools may collect **IP addresses, device/browser info, and usage data**, but **do not identify users personally**.

📌 **How to Opt-Out?** Users can adjust settings via their **browser** or opt out using links in **8.2** above.

Summary of Cookies Used

Cookie Type	Purpose	Can Be Disabled?
Essential Cookies	Authentication, security, fraud prevention	❌ No
Performance Cookies	Platform analytics and error tracking	✅ Yes
Functionality Cookies	User preferences (language, saved searches)	✅ Yes
Advertising Cookies	Targeted marketing & remarketing	✅ Yes

9. Data Security Measures

Riviera Terra is committed to protecting user data and implementing **industry-standard security practices** to prevent unauthorized access, data breaches, and fraud.

9.1. Encryption and Secure Data Storage

✔️ **Data Encryption:**

- All user data is encrypted **in transit and at rest** using industry-standard **SSL/TLS encryption**.
- Passwords are securely stored using **one-way encryption (hashing + salting)**, ensuring they **cannot be decrypted**.

✔️ **Data Storage & Hosting:**

- All data is stored on **secure cloud servers located in the European Union (EU)**, ensuring **GDPR compliance**.
- Regular **backups** are performed to prevent data loss.

9.2. Payment Security via Stripe

✔️ **Secure Payment Processing:**

- All payments are handled via **Stripe**, a **PCI-DSS Level 1** certified payment provider.
- Riviera Terra **does not store** credit card details—Stripe handles all transactions securely.

✔️ **Fraud Protection:**

- Stripe automatically detects and **prevents suspicious transactions**.
- Riviera Terra monitors **unusual subscription activity** to prevent fraudulent sign-ups.

📌 **For more details, see Stripe's Security Policy: https://stripe.com/docs/security**

9.3. Measures to Prevent Unauthorized Access or Breaches

✅ **User Authentication & Account Security:**

- B2B users must use **strong passwords**, and accounts are protected by secure login authentication.
- **Repeated failed login attempts** trigger **temporary account lockouts** to prevent brute-force attacks.

✅ **Access Controls & Role-Based Permissions:**

- Only **authorized personnel** have access to critical system functions and sensitive user data.
- B2B users on Gold and Diamond plans can **assign roles** to team members with limited access.

✅ **Regular Security Audits & Monitoring:**

- The platform undergoes **regular security audits** and vulnerability assessments.
- Automated systems detect **unauthorized access attempts** and block suspicious activity.

✅ **Incident Response Plan:**

- In the event of a **security breach**, affected users will be notified **within 72 hours**, in compliance with **GDPR regulations**.
- Affected accounts will be temporarily suspended to prevent further damage.

Summary of Security Measures

Security Measure	Purpose
SSL/TLS Encryption	Protects data in transit
Encrypted Password Storage	Prevents unauthorized password recovery

GDPR-Compliant Hosting (EU)	Ensures secure data storage
Secure Payments via Stripe	Prevents fraud & unauthorized transactions
Access Control & Role Management	Restricts unauthorized platform actions
Regular Security Audits	Identifies and mitigates potential vulnerabilities

10. Data Transfers Outside the EU

Riviera Terra primarily stores and processes user data **within the European Union (EU)** to ensure compliance with **GDPR regulations**. However, in certain cases, data may be transferred outside the EU to trusted third-party service providers. This section explains how we handle such transfers and what safeguards are in place.

10.1. How We Ensure GDPR Compliance in Non-EU Data Transfers

When transferring data outside the EU, we ensure that:

✔ The recipient country has **adequate data protection laws**, as determined by the European Commission.

✔ The recipient organization has **appropriate security measures** in place.

✔ We use legally binding **Standard Contractual Clauses (SCCs)** or other approved mechanisms for data protection.

10.2. Third-Party Services and Cross-Border Data Processing

✅ **Stripe (Payment Processing)** – **Servers in the U.S. and other locations**

- Stripe may process payment data outside the EU but complies with **GDPR and PCI-DSS** security standards.
- Safeguard: Stripe uses **Standard Contractual Clauses (SCCs)** and has **Privacy Shield Certification** (if applicable).
- More info: **https://stripe.com/privacy**

✅ **DocuSign (Digital Signatures)** – **Servers in the U.S. and other locations**

- DocuSign may process signed documents outside the EU, but ensures GDPR compliance.
- Safeguard: **Standard Contractual Clauses (SCCs) and encryption** for document security.
- More info: **https://www.docusign.com/trust/privacy**

✅ **Cloud Hosting & Analytics Providers**

- Some of our third-party analytics or hosting providers may have **data centers outside the EU**.
- Safeguard: We only use providers that comply with GDPR and implement **robust security measures**.

✅ **Firestore (Google Cloud Firestore – Data Storage):**

Firestore is part of **Google Cloud Platform**, which may process data on servers located **outside the European Union**, including in the **United States**. When using Firestore, Riviera Terra ensures that appropriate **Standard Contractual Clauses (SCCs)** and **Google's Data Processing Addendum** are in place to maintain GDPR compliance. All stored data is encrypted and access-controlled.

✅ **Firebase Authentication (User Identity Management):**

Firebase Authentication, also operated by **Google**, may process login and identity-related data outside the EU. Google implements **SCCs and other safeguards** to ensure compliance with GDPR when processing data internationally. Riviera Terra ensures that only the **minimum necessary data** is transmitted and that **all authentication data is encrypted in transit and at rest**.

10.3. User Rights and Data Protection for Cross-Border Transfers

✔️ Users have the **right to know** if their data is transferred outside the EU.

✔️ Users can **request details** on the security measures used for their data transfers.

✔️ If a user objects to **non-EU data transfers**, they may contact **privacy@rivieraterra.com** to request restrictions.

Summary of Non-EU Data Transfers & Safeguards

Service	Data Transferred	Location	Safeguards in Place
Stripe	Payment processing data	U.S. & other locations	**GDPR Compliance, SCCs, PCI-DSS Security**
DocuSign	Signed documents & contract metadata	U.S. & other locations	**GDPR Compliance, SCCs, Encryption**
Cloud Hosting	User accounts & listings	Varies by provider	**GDPR-Compliant Hosting**
Firestore (Google Cloud)	Platform data, user content, leads	U.S. & other locations	**Standard Contractual Clauses (SCCs), encryption, GDPR-compliant hosting**
Firebase Authentication	Login credentials, email metadata	U.S. & other locations	**Standard Contractual Clauses (SCCs), end-to-end encryption, limited access**

11. Children's Privacy

Riviera Terra is a **business-to-business (B2B) platform** designed for **real estate professionals**, and it is **not intended for use by children**. We do not knowingly collect or process personal data from individuals under the age of **18**.

11.1. Riviera Terra Is Not Intended for Users Under 18

✔️ **Age Restriction:**

- Users must be **at least 18 years old** to create an account or use any of Riviera Terra's services.
- By registering on Riviera Terra, users confirm that they are **18 years of age or older**.

✔️ **Real Estate Transactions & Legal Contracts:**

- Since Riviera Terra facilitates **real estate investments, lead management, and digital contracts**, its services are intended **only for legal adults** who can **enter into legally binding agreements**.

11.2. No Intentional Collection of Data from Minors

✔️ **We do not knowingly collect or process** any personal data from individuals under 18.

✔️ If we become aware that a minor has provided personal data, we will:

- **Immediately delete** the data.
- **Restrict access** to the platform.

✔️ If a parent or legal guardian believes their child's data has been mistakenly collected, they should contact **privacy@rivieraterra.com** to request deletion.

11.3. How We Prevent Underage Users from Accessing the Platform

✓ **Age Verification:**

- During registration, users confirm that they are **18 or older**.
- If necessary, we may **request additional verification** (e.g., business registration details for B2B users).

✓ **Reporting Underage Users:**

- If any user **suspects that a minor is using Riviera Terra**, they should report it to **support@rivieraterra.com**.

Summary of Children's Privacy Policy

Policy	Details
Minimum Age Requirement	Users must be **18+** to register or use the platform.
No Intentional Data Collection	We do not knowingly collect or store data from minors.
Parental Rights	Parents can request data deletion if they suspect a minor's data was collected.
Age Verification	Users confirm they are 18+ during registration.
Reporting	Concerns about underage users can be sent to **support@rivieraterra.com**.

12. Changes to This Privacy Policy

Riviera Terra reserves the right to update or modify this **Privacy Policy** at any time to reflect changes in **laws, regulations, business operations, or platform features**.

12.1. Right to Modify the Policy

✔️ We may update this Privacy Policy **periodically** to ensure compliance with:

- New **data protection laws and regulations** (e.g., GDPR updates).
- Changes in our **services, data processing practices, or third-party integrations**.
- Security improvements to better protect user data.

✔️ We will always ensure that the latest version of this Privacy Policy is **publicly available** on our website.

12.2. Notification of Significant Changes

✔️ If we make **material changes** to this Privacy Policy (e.g., new data processing activities, changes in user rights), we will:

- Send an **email notification** to all registered B2B users.
- Display a **notice on the platform** at least **30 days before** changes take effect.
- Request **user consent** again if the changes require it (e.g., for marketing or data transfers).

✔️ If users **do not agree** with the updated policy, they have the right to:

- **Stop using the platform** before the changes take effect.
- **Request account deletion** by contacting **privacy@rivieraterra.com**.

✔️ Continued use of Riviera Terra after updates means **acceptance of the revised Privacy Policy**.

Summary of Changes and User Rights

Change Type	User Notification	User Action Required?
Minor updates (clarifications, formatting)	No notification required	No
Changes affecting user rights or data usage	Email + platform notice	Yes, if consent is required
Security & compliance updates	Platform notice	No

13. Contact Information for Privacy Concerns

If you have any questions about this Privacy Policy, concerns about how your data is processed, or wish to exercise your **GDPR rights**, you can contact us using the details below:

13.1. How to Contact Riviera Terra's Data Protection Team

📍 **Company Name:**

StatesMan Sp. z o.o.

🏢 **Registered Address:**

al. Jana Pawła II 80/C16, 00-175 Warszawa, Poland

📧 **Email for Privacy & Data Protection Inquiries:**

privacy@rivieraterra.com

📞 **Phone Support:**

+48 602 278 878

🌐 **Website:**

www.rivieraterra.com

📌 **When to Contact Us?**

✔️ If you have **questions** about how your data is collected or used.

✔️ If you want to **exercise your GDPR rights** (access, correction, deletion, etc.).

✔️ If you suspect **a security issue** or **unauthorized data access**.

✔️ If you want to **update or withdraw consent** for marketing communications.

13.2. How to File a Complaint with a GDPR Authority

If you believe that Riviera Terra has violated **your data protection rights**, you have the right to file a complaint with the relevant **Data Protection Authority (DPA)**.

📌 **For EU users:**

Find your national DPA here: **https://edpb.europa.eu/about-edpb/board/members_en**

📌 **For non-EU users:**

Contact your local data protection authority or email us at **privacy@rivieraterra.com**, and we will assist you.

Summary of Contact Options

Purpose	Contact Method
General privacy inquiries	**privacy@rivieraterra.com**
Requesting GDPR rights (access, deletion, etc.)	**privacy@rivieraterra.com**
Reporting a data breach or security issue	**privacy@rivieraterra.com**
Complaints to a Data Protection Authority	[Find your local DPA](#)