

# Privacy Policy

## What This Policy Covers

Your privacy is important to us. Our goal is to be completely transparent with you. This is intended to help you understand (1) the core principles of our privacy policy, (2) the ways we obtain your information, (3) the types of information we collect and process, (4) the legal grounds for collecting and processing, (5) the purposes of collecting and processing, (6) how we share your information, (7) how we store your information, (8) how we protect your information, (9) your rights, (10) any changes made to our privacy policy, (11) and lastly it is to provide our contact information.

By visiting our Website you accept the privacy rules described in this Policy.

## 1. Core Principles

We process your personal data on according to the laws in a transparent, fair, and accurate manner. That means (1) We inform you what information we collect and what processing occurs to it (the principle of transparency), (2) The processing is matched to the description given in this Privacy Policy (the principle of fairness), (3) The processing is for one of the purposes described below (the principle of lawfulness), and (4) The data are accurate, kept current, collected within the minimum of the scope needed to provide the Services on an appropriate level, limited by the purposes set below, and stored during the time, limited by these purposes (the principle of accuracy).

- We do not sell your personal information to anyone.
- We do not transfer your personal information to anyone for their own purposes, unless you have granted us your express consent to do so.
- We guarantee the security and confidentiality of your personal data.
- We will choose what emails to include in your newsletter if you have subscribed to one. No other profiling or automated decision-making activities we do.

## 2. Ways We Obtain Information

We collect information about you (1) from our Website, and by means of our Services, (2) from e-mail, text, and other electronic messages between you and us, (3) from third parties, including but not limited to social media (e.g. LinkedIn, Google, Facebook) and other integrated services, (4) from conferences and other events.

We do not have a direct relationship with the individuals whose personal data we host as a part of our Clients' data. In this case, we are the Processor of personal data. Our Clients are responsible for the notification to such individuals concerning the purposes of and processing activities. As the Processor, we process your information according to the Data Processing Agreement within the scope of and for the purposes limited by our Terms of Service.

## **Types of Information We Collect and Process**

We collect and process the following information and use it only as described below:

**Personal Information.** This may include your full name, email address, phone number, photo, social media profile, and other information that you may provide us when you interact with our Website, or we collect through other means as set forth herein. We collect and process the information to inform you about our company, our services and products.

**Sensitive and Child Information.** We do not collect sensitive personal data and child data. The term "sensitive personal data" means information needing special treatment, including in some circumstances the need to obtain explicit consent. These categories may include personal identity numbers, financial account information, racial or ethnic origin, political opinions, religious, philosophical or other similar beliefs, membership in a trade union, or membership in a professional or trade association, physical or mental health, biometric or genetic data, sexual behavior, or criminal record (including information about suspected criminal activities) according to the various categories of personal data identified by European Union and other data privacy laws. The term "child data" refers to information about an individual under 16 years of age.

**Usage Information.** This includes information about your activity on our Website, the device used, pages viewed, referral source, your IP address, browser type, identifiers associated with your devices, dates of visits, time spent on the Website, and other traffic data.

**Location Information.** Your devices, depending on their settings, may transmit location information. We may use your location information for analysis and to better provide services based on the specific needs of our Clients.

**Analytics Information.** We collect analytics information when you use our Website. We do it to provide you with analytics information and to improve our product and services. To do analytics we use certain analytics providers, which are comply with GDPR requirements. The range of our analytic providers together with links to their

privacy policies are listed below. The list will be updated as new providers are added.

- Google Analytics
- Google Tag Manager
- Facebook
- LinkedIn

**Email Content Information.** We collect and process the information sent by our Clients through our Website and marketing automation services. Such information may include documents, links, list of contacts, recipients' email addresses, message subject, and other information sent by our Clients through our Service. We do not store the body of the message after the message is sent.

**Cookies and Other Technologies.** When you view our Website, we may also store certain information on your computer in the form of a cookie file. We use online identifiers, including cookie identifiers, internet protocol addresses, device identifiers, client identifiers, email cookies, name cookies, time cookies, and other similar technologies to measure the use of our Website and improve its content, to present you with retargeting advertising on other sites based on your previous interaction, and to customize your experience and provide greater convenience each time you interact with us.

A cookie is a small amount of data that often includes a unique identifier that is sent to the browser of your computer, tablet, or mobile phone (referred to here as a "device") from a website and is stored on your device's hard drive. Each website can send its own cookie to your browser if your browser's preferences allow it, but to protect your privacy, your browser generally only permits a website to access the cookies it has already sent to you, not the cookies sent to you by other websites. Many websites send cookies whenever a user visits in order to track online traffic flows.

If you wish to block or erase the use of cookies, then please refer to the relevant instructions in your web browser.

### **3. Legal Ground**

**Consent.** We process your personal data on the basis of the consent you granted to us when you fill forms of feedback in our Website.

**Legitimate Interest.** We process your personal data for our legitimate interests, as the processing of personal data is a part of our business model, is necessary to

provide the services, to perform analytics, to improve our relationships with clients, and to understand how our Clients interact with the Website.

#### **4. Purposes**

**Compliance.** We use the information we collect and process to enforce compliance to protect the rights and safety of our Clients and third parties, as well as our own. This may include developing tools and algorithms that help us prevent violations.

**Marketing.** We use the collected information for various marketing purposes, including managing, tracking, enhancing, and personalizing our marketing efforts, developing and presenting advertisements tailored to your interests, and sending you personalized newsletters. The collected information is also used for our internal purposes (such as auditing, data analysis, and research to improve and develop our products, services, content, advertising, and communications).

**Analytics.** We collect the information from the Website and third-party tools such as Google Analytics to analyze the behavior of our Clients and other Website audience. By estimating the usage patterns and size of our Client audience and other audience, we are able to customize our Website to suit your interests and needs.

#### **5. Sharing**

We may collect and disclose anonymous and aggregated information that does not identify any individual, without restriction, for the purposes of Service research, to improve our Website, and for other commercial purposes.

We share the information with our employees. They treat your personal data with the greatest security. They are committed to keeping our internal security policies concerning working with personal data as stated in the Service Agreement you entered with us.

We share the information with certain trusted third parties listed below to help us provide, improve, promote, and protect our services. The range of such third parties together with links to their privacy policies are listed below. The list will be updated as new providers are added.

- Google Analytics
- Google Tag Manager
- Facebook
- LinkedIn
- Linked Helper

- LinkedIn Sales Navigator
- TextAu
- FindThatLead

We share the information to comply with any court order, law or legal process, including to respond to any government or regulatory agency request.

If we are involved in a reorganization, merger, acquisition, or sale of our assets, your information may be transferred as part of that deal.

We do not share personal information with third parties for their marketing or commercial purposes.

## **6. Protection**

Your personal information is contained behind secured networks and is only accessible to a limited number of persons who have special access rights to such systems and are required to keep the information confidential according to this Policy, our internal policies, laws, and agreements. We prevent unauthorized access to the personal data by the following means: (1) by implementing our password policy; (2) by use of traditional firewall rules and instruments; (3) by encryption of data; (4) by including Virtual Private Network (VPN) and Virtual Private Cloud (VPC) implementations; (5) by implementing antivirus systems.

We utilize HTTPS (also referred to as SSL or TLS), SSH and STTP encryption. Our HTTPS implementation employs industry standard algorithms and certificates.

We also maintain relationships with industry-recognized, penetration-testing service providers for quarterly penetration tests. The intent of each penetration test is to identify and resolve foreseeable attack vectors and potential abuse scenarios.

Backup and replication strategies are designed to ensure redundancy and failover protections during a significant processing failure.

## **7. Your Rights**

The right to information. We notify you that we process your personal data, the scope of your personal data we process, the purposes and the term of processing, as well as the place of storage of personal data and security measures we apply for the transfer and storage of data.

**The right to withdraw consent.** At any time you may withdraw your consent given to us for processing of your personal data by contacting us. However, be informed that you cannot withdraw your consent to processing that has already happened on a basis of your consent.

**The right to access.** You have the right to access your personal data by contacting us. We may provide you with such access, or we may send you a copy of such data.

**The right to rectification.** You may update or correct the personal data by correcting it by contacting us.

**The right to be forgotten.** You may delete your data by asking us to delete your personal data if the data are not longer needed for their original purposes you gave a consent for or you withdraw your consent. We also delete your personal data automatically after the term of processing is expired, or after the purpose of processing no longer exists.

**The right to restriction of processing.** You may restrict our processing of your data in the following cases: (1) Your personal data is not accurate and by contacting us there were no changes made during the term we agreed; (2) The processing is unlawful; (3) The purpose of processing set herein is fulfilled; (4) You restrict it in accordance with your right to object.

**The right to notification.** We notify you of specific activities with your personal data not mentioned herein, including getting your consent to share it with other parties for their marketing purposes, and notify the third parties, which provide the service to us related to processing of your personal data, about your exercising of your right to alter, remove, or restrict your personal data.

**The right to data portability.** You may request a copy of your personal data in a useful electronic format by contacting us.

**The right to object.** You may object to specific types of processing, particularly direct marketing. If you do not wish to have your personal information used by us to promote our product or services, you can opt out by sending us an email stating your request. If we have sent you a promotional email, you may unsubscribe - send us a return email asking to be omitted from future email distributions.

Prior to give effect to your rights we verify your identity as we treat our clients and want to make sure their data are kept safe. We may request you to provide us additional information necessary to identify you.

## **8. Changes to Privacy Policy**

We may modify this Privacy Policy from time to time, and we will post the most current version on our Website. If a modification meaningfully reduces your rights, we will notify you by sending you a message.