

# Privacy Policy

We take your privacy seriously. Ozekon (“we”, or “our”, or “us”) has created this Privacy Policy to explain how we collect, store, use and protect your information. This Privacy Policy explains our information handling practices when you use our communication services, interact with our website, or interact with us directly (collectively the “Services”).

This Privacy Policy is incorporated into, and considered a part of, the Terms of Service, and any terms not defined herein have the meanings ascribed to them in the Terms of Service. This Privacy Policy and the Terms of Service govern the collection of information and use of the Services offered by Ozekon, and by using the Services you are giving Ozekon permission to use and store such information consistent with this Privacy Policy and the Terms of Service.

## 1. Acceptance of Policy

By accessing or using the Services, you do hereby warrant and represent that you have read, understand and agree to all terms and conditions stated herein, and our Terms of Service, currently available at <https://ozekon.io/tos> (the “Terms of Service”).

If you do not agree with or you are not comfortable with any aspect of this Policy, you should immediately discontinue access or use of our Services.

## 2. Notification of Changes

Ozekon’s Privacy Policy is periodically reviewed, and might change as Ozekon updates and expands the Services. Ozekon will endeavor to notify you directly of any material changes, and will post a notice of any non material changes on our website. Once the new Policy is posted, the Policy will become effective after your continued use of the Services.

Ozekon encourages you to review this Privacy Policy periodically.

## 3. Our Relationship to You

It is important that you identify which relationship(s) you have with Ozekon to understand Ozekon’s data protection obligations and your rights to your Personal Information under this Privacy Policy. Ozekon has the following relationships:

- A “User” is an individual providing Personal Information to us via our website or other services, products or platforms, such as by signing up for our newsletter or making an account and posting on the forums. Here, Ozekon is a data controller.
- A “Customer” is a specific type of User that has engaged us to act as an agent (a “data processor”) by obtaining our Services. The Customer is the data controller, and Ozekon is their data processor.
- A “Customer End User” is an individual that provides their Personal Information to our Customers. We do not control the purposes or the means by which their Personal Information is collected, and we are not in a direct relationship with Customer End Users.

Hereinafter we may refer to Customers and Users collectively as “you.”

## 4. Collection

During your use of the Services, Ozekon or third-party vendors contracted by us will collect, use, disclose, store, process, data that identifies you or may make you identifiable (collectively your “Personal Information”).

When you use our Services, we generally collect the following Personal Information about you:

- Your account registration data you provided, including name, email, and/or avatar;
- Your credit card and/or other billing information;
- In-Chat information you provided, such as your name, email address, file attachments, and/or phone number;
- Business information like your company name, company size, and business type;
- Any other information you provide to us, such as, but not limited to, when you add a coworker to join the Services, refer an individual to Ozekon, post on our blog, or submit a resume to apply for a job with us;
- Account information from Add-ons and other third-party services you use in conjunction with our Services;
- Cookies and similar tracking information (see “Cookies” below for more information);
- Data about your use of the Services, such as, but not limited to, interactions with the user interface to the Services, the Internet Protocol Address for the computers you use to connect to the Services with, the frequency and size of data transfers, and information you use to describe yourself; and
- Data required for operation of the Services, such as, but not limited to, information you submit to, publish with, or transfer through to the Services.

## 5. Use & Purpose

We will not use your Personal Information for purposes other than those purposes described in this Policy or disclosed to you. From time to time we may request your permission to allow us to share your Personal Information with third parties. You can choose not to share your information with third parties. When you limit the ways we can use your Personal Information, some or all of the Services may not be available to you.

We use your Personal Information for the following purposes:

- To send you Service-related communications. We send administrative or account-related information to you to keep you updated about our Services, inform you of relevant security issues or updates, or provide other transaction-related information to you. Without such communications, you may not be aware of important developments relating to your account that may affect how you can use our Services.
- For identification, authentication and security. We are committed to providing you with a secure experience on our Services. To do so, we process your Personal Information to enhance security, monitor and verify identity or service access, combat spam or other malware or security risks. Without processing your Personal Information, we may not be able to ensure the security of our Services.
- To enforce terms, agreements or policies. We process your Personal Information to actively monitor, investigate, prevent and mitigate any alleged or actual prohibited, illicit or illegal activities on our Services or violations of our posted user terms. In addition, we may process your Personal Information to enforce our agreements with third parties and partners, and/or collect fees based on your use of our Services. We may use any of your Personal Information collected on our Services for these purposes. We cannot perform our Services in accordance with our terms, agreements or policies without processing your Personal Information for such purposes.

- To provide customer service. When you contact us with questions, feedback, concerns, disputes, or issues, we process your Personal Information so we can respond to you and resolve any issues. If we do not process your Personal Information, we cannot respond to your requests and ensure your continued use of the Services.

Designated Countries: For purposes of the EU General Data Protection Regulation (“GDPR”) or any equivalent legislation (collectively “Applicable Data Protection Laws”), we process this Personal Information based on our contract with you.

- To engage in marketing activities. We may send you marketing communications based on your communication settings to inform you about relevant products and services; to deliver targeted marketing; to provide you with promotional offers; or to inform you about our events, webinars or materials, including those of our partners. We process information about your usage of our Services and your contact information to provide marketing communications. You can opt-out of our marketing communications at any time.

Designated Countries: For purposes of the Applicable Data Protection Laws, we process this Personal Information based on your consent.

- To enhance your experience on the Services. We process your Personal Information to provide you with a personalized experience on our Services, such as allowing you to use our different plugins (integrations) on our Services (e.g., Telegram and Signal) or by keeping track of your preferences (e.g., timezone, display name, etc.). Without such processing, we may not be able to ensure your continued enjoyment of part or all of our Services.

Designated Countries: For purposes of the Applicable Data Protection Laws, we process this Personal Information to satisfy our legitimate interests as described above.

- To conduct research and development. We pride ourselves in being innovative and continuing to offer you new, customized or improved features on our Services. In order to do so, we process your Personal Information to better understand you and the way you use and interact with our Services. Without such processing, we cannot ensure your continued enjoyment of part or all of our Services.

Designated Countries: For purposes of the Applicable Data Protection Laws, we process this Personal Information to satisfy our legitimate interests as described above.

- To maintain legal and regulatory compliance. We process your Personal Information, in collaboration with service providers acting on our behalf, to pay our taxes or fulfill our other business obligations, and/or to manage risk as required under applicable law. We cannot perform the Services in accordance with legal and regulatory requirements without processing your Personal Information for such purposes.

Designated Countries: For purposes of the Applicable Data Protection Laws, we process this Personal Information to comply with our legal obligations and/or to satisfy our legitimate interests.

If you provide us with Personal Information about others, or if others give us your Personal Information, we will only use that Personal Information for the uses described when the Personal Information was provided. Please ensure you have lawful basis to share any third party Personal Information with us.

## 6. Third-party services

We may share or collect your Personal Information in collaboration with our third party service providers (“Partners”), including companies that assist with payment processing, business analytics, data processing, account management, and other services. We instruct these Partners to not use your

Personal Information themselves or share it with another party not under a similar contract to provide service to us, and to only use your Personal Information for the specific services we have requested for us or on your behalf.

#### 7. Further disclosure

We may share with third parties non-Personal Information, public information, and anonymized aggregated data pursuant to this Privacy Policy and as permitted by Data Protection Laws. We may also disclose your Personal Information in the following instances:

- As required by law such as to comply with a subpoena, or similar legal process;
- When we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request;
- If we are involved in a merger, acquisition, or sale of all or a portion of our assets, you will be notified via email and/or a prominent notice within the application of any change in ownership or uses of your Personal Information, as well as any choices you may have regarding your Personal Information; and
- To any other third party with your prior consent to do so.

Designated Countries: For purposes of the Applicable Data Protection Laws, we process this Personal Information, as applicable, to satisfy our legal obligations, protect your vital interests or process data in the public interest, for purposes of our legitimate interests, or with your consent.

#### 8. Personnel

We will only disclose Personal Information to our staff as they need to know and we will ensure such personnel protect Personal Information as required in this Privacy Policy. We do not sell your Personal Information to non-agent third parties.

#### 9. Becoming an example customer

If you would like to be an example customer, write a testimonial, or be highlighted in our newsletter or other communications, please let us know. Otherwise, we will not use you as an example or reference customer in our marketing, communications, or promotional material without your prior consent.

#### 10. Choice/Opt-Out

You may opt-out of receiving communications from us and our partners, remove your information from our database, and choose to not receive future communications unrelated to the Services by cancelling your account.

When you register for the Services we will include you in marketing correspondence from Ozekon, which you can opt-out of at any time by using the 'unsubscribe' option in the email. If you use the Services, we may occasionally contact you with information about special events, sales, activities, promotions, contests, submission opportunities and programs. You always have the option to ask Ozekon not to contact you with this information again.

#### 11. Cookies

When you visit websites on the Internet, your browser may automatically transmit information to the websites you visit throughout every visit. Like many websites, we may use "cookies" to collect information. A cookie is a small data file that we transfer to your computer's hard disk for record-keeping purposes.

Unlike persistent cookies, session cookies are deleted from your computer when you log off from the Services and then close your browser. Third party tools in the Services may also place or read cookies on your browser and we may use Flash cookies (or local shared objects) to store your preferences or use on the Services to personalize your visit. We do not control how third-party cookies are used. You should check the relevant third-party's website for more information about how they use cookies. Both first party and third-party cookies can serve a number of different functions, such as analytics, marketing and advertising.

With your consent, we or our service providers may also use "pixel tags," "web beacons," "clear GIFs," or similar means in connection with the Services and HTML-formatted email messages to, among other things, track the actions of Users and email recipients, to determine the success of marketing campaigns and to compile aggregate statistics about Services usage and response rates. We may also engage one or more third party service providers to serve online advertisements on our behalf. Our service providers may use a "pixel tag" to collect information about your visits to the Services and to other websites, and they may use that information to target advertisements for goods and services. We will not share this information with third parties in a manner that personally identifies you.

Ozekon's embedded chat (and specifically the domains ozekon.io, admin.ozekon.io and chat.ozekon.io) does not collect, retain, or share data regarding a particular Customer End User's activity across multiple websites or applications that are not owned by Ozekon. Ozekon does assign each user a unique user ID within the scope of an individual website, but does not collect or retain IP or any information except information users volunteer (for example, an email or credit card number) which would allow Ozekon to identify the same particular user on more than one website. For the purposes of abuse and fraud prevention, Ozekon may use Customer End User IP during a chat session to block fraudulent IPs, trolls, and prevent other abuse.

We may use the following types of cookies and tracking technologies:

- **Strictly Necessary Cookies.** These cookies are essential because they enable you to move around our Services and use certain features on our Services. For example, strictly necessary cookies allow you to access secure areas. Without these cookies, some Services cannot be provided.
- **Performance/Analytics Cookies.** These cookies collect information about your use and interaction with our Services. The types of information collected by such cookies include which pages you go to most often, how much time you spend on that page, or if you get error messages from certain pages.
- **Functionality Cookies.** These cookies allow us to remember your preferences and choices so that we can tailor our Services to you and your interests. For example, these cookies will remember which country or language you selected, or will use your display name on parts of the Services.

If you are logged in to your account, we may associate the cookie information with the Personal Information tied to your account.

- **Advertising/Marketing Cookies.** These cookies allow us to deliver relevant marketing and advertisements to you. They collect information about your interactions with our marketing activities (e.g., on the website or via emails) to determine what your interests and preferences are, and how effective such advertising or marketing campaigns are.

You can instruct your browser, by changing its options under Settings or Preferences, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. If you do not accept cookies, however, you will not be able to use some or all portions or functionalities of the Services.

We do not control interest-based advertising cookies on our Services. If you would like more information about such cookies or to opt out of having your cookie information used by companies that are part of the Network Advertising Initiative, please visit [www.networkadvertising.org/choices](http://www.networkadvertising.org/choices).

#### 12. Do not track signals

You may have implemented a “do not track” signal through your browser. As there currently is no fixed standard for do not track signals, we currently do not respond to do not track signals from your web browser.

#### 13. Accountability

We will take all appropriate legal, organizational, and technical measures to protect the Personal Information, keeping in mind the nature of such data. Ozekon shall hold those of its employees with access to Personal Information accountable for violations of this agreement imposing sanctions, which include, where appropriate, the possibility of termination of contracts and employment.

#### 14. Security

The security of your Personal Information is important to us. We maintain, and require our service providers to maintain, appropriate physical, technical and administrative safeguards to protect the security and confidentiality of the Personal Information you provide to us.

However, even the best security measures are not foolproof and we cannot guarantee that loss, misuse, unauthorized acquisition, or alteration of your data will not occur. We cannot ensure or warrant the security or confidentiality of the Personal Information you transmit to or receive from us by Internet or wireless connection, including email, phone, or SMS because we have no way of protecting Personal Information that is out of our control.

You are also responsible for the security of your Personal Information. You should choose a password of sufficient length and complexity when you use our Services, and keep your password confidential.

#### 15. Retention

We will retain your Personal Information for so long as we have a legal basis to do so.

#### 16. Requests to Access, Edit, or Delete Information

You may edit your account information when logged in to the Services at any time – all you need is your username and password. In addition, you may also ask Ozekon to correct, delete, and/or cease processing your Personal Information from further processing and/or use. It may not be possible for us to delete or cease processing all of the Personal Information we hold about you where we have an ongoing relationship with you or where we have a legal basis to retain such Personal Information.