

# Privacy Policy

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## 1. Purpose and scope

- 1.1. We respect your privacy and data protection rights and recognize the importance of protecting the personal data ("**Personal Data**") we collect and process. This Privacy Policy ("**Policy**") is designed to help you to understand what personal data we collect about you and how we use and share it. It also describes how you can access and update this information.
- 1.2. This Policy is an agreement between you ("**User**") and this Website operator ("**Operator**", "**we**", "**us**" or "**our**").
- 1.3. This Privacy Policy applies to you if you:
- interact with our websites or our social media pages (collectively, the "**Sites**", "**Website**", and "**Services**") ("**website users**");
  - use our communication and messaging products, customer workspaces, mobile applications, and our other applications and services (collectively, the "**Services**") ("**customers**");
  - interact with any of our end user messenger domains ("**end-users**");
  - are a marketing prospect, who is anyone whose data we processes for the purposes of assessing customer eligibility ("**marketing prospect**"); or
  - receive marketing communications from us.
- 1.4. For the purposes of the General Data Protection Regulation we are the controller of your Personal Data. Our Data Protection Officer can be contacted in writing at [florence@impala.run](mailto:florence@impala.run).

## 2. Personal Data collected

- 2.1. The Personal Data that we collect about you broadly falls into the categories set out in the following table. This table also describes the legal bases on which we collect your Personal Data, how we get it and what we do with it. Some of this information you provide voluntarily when you interact with us. Other types of information may be collected automatically from your device, such as device data and service data. From time to time, we may also receive personal data about you from third party sources (as further described in the table).

| Type of Personal Data   | How we get it  | What we do with it  | Legal basis   |
|---|--|---|---|
| <b>Contact details</b> <ul style="list-style-type: none"><li>● First and Last name</li><li>● Email address</li><li>● Phone number</li></ul>   | From you when you sign-up for the use of our platform or our newsletter.   | <ul style="list-style-type: none"><li>● Communicate with you</li><li>● Provide customer support</li><li>● Sending marketing information</li></ul>   | <ul style="list-style-type: none"><li>● Consent</li></ul> |
| Device data <ul style="list-style-type: none"><li>● OS: version &amp; type</li><li>● Browser</li><li>● IP Address</li><li>● Unique device Identifiers</li><li>● Geo-location</li></ul> Service data <ul style="list-style-type: none"><li>● Pages viewed</li><li>● Links clicked</li><li>● Interaction with our website</li></ul> | Depending on how you choose to configure our cookie preference tool, we may collect this info automatically via other online services. | <ul style="list-style-type: none"><li>● Analyze how our website is used so we can improve your experience</li><li>● Complete orders and remember your settings</li><li>● Identifying language preferences</li><li>● Evaluate the success of our Marketing campaigns</li><li>● Feature testing (A/B test)</li><li>● Tag management</li></ul> | <ul style="list-style-type: none"><li>● Consent</li></ul> |

- 2.2. Some device data, service data and third-party source data is collected through the use of first- or third-party cookies and similar technologies. We assign each user a unique user ID within the scope of an individual website, but do not collect or retain IP or any information that would allow us to identify the same particular user on more than one website. For more information, please see our Cookie Policy.

Do Not Track. Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" or similar signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

### 3. How and why we use your personal data

- 3.1. We collect and process your personal data for the following purposes and, if you are from the European Economic Area ("EEA"), the UK or Switzerland, on the following legal bases:

- Providing and facilitating delivery of our Sites: We process your personal data to perform our contract with you for use of our Services and Sites and to fulfill our obligations under applicable terms of service. Where we have not entered into a contract with you, we process your personal data in reliance on our legitimate interests to operate and administer our Sites. For example, to create, administer and manage your account.
- Communicating with you about our Sites and providing customer support: We may send you service, technical and other administrative messages in reliance on our legitimate interests in administering our Sites. For example, we may send you messages about the availability or security of our Sites. We also process your personal data to respond to your comments and questions and to provide customer care and support.
- Improving our Sites: We process your personal data to improve and optimize our Sites and to understand how you use them, including to monitor usage or traffic patterns and to analyze trends and develop new products, services, features and functionality in reliance on our legitimate interests.
- Sending marketing communications: We process your personal data to send you marketing communications via email, post, push, Whatsapp or SMS about our products and services that might interest you in reliance on our legitimate interests or where we seek your consent. Please see the "Your Privacy Rights and Choices" section below to learn how you can control your marketing preferences.
- Maintaining security of our Sites: We process your personal data to control unauthorized use or abuse of our Sites, or otherwise detect, investigate or prevent activities that may violate our policies or applicable laws, in reliance on our legitimate interests to maintain and promote the safety and security of our Sites.
- Displaying personalized advertisements: We process your personal data to advertise to you and to provide personalized information, including by serving and managing advertisements on our Sites and on third party sites, in reliance on our legitimate interests to support our marketing activities and advertise our products and services or,

where necessary, to the extent you have provided your consent.

- Carrying out other legitimate business purposes: Including invoicing, audits, fraud monitoring and prevention.
- Complying with legal obligations: We process your personal data when cooperating or complying with public and government authorities, courts or regulators in accordance with our obligations under applicable laws and to protect against imminent harm to our rights, property or safety, or that of our users or the public, as required or permitted by law.

3.2. In certain circumstances, we may collect your personal data on a different legal basis. If we do, or if we use your personal data for purposes that are not compatible with, or are materially different than, the purposes described in this notice or the point of collection, we will explain how and why we use your personal data in a supplementary notice at or before the point of collection. Where we refer to legal bases in this section, we mean the legal grounds on which organizations can rely when processing personal data.

3.3. Please note these legal bases only apply to you if you are resident in the EEA, the UK or Switzerland.

3.4. If you have any questions about our legal bases for processing your personal data, please contact us at [florence@impala.run](mailto:florence@impala.run).

#### 4. Sharing your Personal Data

4.1. We may disclose some or all of the personal data we collect to the following third parties:

Group Companies:

Any group companies may be added to this list from time to time.

Service Providers:

- Consultants and vendors engaged by us to support our provision of our Sites
- Any such other Service Providers as may be added to the Sub-processor list (contact [florence@impala.run](mailto:florence@impala.run)).

Advertising Partners:

Third party advertising companies may use cookies and similar technologies to collect information about your activity on our Sites and other online services over time to serve you online targeted advertisements, including the companies listed to the Sub-processor list (contact [florence@impala.run](mailto:florence@impala.run)).

Professional Advisors:

Professional advisors, such as lawyers, auditors and insurers, in the course of the professional services that they render to us.

Compliance with Law Enforcement:

- Comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities;
- Protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);

- Enforce the terms and conditions that govern the Sites; and
- Prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

**Business Transfers:**

Parties to transactions or potential transactions (and their professional advisors) involving a corporate divestiture, merger, consolidation, acquisition, reorganization, sale or other disposition of all or any portion of the business, assets, or equity interests of our Group Companies (including, as part of a bankruptcy or similar proceeding).

- 4.2. **Aggregated or anonymized information.** We may also share aggregated or anonymized information with third parties for other purposes. Such information does not identify you individually, but may include usage, viewing and technical information such as the websites you generally use, the configuration of your computer, and performance metrics related to the use of websites which we collect through our technology, products and services. If we are required under applicable law to treat such information as personal data, then we will only disclose it as described above. Otherwise, we may disclose such information for any reason.
- 4.3. **Third party websites.** Our Sites may also contain links to third party websites. This Privacy Policy applies solely to information processed by us. You should contact the relevant third-party websites for more information about how your personal data is processed by them.

## 5. Retention of your Personal Data

- 5.1. We retain your personal data only for as long as necessary to fulfill the purposes set out in this Privacy Policy. If you would like more information about specific retention periods, please contact [florence@impala.run](mailto:florence@impala.run).
- 5.2. Note that content you post may remain on our Sites even if you cease using our Sites or we terminate access to the Sites.

## 6. Transfers of your Personal Data

- 6.1. Our Sites uses hosting providers that have different data centers around the world, including in the EEA and in the United States. Due to the use of hosting providers, we may transfer, and process, your personal data outside of the country in which you are resident. These countries may not have equivalent privacy and data protection laws (and, in some cases, may not be as protective). We will protect your personal data in accordance with this Privacy Policy wherever it is processed.
- 6.2. Certain recipients (our service providers and other companies) who process your personal data on our behalf may also transfer personal data outside the country in which you are resident. Where such transfers occur, we will make sure that an appropriate transfer agreement is put in place to protect your personal data.
- 6.3. If you are a resident of the EEA, the UK or Switzerland, we will protect your personal data when it is transferred outside of the EEA, the UK or Switzerland by processing it in a territory which the European Commission has determined provides an adequate level of protection for personal data; or otherwise ensuring appropriate safeguards are in place to protect your personal data.
- 6.4. Following the invalidation of the Privacy Shield for transfers of your personal data to recipients

who are located outside of the EEA, the UK or Switzerland, we will rely on the Standard Contractual Clauses approved by the European Commission.

6.5. If you would like to find out more about international transfers, please contact our Data Protection Officer at [florence@impala.run](mailto:florence@impala.run).

## 7. How we store and safeguard your Personal Data

7.1. We care about protecting Personal Data. That is why we put in place, in accordance with our Information Security Policy, technical and organization appropriate measures that are designed to secure your Personal Data. Some of our Services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored. If and when possible, we always choose to have the Personal Data stored on servers located in data centers in the EEA. Given the nature of communications and information processing technology, we cannot guarantee that the Personal Data during transmission through the Internet or while stored on our systems or otherwise in our care will be absolutely safe from intrusion by others. If you have any questions about the security of your data, please contact our security team at [florence@impala.run](mailto:florence@impala.run).

## 8. Your privacy rights and choices

8.1. If you are a resident of the EEA or the UK, you have the following data protection rights:

- If you wish to access, correct, update or request deletion of your Personal Data, you can do so at any time.
- You can object to processing of your Personal Data, ask us to restrict processing of your Personal Data or request portability of your Personal Data.
- You have the right to opt-out of marketing communications we send you at any time. If you no longer wish to receive our newsletter and promotional communications, you may opt-out of receiving them by clicking on the "unsubscribe" or "opt-out" link in the communications we send you. Please note, however, that it may not be possible to opt-out of certain service-related communications. You can let us know at any time if you do not wish to receive marketing messages by contacting us using the contact details below.
- Similarly, if we have collected and process your Personal Data with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. Contact details for data protection authorities in the EEA and the UK are available [here](#).

8.2. You can exercise any of these rights by submitting a request to our Data Protection Officer at [florence@impala.run](mailto:florence@impala.run). In order to protect your privacy we will ask you to provide proof of your identity to us. We will respond within a maximum of 30 days to query.

## 9. Cookies

9.1. The Website and Services use "cookies" to help personalize your online experience. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you and

can only be read by a web server in the domain that issued the cookie to you.

- 9.2. We may use cookies to collect, store, and track information for statistical purposes to operate the Website and Services. You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the features of the Website and Services. To learn more about cookies and how to manage them, visit [internetcookies.org](https://internetcookies.org). To learn more about our Cookie Policy visit the Cookie Policy in the footer of our homepage.

## **10. Data breach**

- 10.1. In the event we become aware that the security of the Website and Services has been compromised or users Personal Data has been disclosed to unrelated third parties as a result of external activity, including, but not limited to, security attacks or fraud, we reserve the right to take reasonably appropriate measures, including, but not limited to, investigation and reporting, as well as notification to and cooperation with law enforcement authorities. In the event of a data breach, we will make reasonable efforts to notify affected individuals if we believe that there is a reasonable risk of harm to the user as a result of the breach or if notice is otherwise required by law. When we do, we will post a notice on the Website.

## **11. Children's Privacy**

- 11.1. Our Sites are not intended for use by anyone under the age of 16. We do not knowingly collect Personal Data from anyone under the age of 16. If you are under 16, you may not attempt to register for our Services or send any information about yourself to us, including your name, address, telephone number, or email address. If we become aware that we have collected Personal Data from someone under the age of 16 without verification of parental consent, we will delete that information promptly. If you are a parent or legal guardian of a child under 16 and believe that a child has provided us with their personal information, please contact us at the email or mailing address provided at the end of this Privacy Policy.

## **12. Changes to his notice and questions**

- 12.1. We may amend this Privacy Policy from time to time in response to changing legal, technical or business developments. When we update it, we will take appropriate measures to inform you, consistent with the significance of the changes we make. If we make material updates to this Privacy Policy, we will update the effective date at the top of the Privacy Policy.
- 12.2. If you have any questions, comments or concerns about the way your Personal Data is being used or processed by us, please submit any questions, comments or concerns in writing to request to our Data Protection Officer at [florence@impala.run](mailto:florence@impala.run).

## **13. Contacting us**

- 13.1. If you would like to contact us to understand more about this Policy or wish to contact us concerning any matter relating to individual rights and your Personal Data, you may send an email to [florence@impala.run](mailto:florence@impala.run).

This document was last updated on 03.02.2023.