OWOX Privacy Policy

This Privacy Policy is effective from 12 September 2023. The Archived versions of the Privacy Policy can be found below.

This Privacy Policy completely replaces the previous version.

OWOX is committed to protecting your safety and privacy, and takes its responsibilities regarding the security of information very seriously.

This privacy policy explains what data OWOX collects about you, how and why OWOX uses it, who OWOX discloses it to, and how OWOX protects your privacy.

If you do not agree to this Privacy policy, please do not use our website and our services.

1. Who is collecting and/or processing your data?

OWOX, Inc., a company established under the laws of California, United States of America, with registration number C3725260, (referred to as “OWOX”, “we”, “us”, “our” in this Privacy Policy) is a company that collects and/or processes your data.

Data controller. OWOX collects some personal data from you, for example when you use OWOX website, provide feedback on OWOX services or contact OWOX. In this case, OWOX is the data controller for purposes of European data protection legislation and OWOX takes on the obligations and responsibilities of data controllers, particularly described in General Data Protection Regulation.

Data processor. You may decide to transfer OWOX with your clients’ personal data by using our services. In this case, you are the data controller and OWOX stands out as the data processor for purposes of European data protection legislation. You are solely responsible for the accuracy of clients' personal data and obtaining the legal grounds for their processing. You shall inform your clients about the use of data processors to process their personal data and that their personal data may be processed outside of the European Economic Area.

2. What personal data does OWOX collect and process?

The term “personal data” in this Privacy Policy is the information that relates to you and allows OWOX to identify you, either directly or in combination with other information that OWOX may hold. Your personal data may include for example your name, your contact details (email, telephone number), your payment details or information on how you use our website.

The personal data you provide us with is only processed and used in a manner adequate for the purpose for which it was collected. OWOX does not combine personal data that was obtained for a variety of purposes.

When providing personal data through OWOX website, you consent to the OWOX usage of provided data in accordance with this Privacy Policy and/or any additional agreement between you and OWOX.

OWOX may collect and process the following categories of information about you:

1. Your contact details (name, surname, telephone number, email, company name, company website):
   1.1. When you log in or create an account or project in OWOX services

1.2. When you choose an offer OWOX makes available on its website
1.3. When you request an OWOX services demonstration or trial
1.4. When you subscribe to OWOX newsletters
1.5. When you register for OWOX webinars
1.6. When you send a request for OWOX technical support
1.7. When you send a request for third-party services information (e.g. Google Analytics 360)

2. Your payment details (credit card number, expiry date, etc.) —
When you purchase OWOX products or services
When you validate your payment details
3. Your IP, cookies
When you visit our website
When you use our services
4. The communications you exchange with OWOX (for example, your emails, letters, calls, or your messages on OWOX online chat service) — When you contact OWOX or you are contacted by OWOX messages on our online chat service)
5. Your posts and messages on social media directed to OWOX — When you interact with OWOX on social media
6. Your feedback — When you reply to our requests for feedback or participate in our surveys
7. Information about how you use our website — When you navigate on our website
8. Aggregated data statistics (for personalization of user experience in services) — When you provide your access to Google Analytics account

By using our services, you may be providing us with your clients' personal data. You should therefore ensure that you have collected your clients' respective consents and approval in order to process their data in accordance with applicable data protection law. We shall be entitled to: obtain, collect, distribute, record, organise, adapt or alter, retrieve, consult, align, combine, transfer, use, store, block, destroy, and conduct the international transfer (including countries that do not ensure adequate level of protection of personal data) of the personal data you provide us with. Your clients' personal data belongs to you and OWOX will follow your instructions in regard to your client's personal data. It will be stored in Google BigQuery tables and at your Google Cloud Platform project.

We do not knowingly collect personal data from children under 16 without the consent of parents or legal guardians. You must be of the age of majority in your jurisdiction to use our website or services. If you are under the age of 16, you may only use our website with the permission of your parents or legal guardian.

We do not knowingly collect personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and genetic data, or biometric data data concerning health or data concerning a natural person's sex life or sexual orientation.

2. Rights of data subjects

You have certain legal rights to access certain personal data we hold about you and to obtain its correction, amendment, portability or deletion.

You may exercise those rights in your account, in the “Settings” chapter, or by contacting us via data-protection@owox.com. We will respond to your request at the soonest, but in any case within 30 calendar days from the date we receive your request.

According to the California Consumer Protection Act, consumers from California have the following rights:

- Right to request from OWOX:
  (1) The categories of personal data that OWOX has collected about you,
  (2) Categories of sources from which personal data are collected,
  (3) Business or commercial purpose for the collection or sale of personal data,
  (4) Categories of third parties to whom OWOX provides personal data,
  (5) Categories of your personal data that has been sold, and categories of third parties to whom personal data has been sold,
  (6) The specific personal data that OWOX has collected about you,
  You can exercise this right by using the method described above.
- The right to non-discrimination in the event you exercise your rights under the California Consumer Privacy Act.

4. How and why OWOX uses your data?

We use your personal data for the following purposes:

4.1. To provide our services to you and technical support

OWOX uses your information to perform OWOX services in relation to your project. For example, to automatically import data into your Google Analytics account, collect Google Analytics unsampled data in your Google BigQuery project, store frequently used queries for Google BigQuery, make transactions, or provide technical assistance.

4.2. To communicate with you and manage our relationship with you

When you provide your details to submit the request for information on our website, download any material or presentation from our website, request a demo of our services, register for webinar, start a trial or services usage, contact us on social media, or in any other way express your interest in our services and products, we will communicate with you to respond on your request and subscribe you to our newsletter. You may unsubscribe from us or request to stop any communication with you by clicking the "unsubscribe" link on our email or by replying "unsubscribe" for any emails from our sales or marketing team (if "unsubscribe" link is unavailable). We will honor your request.

Occasionally we may need to contact you by email and/or telephone for administrative or operational reasons, for example in order to send you the confirmation regarding webinar registration, the reply to your request for technical assistance, to remind you about trial expiry date or pending invoices.

Please be aware that these communications are not made for marketing purposes and as such, you will continue to receive them even if you opt-out from receiving marketing communications.

4.3. To personalize and improve your customer experience

OWOX may use your personal data in order to tailor our services to your needs and preferences and to provide you with a personalised customer experience.

OWOX may also collect information on how you use our website, which pages of our website you visit most, and what products you buy, in order to understand what you like. OWOX may use this information to tailor the content and offers that you see on our website and, if you have agreed to receive marketing communications, to send you relevant messages that we think you like.

4.4. To inform you about our news and offers that you may like

OWOX may send you marketing communications if you have indicated your interest in our product and services: submitted the request for information on our website, downloaded any material or presentation from our website, requested a demo of our services, registered for webinar, started a trial or services usage, contacted us on social media, or in any other way expressed your interest in our services and products..

Please note that OWOX does not share your contact details and other personal data with other companies for marketing purposes, unless OWOX has obtained your consent to do so.

If you do not want to receive marketing communications from us, you can at any time opt out from receiving marketing communications by updating your account settings or by clicking on the relevant "unsubscribe" link at the bottom of any email you received from us, or by replying "unsubscribe" for any emails from our sales or marketing team (if "unsubscribe" link is unavailable).

4.5. To improve our services, fulfil our administrative purposes and protect our business interests and for marketing purposes

The business purposes for which OWOX will use your information include lead's evaluation, marketing among leads and customers, accounting, billing and audit, credit or other payment card verification, fraud screening, safety, security and legal purposes, systems testing, maintenance and development.

OWOX may use anonymous data, which will not include personally identifiable information or information that identifies or would reasonably be expected to identify you, to collect the OWOX service statistics and to improve and enhance the OWOX services (the data is collected in anonymized form, e.g. in the form of derived metrics and coefficients).

4.6. To showcase the results of using OWOX services or your feedback, only upon prior agreement with you and to the agreed extent

4.7. To comply with our legal obligations and compliance reasons, such as the prevention, detection, or investigation of a crime; loss prevention; or fraud.

OWOX may also use personal information to meet its internal and external audit requirements, information security purposes, and as OWOX otherwise believe to be necessary or appropriate: (a) under applicable law, which may include laws outside your country of residence; (b) to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence; (c) to enforce our terms and conditions; and (d) to protect our rights, privacy, safety, or property, or those of other persons, court order, law or governmental request.

We use your personal data based on:

your consent,

an agreement concluded with you, or to take action at your request before concluding an agreement,

compliance with our legal obligations,

based on our legitimate interests, for example, when we use cookies on our website or when we receive your data from advertising campaigns, from open public sources or as a result of communications with you.

5. Security of your data

We are committed to taking appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage to personal data.

Your personal information is stored behind secured networks and is only accessible by a limited number of people who have special access rights to such systems, and are required to keep the information confidential. In addition, all information you supply is encrypted using Secure Socket Layer (SSL).

Our services use official APIs from Google, Bing, Facebook and others, where it is technically applicable to access the data that you provide.

To provide access to Google services, we use OAuth authentication. This is an open authorization protocol, which provides us with limited access to protected resources for our services without passing your data for authorization in your account.

You can limit access to your data in your Google account settings at any time.

We will protect your data in the following ways:

using cryptography, where necessary;

using password, where necessary; and

restricting access to your data (i.e. access to your personal data is granted only to those of our employees or contractors for whom the access is necessary).

6. International transfer of data

6.1. As described in this Privacy Policy, OWOX may in some instances disclose your personal data to third parties. Where OWOX discloses your personal data to a third party, we require that the third party has appropriate technical and organisational measures in place to protect your personal data.

6.2. The information that you provide to us will be held in our systems, which are located on our premises or those of an appointed third party.

6.3. We and some of our subprocessors are based outside the EEA. That is why your personal data may be accessed by and processed outside the European Economic Area, Switzerland and/or the United Kingdom.

6.4. When we act as data controller, the transfer of personal data outside the EEA, Switzerland and/or the United Kingdom is based on this Privacy Policy. In this case, we check if there is a European authorities decision that the third country, a territory or one or more specified sectors within that third country, or the international organisation in question ensures an adequate level of protection, and/or in the absence of this decision we will rely on one or more of the appropriate safeguards, referred to in Article 46 of the GDPR.

6.5. Limitation of Liability. Notwithstanding anything to the contrary, will either party of this Privacy Policy, their affiliates, officers, directors, employees, agents, service providers,

suppliers or licensors be liable to the other party or any third party for any lost profits, lost sales, lost data (being data lost in the course of transmission via Your system or over the internet through no fault of OWOX), loss of goodwill, or for any type of indirect, incidental loss or damages, incurred by the other party in connection with this Privacy Policy. For the avoidance of doubt, this provision shall not be construed as limiting the liability of either party with respect to claims brought by data subjects.

7. Term for data storage

OWOX will not store your personal data for longer than is necessary for the purpose for which it was provided or collected. OWOX will only retain the personal data that serves a legitimate purpose (e.g. applicable legal regulations may require the retention of data, or some data may be necessary for the purposes of billing outstanding amounts).

After 2 years from the moment of your last visit to OWOX website, your account and your unsubscription from OWOX newsletters, OWOX at its sole discretion delete your personal data or anonymize it.

OWOX will also delete your personal data within 30 calendar days of receiving your request for data erasure.

OWOX reserves its right to retain a part of personal data, which is required by applicable law and for the term, required by applicable law (e.g. applicable law may require that some personal data shall be retained for tax accounting or for issues of the invoice for unpaid fees).

8. Sharing your personal data

OWOX uses a limited number of third-party providers to assist us in providing the services to our customers. Third parties may access, process or store personal data in the framework and upon our instructions only. OWOX may share your information with the following persons:

Affiliates. OWOX may disclose your information to its affiliates or subsidiaries, which may use your information to provide services to you or to communicate with you regarding services provision on OWOX behalf.

*Service Providers***.** OWOX may disclose the information it collects from you to third-party vendors, service providers, contractors or agents who perform functions on OWOX behalf.

Other Third Parties. OWOX may disclose your information to third parties upon your instructions to do so. For example, when you ask OWOX to transfer the data from your CRM to your Google BigQuery project.

Credit and debit card companies. OWOX may disclose your payment details strictly to the companies that process the card payments for the purposes of processing of payment for OWOX services.

Business Transfers. If OWOX is acquired by or merged with another company, if substantially all of OWOX assets are transferred to another company, or as part of a bankruptcy proceeding, OWOX may transfer the information it has collected from you to this company.

9. Cookies or other tracking technologies

In order to improve our services, to provide you with more relevant content and to analyse how visitors use our website, or for direct marketing purposes, we may use technologies, such as

cookies, local storage and pixels. Please be aware that in most cases we will not be able to identify you from the information we collect using these technologies.

For example, we use software to monitor customer traffic patterns and website usage to help us develop the design and layout of the website in order to enhance the experience of the visitors to our website. In addition, in order to understand how our customers interact with the emails and the content that we send, we use pixels that allow us to know if the emails we send are opened.

We use cookies and local storage on our website. These technologies are small pieces of information stored by your browser on your computer's hard drive. On your further visits to that website, the information stored in the cookie is sent back to the website. This allows the website to recognise you and tailor its content to your needs.

What cookies does OWOX use?

We use the following types of cookies:

(i) essential cookies, which are essential for the provision of access to our websites and Services;

(ii) functionality cookies, which are used to personalize the content in accordance with your actions on our website;

(iii) performance cookies, which do not identify you individually (until you enter your identification details in any of our forms) but help us to evaluate the website performance and its statistics; and

(iv) targeting/advertising cookies, which help advertise OWOX offers and services on the other sites.

We also use analytics and similar services that collect third-party cookies.

How to reject or delete cookies?

Most web browsers automatically accept cookies. However, you do not have to accept cookies and you can, should you choose to at any time, reject or block the use of cookies and delete all cookies currently stored on your device. You can find out how to do this for your particular browser by clicking “help” on your browser’s menu, or by visiting: www.allaboutcookies.org, http://www.youronlinechoices.com/uk/your-ad-choices, http://optout.networkadvertising.org/.

However, if you turn off cookies, the functionality of our Services may be limited (i.e. in the case of essential cookies you may not be able to access our websites, your account and services).

10. Links

OWOX websites may contain links to other websites, which are owned and operated independently of OWOX. Therefore, any information you provide to those websites will be governed by their own privacy policy principles and data collection practices. OWOX assumes no responsibility or liability for information handling procedures and/or policies of such independent websites.

11. Revisions

OWOX may make changes to this Privacy Policy from time to time, without advance notice and any modifications are effective when they are posted at our website.

OWOX may make changes to this Privacy Policy including as part of the changes in applicable data protection legislation and/or rules of certifications in the programs, in which OWOX participates or starts to participate.

12. Data Protection Framework program notice

OWOX complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. OWOX has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. OWOX has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit https://www.dataprivacyframework.gov/.

12.1. Questions or Complaints In compliance with the EU-U.S. DPF, and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, OWOX commits to resolve DPF Principles-related complaints about our collection and use of your personal information. EU, and UK, and Swiss individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-U.S. DPF, and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF should first contact our Data Protection Officer (Maksym Voloshyn) at: data-protection@owox.com or at our mailing address.

We will respond to you to resolve your issue as soon as possible but in any event within 30 days from receiving your inquiry.

12.2 Dispute Resolution In compliance with the EU-U.S. DPF, and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, OWOX commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs), and the UK Information Commissioner's Office (ICO) and the Gibraltar Regulatory Authority (GRA), and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF, and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF.

12.3. U.S. Federal Trade Commission Enforcement The Federal Trade Commission has jurisdiction over OWOX's compliance with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF).

12.4. Arbitration You may also be able under certain conditions to invoke binding arbitration for unresolved complaints regarding DPF compliance not resolved by any of the other DPF mechanisms. Please follow Annex I for additional information: https://www.dataprivacyframework.gov/s/article/ANNEX-I-introduction-dpf?tabset-35584=2.

12.5. Onward transfers to third parties If OWOX transfers personal information to a third party acting as an agent on its behalf, OWOX shall remain liable under the DPF Principles if its agent processes such personal information in a manner inconsistent with the DPF Principles, unless OWOX proves that it is not responsible for the event giving rise to the damage.

EU, UK, and Swiss individuals have the opportunity to choose (i.e., opt-out) whether their personal information is (i) to be disclosed to a third party or (ii) to be used for a purpose that is materially different from the purpose(s) for which it was originally collected or subsequently authorized by them, by using the following mechanisms (at their own choice):

- ➢ fill out the form, provided at www.owox.com/policies/control-your-data/;
- ➢ fill out the form in the OWOX BI Project;
- ➢ write an email to data-protection@owox.com.

13. Contact information

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to data-protection@owox.com.

You may also send your request to our data protection officer – Maksym Voloshyn, email: data-protection@owox.com.

For EU and EEA citizens — you may also contact our EU Data Representative: OWOX limited, Boumpoulinas 11, 1st floor, 1060 Nicosia Cyprus.

Statement for the performance of the California Consumer Protection Act:

Based on Article 1278.130 California Consumer Protection Act we inform you of the following actions, performed in the past 12 months:

1. OWOX collected the following categories of personal data: personal data, listed in paragraph 2 of OWOX Inc. Privacy Policy,
2. OWOX did not sell personal data to third parties,
3. OWOX disclosed for business purposes to its contractors and processors: personal data, listed in paragraph 2 of OWOX Inc. Privacy Policy.