



# Privacy Policy

## Document Management Table

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## 1) Introduction

This privacy policy (“Privacy Policy”) governs how we, EverCompliant Ltd., and any other member of the EverCompliant group (together, “EverCompliant”, “we”, “our” or “us”) use, collect and store Personal Data we collect or receive from or about you (“User”, or “you”) such as in the following use cases:

- (i) When you browse or visit our website, <http://evercompliant.com/> (“Website”);
- (ii) When you make use of, or interact with, our Website
  - a. When you click on “Free Trial”
  - b. When you subscribe, create an account and make use of the eKYC Inspector
  - c. When you download Success Stories, Whitepapers & Brochures
  - d. When you want to become a partner
  - e. When we process your job application
  - f. When you subscribe to the email list / blog or leave a comment on our blog
  - g. When you contact us (e.g. customer support, when you submit an inquiry, or leave us a message)
- (iii) When you attend a marketing event and provide Personal Data
- (iv) When you exchange business cards with us
- (v) When we acquire your Personal Data from third-party sources
- (vi) When we use the Personal Data of our customers
- (vii) When we use the Personal Data of our suppliers
- (viii) When you interact with us on our social media profiles  
(e.g., Facebook, Twitter, LinkedIn)

We greatly respect your privacy, which is why we make every effort to provide a platform that would live up to the highest of user privacy standards. Please read this Privacy Policy carefully, so you can fully understand our practices in relation to Personal Data. “Personal Data” means any information that can be used, alone or together with other data, to uniquely identify any living human being. Please note that this is a master privacy policy and some of its provisions only apply to individuals in certain jurisdictions. For example, the legal basis in the table below is only relevant for GDPR-protected individuals.

This Privacy Policy may be updated from time to time and therefore we ask you to check back periodically for the latest version of the Privacy Policy, as indicated below. If there will be any significant changes made to the use of your Personal Data in a manner different from that stated at the time of collection, we will notify you by posting a notice on our Website or by other means.

## 2) What Information We Collect, Why We Collect it, and How it is Used

Data we collect	Why is the data collected and for what purposes?	Legal basis (GDPR only)	Third parties with whom we share your data	Consequences of not providing the data
<b>When you browse or visit our website</b>				
Cookies, Analytic Tools and/or Log Files  For more information, please read our cookies policy <a href="https://evercompliant.com/wp-content/uploads/2019/05/Evercompliant-Cookies-Policy9002063.2.pdf">https://evercompliant.com/wp-content/uploads/2019/05/Evercompliant-Cookies-Policy9002063.2.pdf</a>	Marketing, analytics, analysis, market research, to improve our website	Consent  Legitimate interest (e.g. essential cookies)	3rd party platforms such as for the following purposes: <ul style="list-style-type: none"> <li>• Google (Analytics)</li> <li>• Firebase (Analytics)</li> <li>• Facebook Pixels and SDKs (Analytics)</li> <li>• <a href="#">Mixpanel</a> (Analytics)</li> </ul>	Cannot use or access some parts of the website
<b>When you make use of, or interact with our Website</b>				
<b>When you click on "Free Trial"</b>				
<ul style="list-style-type: none"> <li>• First Name</li> <li>• Last Name</li> <li>• Title</li> <li>• Company</li> <li>• Email address</li> <li>• Phone number</li> <li>• Optional - up to five (5) URLs</li> <li>• Any other information that you decide to provide/supply us</li> </ul>	<ul style="list-style-type: none"> <li>• To provide a free trial</li> </ul>	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (e.g. showing you certain products and features that you have shown an interest in).  Legitimate interest (e.g. provide a free trial)	3rd party platforms such as for the following purposes: <ul style="list-style-type: none"> <li>• Google (Analytics)</li> <li>• Firebase (Analytics),</li> <li>• <a href="#">Mixpanel</a> (Analytics)</li> <li>• Facebook Pixels and SDKs (Analytics)</li> <li>• <a href="#">Salesforce</a>(CRM)</li> <li>• <a href="#">Hubspot</a> (Digital marketing platform)</li> <li>• Survey Monkey (Survey platform)</li> <li>• Mailchimp (email tool)</li> <li>• <a href="#">Bitly</a> (Analytic tools)</li> <li>• Amazon web services (Cloud)</li> <li>• Google (Gmail email provider)</li> </ul>	Cannot provide a free trial
<ul style="list-style-type: none"> <li>• First Name</li> <li>• Last Name</li> <li>• Email address</li> </ul>	<ul style="list-style-type: none"> <li>• To send marketing communications</li> </ul>	Consent	3rd party platforms such as for the following purposes: <ul style="list-style-type: none"> <li>• Salesforce (marketing)</li> <li>• AWS (cloud)</li> <li>• Google (Gmail email provider)</li> </ul>	Cannot send marketing communications
<b>When you subscribe, create an account and make use of the eKYC Inspector</b>				
<ul style="list-style-type: none"> <li>• First Name</li> <li>• Last Name</li> <li>• Title</li> <li>• Company</li> <li>• Email address</li> <li>• Phone number</li> <li>• Company URL</li> <li>• Optional - up to four (4) additional company URLs</li> <li>• Payment information</li> <li>• Contract information</li> <li>• Any other information that you decide to provide/supply us</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">To process</a> your eKYC Inspector request</li> <li>• To send you the eKYC Inspector report</li> </ul>	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (e.g. to provide you with the information of the "eKYC Inspector report", per your request).  Legitimate interest (e.g. to send you contract-related communications and/or marketing communications).	3rd party platforms such as for the following purposes: <ul style="list-style-type: none"> <li>• Salesforce (marketing)</li> <li>• AWS (cloud)</li> <li>• Google (Gmail email provider)</li> </ul>	Cannot send you the "eKYC Inspector report".  Cannot send you marketing communications.

Data we collect	Why is the data collected and for what purposes?	Legal basis (GDPR only)	Third parties with whom we share your data	Consequences of not providing the data
<ul style="list-style-type: none"> <li>• First Name</li> <li>• Last Name</li> <li>• Email address</li> <li>• Phone number</li> </ul>	<ul style="list-style-type: none"> <li>• To send marketing communications.</li> </ul> <p><b>Please note</b> that if you have consented, we can call you telemarketing calls. If you want to withdraw <a href="#">consent</a> please <a href="mailto:privacy@evercompliant.com">privacy@evercompliant.com</a></p>	Consent		Cannot send marketing communications
<b>When you download Success Stories, Whitepapers &amp; Brochures</b>				
<ul style="list-style-type: none"> <li>• First Name</li> <li>• Last Name</li> <li>• Title</li> <li>• Company</li> <li>• Email address</li> <li>• Phone number</li> <li>• Any other information that you decide to provide/supply us</li> </ul>	<ul style="list-style-type: none"> <li>• To download our Success Stories, Whitepapers &amp; Brochures</li> </ul>	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (e.g. showing you certain products and features that you have shown an interest in) Legitimate interest (e.g. provide a free trial)	3rd party platforms such as for the following purposes: <ul style="list-style-type: none"> <li>• Google (Analytics)</li> <li>• Firebase (Analytics)</li> <li>• <a href="#">Mixpanel (Analytics)</a></li> <li>• Facebook Pixels and SDKs (Analytics)</li> <li>• <a href="#">Salesforce(CRM)</a></li> <li>• <a href="#">Hubspot</a> (Digital marketing platform)</li> <li>• Survey Monkey (Survey platform)</li> <li>• Mailchimp (email tool)</li> <li>• <a href="#">Bitly</a> (Analytic tools)</li> <li>• Amazon web services (Cloud)</li> <li>• Google (Gmail email provider)</li> </ul>	Cannot provide a free trial
<ul style="list-style-type: none"> <li>• First Name</li> <li>• Last Name</li> <li>• Email address</li> </ul>	<ul style="list-style-type: none"> <li>• To send marketing communications</li> </ul>	Consent		Cannot send marketing communications
<b>When you want to become a partner</b>				
<ul style="list-style-type: none"> <li>• First Name</li> <li>• Last Name</li> <li>• Title</li> <li>• Company</li> <li>• Email address</li> <li>• Phone number</li> <li>• Any other information that you decide to provide/supply us</li> </ul>	<ul style="list-style-type: none"> <li>• To process your application to become a partner</li> <li>• To asses you as a partner</li> </ul>	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract  Legitimate interest (e.g. to assess you as a partner)	3rd party platforms such as for the following purposes: <ul style="list-style-type: none"> <li>• AWS (cloud)</li> <li>• Google (Gmail email provider)</li> </ul>	Cannot process your application to become a partner  Cannot assess you as a partner
<b>When we process your job application</b>				
<ul style="list-style-type: none"> <li>• First Name</li> <li>• Last Name</li> <li>• Profession</li> <li>• Email address</li> <li>• Phone number</li> <li>• CV</li> <li>• LinkedIn profile</li> <li>• Any other information that you decide to provide/supply us</li> </ul>	<ul style="list-style-type: none"> <li>• To process your application</li> <li>• To asses you as a candidate</li> </ul>	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract  Legitimate interest (e.g. to assess you as a candidate)	3rd party platforms such as for the following purposes: <ul style="list-style-type: none"> <li>• Lever (Recruitment tool)</li> <li>• Google (Gmail email provider)</li> </ul>	Cannot process your application  Cannot assess you as a candidate
<b>When you subscribe to the email list / blog or leave a comment on our blog</b>				

Data we collect	Why is the data collected and for what purposes?	Legal basis (GDPR only)	Third parties with whom we share your data	Consequences of not providing the data
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Blog comments</li> </ul> <p>Any other information that you decide to provide/supply us</p>	<ul style="list-style-type: none"> <li>• To add you to our mailing list</li> <li>• To send marketing communications</li> </ul>	<p>Consent</p> <p>Legitimate interest (e.g. send you more information about <a href="#">EverCompliant</a>)</p>	<p>3rd party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> <li>• Google (Analytics)</li> <li>• Firebase (Analytics)</li> <li>• <a href="#">Mixpanel</a> (Analytics)</li> <li>• Facebook Pixels and SDKs (Analytics)</li> <li>• Salesforce (CRM)</li> <li>• <a href="#">Hubspot</a> (Digital Marketing platform)</li> <li>• Survey <a href="#">Monkey</a> (Survey platform)</li> <li>• Mailchimp (email tool)</li> <li>• <a href="#">Bitly</a> (Analytic tools)</li> <li>• Google (Gmail email provider)</li> </ul>	<p>Cannot add you to our mailing list</p> <p>Cannot send you marketing communications</p>
<b>When you contact us (e.g. customer support, when you submit an inquiry, or leave us a message)</b>				
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Comment / message</li> <li>• Any other data you decide to provide/supply</li> </ul>	<ul style="list-style-type: none"> <li>• To process your request</li> <li>• To assist you with your inquiry</li> </ul>	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (e.g. provide customer support).</p> <p>Legitimate interest (e.g. respond to an inquiry sent by you)</p>	<p>3rd party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> <li>• Google (Analytics)</li> <li>• Firebase (Analytics)</li> <li>• <a href="#">Mixpanel</a> (Analytics)</li> <li>• Facebook Pixels and SDKs (Analytics)</li> <li>• Salesforce (CRM)</li> <li>• <a href="#">Hubspot</a> (Digital Marketing platform)</li> <li>• Survey <a href="#">Monkey</a> (Survey platform)</li> <li>• Mailchimp (email tool)</li> <li>• <a href="#">Bitly</a> (Analytic tools)</li> <li>• Google (Gmail email provider)</li> </ul>	<p>Cannot process your request</p> <p>Cannot assist you and respond to your inquiry</p>
<b>When you attend a marketing event and provide Personal Data</b>				
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Company name</li> <li>• Job position</li> <li>• Any other data you decide to provide/supply</li> </ul>	<ul style="list-style-type: none"> <li>• To establish a business connection</li> <li>• To send marketing communications.</li> </ul>	<p>Depending on the context, consent or legitimate interest (e.g. send you more information about <a href="#">EverCompliant</a> in certain B2B situations)</p>	<p>3rd party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> <li>• Google (Analytics)</li> <li>• Firebase (Analytics)</li> <li>• <a href="#">Mixpanel</a> (Analytics)</li> <li>• Facebook Pixels and SDKs (Analytics)</li> <li>• Salesforce (CRM)</li> <li>• <a href="#">Hubspot</a> (Digital Marketing platform)</li> <li>• Survey <a href="#">Monkey</a> (Survey platform)</li> <li>• Mailchimp (email tool)</li> <li>• <a href="#">Bitly</a> (Analytic tools)</li> <li>• Google (Gmail email provider)</li> </ul>	<p>Cannot establish a business connection</p> <p>Cannot send you marketing communications</p>
<b>When you exchange business cards with us</b>				

Data we collect	Why is the data collected and for what purposes?	Legal basis (GDPR only)	Third parties with whom we share your data	Consequences of not providing the data
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Company name</li> <li>• Job position</li> <li>• Any other data you decide to provide/supply</li> </ul>	<ul style="list-style-type: none"> <li>• To establish a business connection</li> <li>• To send marketing communications.</li> </ul>	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (e.g. showing you certain products and features that you have shown an interest in).</p> <p>Legitimate interest (certain B2B marketing communications)</p>	<p>3rd party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> <li>• Google (Analytics)</li> <li>• Firebase (Analytics)</li> <li>• <a href="#">Mixpanel</a> (Analytics)</li> <li>• Facebook Pixels and SDKs (Analytics)</li> <li>• Salesforce (CRM)</li> <li>• <a href="#">Hubspot</a> (Digital Marketing platform)</li> <li>• Survey <a href="#">Monkey</a> (Survey platform)</li> <li>• Mailchimp (email tool)</li> <li>• <a href="#">Bitly</a> (Analytic tools)</li> <li>• Google (Gmail email provider)</li> </ul>	<p>Cannot establish a business connection</p> <p>Cannot send you marketing communications</p>
<b>When we acquire your Personal Data from third-party sources</b>				
Contact details	<ul style="list-style-type: none"> <li>• To establish a business connection</li> <li>• To send marketing communications</li> </ul>	Depending on the context, legitimate interest (B2B marketing), pre-contractual discussions or consent	<p>3rd party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> <li>• Google (Analytics)</li> <li>• Firebase (Analytics),</li> <li>• <a href="#">Mixpanel</a> (Analytics)</li> <li>• Facebook Pixels and SDKs (Analytics)</li> <li>• <a href="#">Salesforce</a> (CRM)</li> <li>• <a href="#">Hubspot</a> (Digital marketing platform)</li> <li>• Survey Monkey (Survey platform)</li> <li>• Mailchimp (email tool)</li> <li>• <a href="#">Bitly</a> (Analytic tools)</li> <li>• Amazon web services (Cloud)</li> <li>• Google (Gmail email provider)</li> </ul>	<p>Cannot establish a business connection</p> <p>Cannot send you marketing communications</p>
<b>When we use the Personal Data of our customers</b>				

Data we collect	Why is the data collected and for what purposes?	Legal basis (GDPR only)	Third parties with whom we share your data	Consequences of not providing the data
<p><b>Company:</b></p> <ul style="list-style-type: none"> <li>Company name</li> <li>Address</li> <li>Email address</li> <li>Phone number</li> <li>Tax ID</li> <li>Bank account info</li> </ul> <p><b>Customer representatives or employees:</b></p> <ul style="list-style-type: none"> <li>Names</li> <li>Address</li> <li>Email address</li> <li>Phone number</li> <li>Username</li> <li>Passwords</li> <li>Mother's maiden name or other personal info for password hints</li> <li>Contact details/emails</li> </ul> <p>Please note that certain data is also regulated by a Data Processing Agreement.</p>	<ul style="list-style-type: none"> <li>To provide our services</li> <li>To perform the agreement</li> </ul>	<p>Processing is necessary for the performance of a contract to which our customer is a party.</p> <p>Compliance with a legal obligation (e.g. tax laws, bookkeeping laws, etc.).</p> <p>Legitimate interest (e.g. send you contract-related communications)</p>	<p>3rd party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> <li>Mailchimp (cloud)</li> <li>AWS</li> <li>Google (Drive and Gmail email provider)</li> </ul>	<p>Cannot provide the services</p> <p>Cannot communicate with you</p> <p>Cannot perform the agreement</p>
<ul style="list-style-type: none"> <li>Full names</li> <li>Email address</li> <li>Phone number</li> </ul>	<ul style="list-style-type: none"> <li>To send marketing communications</li> </ul>	<p>Consent</p>		<p>Cannot send marketing communications</p>
<p><b>When we use the Personal Data of our suppliers</b></p>				
<p><b>Company:</b></p> <ul style="list-style-type: none"> <li>Company name</li> <li>Address</li> <li>Email address,</li> <li>Phone number</li> <li>Tax ID</li> <li>Bank account info</li> </ul> <p><b>Supplier representatives or employees:</b></p> <ul style="list-style-type: none"> <li>Names</li> <li>Address</li> <li>Email address</li> <li>Phone number</li> <li>Contact details/emails</li> </ul>	<ul style="list-style-type: none"> <li>To contact our service providers</li> <li>To perform/execute the agreement</li> </ul>	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Legitimate interest (e.g. perform the contract, send contract-related communications)</p>	<p>3rd party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> <li>Google drive</li> <li>Priority (financial app) Google (Gmail email provider)</li> </ul>	<p>Cannot communicate with you</p> <p>Cannot perform the agreement</p>
<p><b>When you interact with us on our social media profiles (e.g., Facebook, Twitter, LinkedIn)</b></p>				
<ul style="list-style-type: none"> <li>Full name</li> <li>Email address</li> <li>Company name</li> </ul>	<ul style="list-style-type: none"> <li>To establish a business connection</li> </ul>	<p>Consent</p> <p>Legitimate interest (e.g. send you more information about <a href="#">EverCompliant</a>)</p>	<p>3rd party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> <li>LinkedIn</li> <li>Facebook</li> <li>Instagram</li> <li>Twitter</li> <li>YouTube</li> </ul>	<p>Cannot establish a business connection</p>

Finally, please note that some of the above mentioned personal data will be used for fraud detection and prevention, and for security purposes. The above mentioned personal data may also be used to comply with applicable laws, with investigations performed by the relevant authorities, law enforcement purposes, and/or to exercise or defend legal claims. In certain cases, we may or will anonymize your personal data. "Anonymous Information" means information which does not enable identification of an individual user, such as aggregated information about the use of our services. We may use Anonymous Information and/or disclose it to third parties without restrictions (for example, in order to improve our services and enhance your experience with them).

### **3) Period of Storage of Collected Information**

**Personal Data.** The Personal Data we collect will be stored until we no longer need the information and proactively delete it or until you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws. We have an internal data retention policy to ensure that we do not retain your Personal Data perpetually.

**Cookies.** This depends on the cookie in question. Some cookies (e.g. essential cookies) cannot be disabled. You may also control and delete these cookies through your browser settings. Read more in our cookie policy <https://evercompliant.com/wp-content/uploads/2019/05/Ever-compliant-Cookies-Policy9002063.2.pdf>

### **4) How We Protect and Store Your Information**

**Security.** We have implemented appropriate technical, organizational and security measures designed to reduce the risk of accidental destruction or loss, or the unauthorized disclosure or access to such information appropriate to the nature of the information concerned. However, please note that we cannot guarantee that the information will not be exposed as a result of unauthorized penetration to our servers. As the security of information depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.

**Retention of your Personal Data.** In addition to the retention periods mentioned in Section 1 above, in some circumstances we may store your Personal Data for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, or (iii) if we reasonably believe there is a prospect of litigation relating to your Personal Data or dealings.

## 5) How We Share Your Personal Information

In addition to the recipients described in Section 1, we may share your information as follows:

- To the extent necessary, with regulators, to comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order;
- If, in the future, we sell or transfer some or all of our business or assets to a third party, we will (to the minimum extent required) disclose information to a potential or actual third party purchaser of our business or assets. In the event that we are acquired by or merged with a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer or assign Personal Data in connection with the foregoing events.
- Where you have provided your consent to us sharing the Personal Data (e.g., where you provide us with marketing consents or opt-in to optional additional services or functionality); and
- Where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any Personal Data is disclosed.

*If you want to receive the list of recipients of your Personal Data, please make your request by contacting us at [privacy@evercompliant.com](mailto:privacy@evercompliant.com).*

## 6) Additional Information Regarding Transfers of Personal Information

- Access from Israel is covered by Israel's Adequacy Decision and involves no data transfer issues. You can read more about this here: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en)
- Access from the United States is covered by the EU-U.S. Privacy Shield and the Swiss-U.S. Privacy Shield frameworks. You can read more about this here: <https://www.privacyshield.gov/welcome>. We have certified to the U.S. Department of Commerce that we adhere to the Privacy Shield Principles and our Privacy Shield certification, you can read more about this here: <http://evercompliant.com/privacy-shield-notice/>.
- **Storage of Personal Information:** Amazon Web Services (AWS) with a Primary IT operation in US East, Northern Virginia (6), with a Disaster Recovery (DR) site in EU (Ireland), EU-West-1. Both data centers are owned and operated by AWS.
- **Internal transfers:** We ensure transfers within the EverCompliant group will be covered by an agreement entered into by members of the EverCompliant group (an intra-group agreement) which contractually obliges each member to ensure that Personal Data receives an adequate and consistent level of protection wherever it is transferred to;
- **External transfers:** Where we transfer your Personal Data outside of EU/EEA, for example to third parties who help provide our products and services, we will obtain contractual commitments from them to protect your Personal Data.

Some of these assurances are well recognized certification schemes like the EU-U.S. Privacy Shield for the protection of Personal Data transferred from within the EU to the United States; or

- Where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any Personal Data is disclosed.

## 7) Your Rights

The following rights (which may be subject to certain exemptions or derogations), shall apply to certain individuals (some of which only apply to individuals protected by the GDPR):

- *You have a right to access information held about you. Your right of access is normally be exercised free of charge, however we reserve the right to charge an appropriate administrative fee where permitted by applicable law;*
- *You have the right to request that we amend any Personal Data we hold that it is inaccurate or misleading.*
- *You have the right to request the erasure of the Personal Data that relates to you. Please note that there may be circumstances in which we are required to retain your data, for example for the establishment, exercise or defense of legal claims;*
- *The right to object to or to request restriction of the processing. However, there may be circumstances in which we are legally entitled to refuse your request;*
- *The right to data portability. This means that you may have the right to receive your Personal Data in a structured, commonly used and machine-readable format, and that you have the right to transmit that data to another controller;*
- *You have the right to object to profiling;*
- *You have a right to lodge a complaint with your local data protection supervisory authority (i.e., your place of habitual residence, place or work or place of alleged infringement) at any time. We ask that you please attempt to resolve any issues with us before you contact your local supervisory authority*
- *The right to withdraw your consent. Please note that t there may be circumstances in which we are entitled to continue processing your data, in particular if the processing is required to meet our legal and regulatory obligations.*
- *You also have a right to request details of the basis on which your Personal Data is transferred outside the European Economic Area, but you acknowledge that data transfer agreements may need to be partially redacted for reasons of commercial confidentiality.*

You can exercise your rights by contacting us at [privacy@evercompliant.com](mailto:privacy@evercompliant.com). Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly or inform you if we require further information in order to fulfill your request. When processing your request, we may ask you for additional information to confirm your identity and for security purposes, before disclosing the Personal Data requested to you. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initially requested, we will address your request to the maximum extent possible, all in accordance with applicable law.

## **8) Use by Children**

We do not offer our products or services for use by children. If you are under 18, you may not use the Website, or provide any information to the Website without involvement of a parent or a guardian. We do not knowingly collect information from, and/or about children. If we learn that we have collected Personal Information from a child under 18 years, we will delete that information as quickly as possible. If you believe that we might have any such information, please contact us at [privacy@evercompliant.com](mailto:privacy@evercompliant.com).

## **9) Links to and Interaction with Third Party Products**

The Website may enable you to interact with or contain links to third party websites, mobile software applications and services that are not owned or controlled by us (each a “Third Party Service”). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services may collect Personal Information from you. Accordingly, we encourage you to read the terms and conditions and privacy policy of each Third Party Service that you choose to use or interact with.

## **10) Log Files**

We may make use of log files. The information inside the log files includes internet protocol (IP) addresses, type of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, clicked pages and any other information your browser may send to us. We may use such information to analyze trends, administer the Website, track users’ movement around the Website, and gather demographic information.

## **11) Cookies and Other Tracking Technologies**

Our Website may utilize “cookies”, anonymous identifiers and other tracking technologies in order to for us to provide our Website and present you with information that is customized for you. A “cookie” is a small text file that may be used, for example, to collect information about activity on the Website. Certain cookies and other technologies may serve to recall Personal Information, such as an IP address, previously indicated by a user. Most browsers allow you to control cookies, including whether or not to accept them and how to remove them. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser.

## **12) Analytic Tools**

- **Google Analytics.** The Website uses a tool called “Google Analytics” to collect information about use of the Website. Google Analytics collects information such as how often users visit this Website, what pages they visit when they do so, and what other websites they used prior to coming to this Website.

We use the information we get from Google Analytics to maintain and improve the Website and our products. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google's ability to use and share information collected by Google Analytics about your visits to this Website is restricted by the Google Analytics Terms of Service, available at <http://www.google.com/analytics/terms/us.html/>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <http://www.google.com/policies/privacy/partners/>. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>.

- **Firebase Analytics.** We also use a similar tool called "Google Analytics for Firebase". By enabling this tool, we enable the collection of data about App Users, including via identifiers for mobile devices (including Android Advertising ID and Advertising Identifier for iOS), cookies and similar technologies. We use the information we get from Google Analytics for Firebase to maintain and improve our App(s). We do not facilitate the merging of personally-identifiable information with non-personally identifiable information unless we have robust notice of, and your prior affirmative (i.e., opt-in) consent to, that merger. Finally, please note that Google Analytics for Firebase's terms (available at <https://firebase.google.com/terms/>) shall also apply.

- **Mixpanel.** We collect personally identifiable information such as your email address and your user activity through the use of Mixpanel. Mixpanel's ability to use and share information is governed by the Mixpanel Terms of Use, available at <https://mixpanel.com/terms/>, and the Mixpanel Privacy Policy, available at <https://mixpanel.com/privacy/>. You can opt-out of Mixpanel's services by clicking on the following link: <https://mixpanel.com/optout/>. If you get a new computer, install a new browser, erase or otherwise alter your browser's cookie file (including upgrading certain browsers) You may also clear the Mixpanel opt-out cookie.

- **Facebook Pixels and SDKs.** We use Facebook pixels or SDKs, which are tools that provide help to website owners and publishers, developers, advertisers, business partners (and their customers) and others integrate, use and exchange information with Facebook, as such the collection and use of information for ad targeting. Please note that third parties, including Facebook, use cookies, web beacons, and other storage technologies to collect or receive information from your websites and elsewhere on the internet and use that information to provide measurement services and target ads. Facebook's ability to use and share information is governed by the Facebook Tools Terms, available at: [https://www.facebook.com/legal/technology\\_terms/](https://www.facebook.com/legal/technology_terms/) You can prevent your data from being used by Facebook Pixels and SDKs by exercising your choice through these mechanisms: <http://www.aboutads.info/choices> or <http://www.youronlinechoices.eu/>.

- We reserve the right to use other analytic tools

### **13) California Privacy Rights**

California civil code section 1798.83 permits our customers who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to [privacy@evercompliant.com](mailto:privacy@evercompliant.com). Please note that we are only required to respond to one request per customer each year.

### **14) Our California Do Not Track Notice**

We may collect personally identifiable information about an individual consumer's online activities over time and across different websites when a consumer uses the website. If you choose to operate your web browser "do not track" signals or any other mechanism that provides consumers the ability to exercise choice regarding the collection of such information, we will abide by your request and stop collecting such information. We may allow third parties such as such as companies that provide us with analytics tools, to collect personally identifiable information about an individual consumer's online activities over time and across different websites when a consumer uses the website.

### **15) Deletion of Content from California Residents**

If you are a California resident under the age of 18 and a registered user, California business and professions code section 22581 permits you to remove content or personal information you have publicly posted. To remove, please send an email to [privacy@evercompliant.com](mailto:privacy@evercompliant.com). Please be aware that after removal you will not be able to restore removed content. In addition, such removal does not ensure complete or comprehensive removal of the content or personal information you have posted and that there may be circumstances in which the law does not require us to enable removal of content.

### **16) Automated Collection of Personal Data**

EverCompliant uses different automated technologies to process data from third party sources to help us detect fraud, malware and illegal activities. To the extent EverCompliant is considered a controller and such practices are deemed to be subject to the GDPR, please note that we do not provide a specific notification to data subjects because we believe that an exception of Article 14 of the GDPR would apply. In particular, providing information to a potential suspect or fraudster would seriously frustrate the fraud-prevention purposes. For the same reason, we cannot obtain the consent of the person in question and legitimate interest is the most appropriate legal basis (Recital 47 of the GDPR). However, we have included this paragraph in our privacy policy to inform, in a generic manner, that these practices happen.

### **17) Contact Us**

If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us at [privacy@evercompliant.com](mailto:privacy@evercompliant.com).