

PRIVACY POLICY

Updated 22nd May 2018, Effective from **25th May 2018**

Controller: CALLSTATS I/O Oy (Business ID: 2618223-6), a company duly incorporated under the laws of Finland and having its principal place of business at Annankatu 31-33 C 42, 00100 Helsinki, Finland ("**callstats.io**" or "**we**")

Contact email: support-[at]-callstats.io

1. GENERAL

1.1 This Privacy Policy (hereinafter "Policy") informs you why callstats.io collects, uses or shares your personal data in connection with your customer relationship with callstats.io and the service available at www.callstats.io and any applications made available by callstats.io in connection therewith (together the "**Service**"). It describes the relevant principles and purposes related to processing of personal data by callstats.io.

1.2 The Service may contain links to websites and services of third parties. These websites or services are subject to their own privacy policies as well as terms and conditions. callstats.io does not take any responsibility of third parties' privacy policies, terms and conditions or processing of personal data in such third parties' operations. callstats.io recommends paying attention to such then-current privacy policies and terms and conditions applicable to processing of personal data by third parties. The third-parties are listed in the Data Processing Agreement, which is available upon request.

2. CATEGORIES AND SOURCES OF PERSONAL DATA

callstats.io receives personal data primarily from three sources.

2.1 First, we process end-user data that is sent to us by our customers for the provision of the Service. This data may contain some personal identifiers, for example, end-user's IP Addresses, end-user's device identifier which may be needed to deliver the service. Apart from these, we may receive the end-user's personal data such as end-users' telephone numbers or email addresses from our customers, who may choose to share this personal data based on end-user agreements. In both cases, we have technical and organizational measures in place to remove any personal identifiers of this data. For example, technical measures to handle the data, such as encryption or pseudonymisation, and organizational measures to handle the data, such as employee trainings or privacy awareness during system design.

2.2 Second, we process Customer's personal data as part of the account creation process, typically from employees of customers that sign up to the Service and use it afterwards. That data includes email addresses, call logs, free text fields, other data to identify the users and billing related information.

2.3 Third, we collect cookies and use third-party apps on our website to deliver the service. You will find more information below.

3. THE PURPOSE AND LEGAL BASIS FOR PROCESSING PERSONAL DATA

3.1 Service Provision

The primary purpose of collecting your personal data is to provide our Services to you and to manage and maintain the customer relationship between us and you/the company you represent.

In this case, our processing of personal data is based on the contract between you/the company you represent and us. We also provide a communication service on our website for inquiries about our Service and for the provision of customer service. The processing of personal data in this case is based on your consent to provide your contact details.

3.2 Marketing

We may send you emails to inform you about new features of our services, ask you for feedback, or provide you other relevant information about our services. In this respect, processing of personal data is based on our legitimate interest to provide you relevant information about callstats.io and to promote our services to you. Such communication may include direct marketing, market research or research polls. In some cases, we will also ask you for your consent to send marketing related material, e.g. Whitepapers, Industry Reports, Monthly product updates, Weekly usage data, etc. You may opt-out from any marketing communications at any time by using the unsubscribe links in the email.

3.3 Service development and information security

We also process personal data to improve the quality of our services and to develop new ones. In these cases, the processing of personal data is our legitimate interest to ensure that we have sufficient and relevant information at hand to develop our services. Wherever possible we take appropriate technical measures to protect the privacy of the personal data in our systems.

3.4 Billing related data

We also process personal data to fulfil our obligations under applicable accounting and tax laws. In these cases, the processing of personal data is based on mandatory legal provisions which require that we store certain data for accounting purposes. We take appropriate organizational measures to limit the access to this data within the organization.

4. COMMUNICATION OF PERSONAL DATA TO THIRD PARTIES

4.1 As a rule, callstats.io does not transfer personal data to third parties. We may disclose personal data to third parties only in the following circumstances:

- when permitted or required by law, e.g. to comply with requests by competent authorities or related to legal proceedings;
- when our trusted services providers provide services to us on behalf of us and under our instructions. We engage such services providers for example to help us with marketing, to provide cloud storage or to process payments in a secure way, for example, to send and receive emails. We will control and be responsible for the use of your personal data at all times;
- if we are involved in a merger, acquisition, or sale of all or a portion of our assets; and
- 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.

4.2 Further, for clarification, callstats.io notes that content and material uploaded by you to the Service may be disclosed to third parties. For example, screenshots of errors in the dashboard are delivered to us via a third-party customer support system.

4.3 When necessary and to the extent required for the provision of the Service, personal data may be transferred outside of the European Union or European Economic Area. In such occasion callstats.io shall comply with the requirements of the applicable law concerning such transfer of personal data.

5. DATA RETENTION AND QUALITY

5.1 Your personal data will be retained only for as long as necessary to fulfill the purposes defined in this Policy.

5.2 Most of your personal data will be retained during the course of your customer relationship with callstats.io, in other words as long as there is an account. Some personal data might be retained after your customer relationship with us has ended, if required or allowed by applicable laws. For example, we keep accounting related documents for 6 or even 10 years. When your personal data is no longer required by law or rights or obligations by either party, we will delete your personal data. We pseudonymise the end-user data used for research and development.

5.3 Where required by the applicable law, callstats.io rectifies, erases or supplements possibly erroneous, unnecessary, incomplete or obsolete personal data processed on your request. Please note that you are responsible for the validity and quality of the personal data you provides to callstats.io. You are also responsible for notifying callstats.io of any possible changes in the personal data provided, such as name changes or changes of contact details. For such purpose, please contact callstats.io by using the contact information set out above.

6. DATA SECURITY

6.1 We protect your personal data against unauthorized access, against accidental or unlawful destruction, manipulation, disclosure and transfer and against other unlawful processing by reasonable technical and organisational measures.

6.2 Among the measures we take are: encryption of data in transfer, pseudonymisation for data used for service improvement and deletion of identifiers of unsolicited personal data we receive. We also regularly train our staff on IT security as per our Information Security Policy.

7. COOKIES

7.1 Cookies are files which are received and transmitted by your device when you are using the Service. We may use cookies and similar techniques to provide the Service, to improve its quality and to enhance the user experience. By using the Service and consenting to the use of cookies in your browser settings you agree to the use of cookies by callstats.io. You may prohibit the use of cookies by changing the browser settings. This may, however, affect your experience of the Service.

8. YOUR RIGHTS

8.1 You have a right to access personal data we process about you. You may access, correct, update, change or remove your personal data at any time. However, please note that certain information is strictly necessary in order to fulfil the purposes defined in this Policy and may also be required by law. Thus, you may not remove such personal data for the Service to work. In order to process your request, we need sufficient search criteria from you and we need to identify you.

8.2 You have a right to object for certain processing. In particular, you have the right to prohibit callstats.io to process personal data stored for the purposes of direct advertising, other direct marketing, market research and opinion polls. We advise you to notify callstats.io by using the contact information set out above in this Policy of such prohibition. To the extent required by applicable data protection law, you have a right to restrict data processing.

8.3 You have a right to data portability, i.e. right to receive your personal data in a

structured, commonly used machine-readable format and transmit your personal data to another data controller, to the extent required by applicable law.

8.4 Please send above-mentioned requests to us at support@callstats.io.

8.5 If you think there is a problem with the way we are handling your personal data, you have a right to file in a complaint to your national data protection authority in the EU/EEA.

9. CHANGES TO THIS POLICY

callstats.io may update and amend this Policy and the related information. In those cases, we will publish the changes on our website and use reasonable efforts to inform you about the changes by posting the changed information and documents at callstats.io's website at www.callstats.io and/or by using its reasonable efforts to inform of the change via email, in the Service or otherwise. We recommend that you regularly access the Policy to obtain knowledge of any possible changes to it.