

## **BEWARNED CONNECT PRO PRIVACY POLICY**

When you use our services, you provide and trust us with your information. This Privacy Policy is meant to help you understand what data we collect, why we collect it, and what we do with it. We hope you will take time to read this important information carefully.

As you use our services, we want you to be clear how we're using information and the ways in which you can protect your privacy.

Our Privacy Policy explains what information we collect, who we collect it from, why we collect it and how we use that information.

### **1. Key Terms**

1.1 We try to keep it as simple as possible, but if you're not familiar with certain IT-related terms, then you can read about these terms first.

#### *1.1.1 Device*

A device is a hand-held computer that can be used to access our services (see Terms of Service for BeWarned Connect Pro for more information regarding devices).

#### *1.1.2 Unique device identifier*

A unique device identifier (sometimes called a universally unique ID or UUID) is a string of characters that is incorporated into a device by its manufacturer and can be used to uniquely identify that device (for example an IMEI-number of a mobile phone). We use unique device identifiers for security and fraud detection, syncing services, remembering the user's preferences.

#### *1.1.3 Server logs*

Like most websites, our servers automatically record the page requests made when you visit our sites. These "server logs" typically include your Internet Protocol address, browser type, browser language, the date and time of your request and one or more cookies that may uniquely identify your browser.

#### *1.1.4 Sensitive personal information*

This is a particular category of personal information relating to confidential medical facts, racial or ethnic origins, political or religious beliefs or sexual orientation.

#### *1.1.5 Non-personally identifiable (Un-Personalized) information*

This is information that is recorded about users so that it no longer reflects or references an individually identifiable user.

#### *1.1.6 Session identifier, session ID or session token.*

Session identifier is a piece of data that is used in network communications (often over HTTP) to identify a session, a series of related message exchanges. Session identifiers become necessary in cases where the communications infrastructure uses a stateless protocol such as HTTP. For example, a user who visits a Client's link to our website wants to obtain some information, get some answers to her/his questions, may collect a number of Client's articles from Client's site in a virtual shopping cart and then finalize the shopping by going to the site's checkout page. This typically involves an ongoing communication where several webpages are requested by the clients and sent back to them by the server. In such a situation, it is vital to keep track of the current state of the shopper's cart, and a session ID is one way to achieve that goal.

## **2. Information We Collect**

2.1 We collect information to provide better services to all levels of users of our services such as Business Customers, Authorized Users and Clients (see Terms of Service for BeWarned Connect Pro for more information on these concepts).

## **3. If You Are a Business Customer or an Authorized User**

### *3.1 Information you give us*

Our services require you to sign up for a BeWarned Connect Pro account. When you do, we'll ask for general information about your company, including company's name, street address, email address, phone number, company's credit card and employee's name, workplace location, email address, phone number to store with your account.

This information may include your company's logo, etc.

### *3.2 Information we get from your use of our services*

The information we collect includes:

Device information. We collect device-specific information (such as your hardware model, operating system version and unique device identifiers).

Log information. When you use our services, we automatically collect and store certain information in server logs. This includes:

- Non-personally identifiable information about how you use our service.
- Internet protocol address that can be used to identify the location from which a device is connecting to the Internet.
- Device event information such as crashes, system activity, hardware settings, browser type, browser language, the date and time of your request and referral URL.

Cookies and similar technologies that may uniquely identify your browser or device.

Location information.

When you use our services, we neither collect, nor process information about your actual location.

Unique application or license IDs.

Our service uses a unique application number or license ID. This number and information constitute your package or type of license.

Local storage.

We may collect and store information (unpersonalised information only) locally on your device using mechanisms such as browser web storage and application data caches.

### *3.3 Information we get from your Client's use of your services through our systems (services)*

We get general information, like creating dialogue's time, date and time-length, participating manager's Id, number of messages in each dialogue. We also get dialogue's rating or feedback from your Clients.

### *3.4 Information we get from you if you are an Authorized User*

When you sign into our account, we'll ask you for personal information, like your name, email address, telephone number. It may also include your photo.

## **4. If You Are a Client of our Business Customer**

### *4.1 Information you give us*

You give us no personal information whatsoever in order to use the services. You do not need to provide any information. Registration not required.

We collect no information from your use of our services except the session identifier described below which anyway keeps your information non-personally identifiable. However, BeWarned Connect Pro allows you to rate the dialogue with an Authorized User without requiring any personal information.

### *4.2 Information we get from your use of our services*

Scanning of a QR code placed on a Deaf Friendly sticker provided by us to our Business Customers gets you to an automatically generated HTML page which opens you a chat with an Authorized User (worker) of our Business Customer. The chat session is individually created and marked with un-personalized session identifiers so we do not get any personal information from you. After your communication with an Authorized User (worker) of our Business Customer, the chat is being closed as well as the foregoing HTML page with no application being installed on your device.

## **5. How We Use Information We Collect**

5.1 We use the information we collect from our service to provide, maintain, protect and improve it, to develop new ones, and to protect BeWarned and our users.

5.2 When you contact us, we keep a record of your communication to help solve any issues you might be facing. We may use your email address to inform you about our services, such as letting you know about upcoming changes or improvements.

5.3 We use information collected from cookies and other technologies, to improve your user experience and the overall quality of our services. For example, by saving your language preferences, we'll be able to have our services appear in the language you prefer.

5.4 We will ask for your consent before using information for a purpose other than that set out in this Privacy Policy.

5.5 BeWarned Connect Pro uses end-to-end encryption. In order to keep past communications data (logs, chats) safe, BeWarned processes and stores data using Amazon Web Services using symmetric encryption algorithms.

5.6 We may process your personal information on a server located outside the country where you live.

## **6. Information We Can Share**

6.1 Generally, we do not share your information with companies, organizations and individuals outside of BeWarned at all, unless one of the following circumstances applies:

### *6.1.1 For external processing*

We may provide personal information to our parent companies, affiliates, if any or to other trusted businesses or persons to process it for us, based on our instructions and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures.

### *6.1.2 With your consent*

We can share your personal information with companies, organizations or individuals outside of our company only when we have your consent to do so.

### *6.1.3 For legal reasons*

We will share personal information with companies, organizations or individuals outside of BeWarned if we have a good-faith belief that access, use, preservation or disclosure of personal information is reasonably necessary to:

- meet any applicable law, regulation, legal process or enforceable governmental request;
- enforce applicable Terms of Service, including investigation of potential violations;

- detect, prevent, or otherwise address fraud, security or technical issues;
- protect against harm to the rights, property or safety of our company, our users or the public as required or permitted by law.

#### *6.1.4 Social Sharing Features*

Our service may integrate with social sharing features and other related tools which let you share information about our services or actions you take on our services or apps with other apps, sites, or the media, and vice versa. Your use of such features enables the sharing of information with your friends or the public, depending on the settings you establish with the social sharing service. Please refer to the privacy policies of those social sharing services for more information about how they handle the data you provide to or share through them.

#### *6.1.5 Your California Privacy Rights*

California law permits residents of California to request certain details about how their information is shared with third parties for direct marketing purposes. BeWarned does not share your personally identifiable information with third parties for the third parties' direct marketing purposes unless you provide us with the consent to do so.

#### *6.1.6 Non-Personally Identifiable Information*

We may share Non-Personally Identifiable Information publicly and with third parties. For example, we may share information publicly to show trends about the general use of our services, quantity of people served, etc.

#### *6.1.7 M&A or Asset sale*

If our company is involved in a merger, acquisition or asset sale, we will continue to ensure the confidentiality of any personal information and give affected clients and users notice before the personal information is transferred or becomes subject to a different privacy policy.

#### *6.1.8 Access to personal information to BeWarned employees, contractors, consultants, etc*

We restrict access to personal information to BeWarned employees, contractors, consultants, etc. who need to know that information in discharge of their duties and due to their scope of engagement, and who are subject to contractual confidentiality obligations.

## **7. When This Privacy Policy Applies**

7.1 This Privacy Policy applies to BeWarned Connect Pro and BeWarned Connect and excludes services or applications that may have separate privacy policies.

#### *7.2 Third Parties Privacy Policy*

Our Privacy Policy does not apply to services offered by third parties, including other companies or individuals, as well as services, products or sites that may be displayed to you during the use of our services and applications or by other sites linked from our services.

7.3 Our Privacy Policy does not cover the information practices of other companies and organizations including those who promote and advertise our services.

## **8. Changes**

8.1 Our Privacy Policy may change from time to time. We will post any privacy policy changes and, if the changes are significant, we may provide a more prominent notice (including, for certain services, email notification of privacy policy changes).

## **9. Formal Complaints**

9.1 When we receive formal written complaints, we will contact the person who made the complaint to follow up. We may work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

## **10. Contact Us**

10.1 Your privacy matters to BeWarned so whether you are new to our service or a long-time user, please do take the time to get to know our practices – and if you have any questions contact us.

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