

# IFAX PRIVACY POLICY

*effective as of 2<sup>nd</sup> of June 2020*

## 1. GENERAL PROVISIONS

1.1 This Privacy Policy governs the collection, use and storage of information obtained from users of the iFax platform which includes web, computer and mobile application and website at <https://www.ifaxapp.com/> (collectively the “Platform”). **Amplify Ventures Limited, Registered in England and Wales (No. 10869185), Suite 22 137-139 Brent Street, London, England, NW44DJ London, England** (hereinafter referred to as “iFax”) has a position of a “Controller” within the meaning of the EU General Data Protection Regulation and we shall be responsible for, and be able to demonstrate compliance with, the principles relating to processing of personal data. We can be contacted by sending an e-mail to support@ifaxapp.com or through a contact form available on the Site.

1.2 The information is divided into personally identifiable and non-personally identifiable information depending on whether information can identify the visitor as a specific person.

## 2. COLLECTION AND USE OF PERSONALLY IDENTIFIABLE INFORMATION

2.1 We may obtain some of your personal information in order to provide our Services. The Information we collect is necessary to provide our Services, and we shall not collect any Information which is not required by the nature of our Services. We may collect the following personal Information:

- Name
- E-mail address
- Phone number
- Social media ID
- IP address
- Payment information
- Other information which you choose to provide

### (A) NAME

2.2 In order to use certain Services you may be required to provide your first and last name. We will only use this information to create an account for you, to address you whenever we contact you and to enable the use of this application for its intended purpose.

### (B) EMAIL ADDRESS

2.3 We require your e-mail address when you register to use the Platform, when we need to provide you with the Services, or you may provide it when you contact our support. We will only use your email address in accordance with this Privacy Policy, including the rules for the duration of the collection. We collect your email address to comply with our contractual obligation of providing our Services, or with your consent, depending on the purpose of collection. We will collect your email address in the following cases:

- **When you register for an account with us.** We will collect your email address to create and manage an account for you, to enable the use of this application for its intended purpose, and to send you notifications about your account such as when you want to recover your password, receive a fax, we change our privacy policy, if there is a data breach, or for other

Services related communication. We may from time to time ask you to provide feedback for the Services under our legitimate interest to improve the Platform based the User feedback. An account is necessary to access some of our services and if you do not provide us with your e-mail address for this purpose you will not be able to access these services.

- **When you contact us.** We will collect your email address whenever you contact us. Whenever we collect your email address this way, we will only use it in order to respond to your enquiry.

**(C) PHONE NUMBER**

2.4 We may collect your phone number when you choose to use our services. Some services require a phone number to enable the use of this application for its intended purpose, considering the way fax services function. If you provide your phone number for this purpose we will only use it to deliver requested services and we do not use your phone number for other purposes.

**(D) SOCIAL MEDIA ID**

2.5 We may collect your social media ID on a basis of your consent and in the interest of providing our Services. When you choose to register with your social media account, we will collect your Social Media ID to create an account for you and to connect your account password and email with the right ID. We do not collect your third-party service password. For example, when you choose to register through your Facebook account, you will be referred to the Facebook consent dialogue box, after which, if the consent is provided, we will collect your name, e-mail address, profile photo, and information which is publicly available on your profile in order to create and facilitate your account and user profile.

**(E) IP ADDRESS**

2.6 In order to prevent malicious attempts and exploits of the Site we scan IP addresses and may ban IP addresses that show signs of malicious behaviour such as too many password failures, seeking exploits, sending SPAM, using the product for a service for something other than its intended purpose and similar such activities. We process this information in the interest of protecting the integrity of the Platform and of the databases connected with it, including database of Information obtained from Users. We use your IP address on a basis of a legitimate interest to maintain the integrity and safety of our databases.

**(F) PAYMENT INFORMATION**

2.7 All payments on the Platform are conducted through third party service providers for instance: Stripe Inc. or PayPal Inc, depending on the method of payment. You hereby understand that by making a purchase through our Platform your information is being processed and handled in accordance with Stripe's privacy policy available here <https://stripe.com/us/privacy>, and PayPal's privacy policy available here [https://www.paypal.com/us/webapps/mpp/ua/privacy-full?locale.x=en\\_US](https://www.paypal.com/us/webapps/mpp/ua/privacy-full?locale.x=en_US).

**(G) OTHER INFORMATION YOU CHOOSE TO PROVIDE**

2.8 You may at some point choose to provide other information which is not required for the proper functioning of the Services, such as your name, address, details from your personal life, your personal stories and similar. In all such cases we will use this information only for the purpose for which you disclosed it, for example we may use your name to address you in

communication, or we may use other details to display with the content you provided. If we are not sure as to why you are providing such Information we will contact you wherever possible.

#### **(H) GENERAL**

2.9 Some Services will not be available to you if you do not provide requested Information. We may keep records of any questions, complaints or compliments made by you and the response if any. Whenever you contact us, we shall collect any information which you choose to provide. We shall store and use this information only for the purpose of responding to your inquiries. Information contained within the inquiry, free from any personally identifiable Information, will be stored on our servers or servers of a third-party email processor such as Zendesk for the purpose of improving our Services and providing the best customer support possible.

2.10 We do not sell or rent personal Information to any Third-Party. We use collected Information for our internal and marketing purposes, as necessary by the nature of the Services, and only in accordance with this Privacy Policy. In some instances, we are obliged to comply with court orders and government requests and provide Information or parts of it to authorized bodies.

2.11 We have implemented security procedures and measures in order to ensure appropriate protection of the Information we process, against any misuse, unauthorized access, disclosure or modification. We will remove any Information about you upon your request no later than thirty (30) days after the request has been made.

2.12 We acknowledge that the safety of your Information is one of the highest priorities and therefore only authorized processors have access to your information. Although we take all appropriate measures in respect to keeping your information secure, you understand that no data security measures in the world can offer 100% protection. If we ever find or suspect a personal data breach we will, within seventy-two (72) hours after becoming aware of it, notify the appropriate supervisory authority about the breach and Users where necessary.

2.13 The processing of the information is being performed automatically, without human intervention. However, whenever you contact us through email, the Information within the email may be handled and processed by a real human from our customer support team in order to provide you with the answer to the email.

2.14 Users may request access to, modification and erasure of personal Information and the exercise of the right to object. Such requests are submitted to support@ifaxapp.com.

### **3. COLLECTION AND USE OF NON-PERSONALLY IDENTIFIABLE INFORMATION**

3.1 The Platform and other third-party analytics platforms collect a series of general data and information when a User or automated system calls up the Platform. This general data and information are stored in the server log files. Collected may be (1) the software types and versions used, (2) the operating system used by the accessing system, (3) the date and time of access to the services, (4) the internet service provider of the accessing system, and (5) any other similar data and information that may be used in the event of attacks on our information technology systems.

3.2 We collect this information for breach investigation purposes. When using this information, we do not draw any conclusions about the User. Rather, this information is needed to (1) deliver the content of our Platform correctly, (2) optimize the content of our Platform as

well as its advertisement, (3) ensure the long-term viability of our information technology systems and website technology, and (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

#### **4. iFAX AS A PROCESSOR - COLLECTION AND USE OF PERSONALLY IDENTIFIABLE INFORMATION**

4.1 Regarding the Information we collect from Users about the fax recipients, iFax acts as a processor to comply with the User's request for services. iFax may not use collected Information for their own use and only collects such Information on behalf of the Users. Regarding such Information, Users have the position of a data controller with the meaning of EU GDPR.

#### **5. STORAGE AND TRANSFER OF INFORMATION**

5.1 Information will be stored on secure servers hosted by Amazon Web Services Inc., 1200 12th Avenue South, Suite 1200, Seattle, WA 98144, United States (AWS) and which are hosted globally. Hosted servers are controlled and maintained in accordance with sufficient privacy safeguards. AWS may store or transfer Information on data subjects located in the EU to servers located in countries deemed adequate by the European Commission, or in countries which the European Commission has not deemed inadequate, provided that such countries implement appropriate and suitable safeguards regarding the security of personal information. We may change the hosting services from time to time. We will always make sure that any Third-Party which hosts your information implements adequate level of data protection, as required by the nature of the information.

5.2 Information is stored on the servers only for the duration necessary for providing the Services and maintaining the integrity of our databases.

#### **6. COOKIES AND SIMILAR TECHNOLOGIES**

6.1 Cookies help us optimize and improve the user experience of the site by helping us deliver crucial functionalities. The cookies we use may vary over time as we continuously update and improve our site. Use of cookies is further explained in article 6 of this Privacy Policy.

6.2 By visiting the Site we may use cookies to store some non-identifiable Information in your browser regarding your computer or mobile device and your activities in order to help improve the User experience. Users can deny access to cookies through their browser settings.

#### **7. THIRD PARTY WEBSITES, SERVICES, AND COOKIES**

7.1 Third – Party links. The Platform and faxes may contain links to other external websites that do not fall under our domain. We are not responsible for the privacy practices or the content of such external websites. If you choose to follow such links to external websites, you do so at your risk.

7.2 Mobile Identifiers and Google Firebase. We use third party services like Firebase, Google Analytics for Firebase, and Google Cloud Platform provided by Google Inc. Cookies from such services, Android Advertising ID, Advertising Identifier for iOS and similar technologies are used to collect data for statistical reports. Firebase services by Google collect anonymous statistical data about the App use. You can review Firebase privacy policy here: <https://firebase.google.com/support/privacy/>. Further explanation on how Google uses

Information when its partners' sites or apps are being used can be found on the following page <https://policies.google.com/technologies/partner-sites>.

7.3 Opt – out. Users may opt-out of certain Firebase features - including Google Analytics for Firebase through applicable device settings, such as the device advertising settings for mobile phones or visit the Network Advertising Initiative Opt-out Page for more details <http://optout.networkadvertising.org/#/>

7.4 We may use a Third-Party data processors for support ticketing such as Zendesk, Inc or other. We may transfer your name and email address to such Third-Party to process your Information on our behalf. Third-Party has a position of a “data processor” within the meaning of the EU GDPR while we still remain data controllers with regard to your Information. Zendesk adheres to the US-EU Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework. You can find their policies and procedures with regard to your Information on the following link <https://www.zendesk.com/company/customers-partners/privacy-policy/>.

## **8. INFORMATION RETENTION PERIOD**

8.1 If you register an account with us, we will store your identifiable Information for as long as you have an active account. As soon as you delete your account, we will remove all Information we have collected about you. We may keep your identifiable information for up to 30 days in our backup in order to maintain the integrity of our backup storage data.

8.2 If you do not have an account with us, but have chosen to provide some personal Information, we will delete this information within 45 days of obtaining such Information.

## **9. USER’S RIGHTS**

9.1 You may request to:

- Receive disclosure if your Personal Information is processed, and access your stored Personal Information as well as supplementary information.
- Receive a copy of Personal Information you directly volunteer to iFax in a structured, commonly used and machine-readable format.
- Correct your Personal Information that can be influenced by iFax.
- Delete your Personal Information.
- Object to the processing of Personal Information by iFax.
- Restrict the processing of your Personal Information by iFax.
- File a complaint with a supervisory authority.

9.2 These rights might be limited if they are subject to iFax’s own legitimate interests and regulatory requirements.

## **10. CHANGES TO THE PRIVACY POLICY**

10.1 We reserve the right to change our Privacy Policy at any time. The current version of our Privacy Policy is available through the Platform, indicating the effective date. You are encouraged to periodically check our Privacy Policy.

## **11. CONTACT INFORMATION**

**11.1** If you have any questions regarding our Privacy Policy and how the information is handled, or you wish to access, amend, or update your information feel free to contact us at [support@ifaxapp.com](mailto:support@ifaxapp.com)

## **12. How do I Remove my application data?**

Contact iFax Support to close your account or to your application data: <https://www.ifaxapp.com/support>