

Privacy Policy

June, 2021

We are committed to protecting and respecting your privacy. This notice sets out how we look after your personal data and tells you about your privacy rights and how the law protects you.

1. Introduction

"We", "us" and "our" refer to Pentview and its affiliates. Pentview is an Ukrainian incorporated entity with its registered offices at Ukraine, Kyiv, Ryzka St, 43.

This notice applies when you visit our website: pentview.com, and if you use the services we offer through our websites. It also applies if we otherwise identify you as a potential customer or if you supply services to us. These are all situations where we are acting as a data controller with respect to your personal data, that is when we determine why and how your personal data is processed.

Contact us at hello@pentview.com with any questions in relation to this notice or your privacy rights.

Any changes we make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes.

Our websites may from time to time contain links to and from the websites of other businesses. If you follow a link to any of these websites, please note that these websites have their own Privacy Policies and that we do not accept any responsibility or liability for their privacy obligations. Please check their Privacy Policies before you submit any personal data to these websites.

2. The types of data that we collect and how we collect it

Personal information, or personal data, means any information about an individual from which that person can be identified. We may collect, use, store and transfer different kinds of personal data about you which we collect from various sources as described below:

- Identity Data: includes first name, last name and email address. We collect this data directly from you when you set up an account with us to use our services.
- Contact Data: includes name, email address, work details, address and telephone numbers. We collect this data from you when you request information about our products and services or create an account to use our services. We may also collect this data from third parties, such as trusted lead generators or from publicly available sources such as Linked In and other websites.
- Publication Data: includes details you choose to publish via our websites to others including your Identity Data and Contact Data when you provide testimonials on our websites.
- Transaction Data: includes details of our products and services you have purchased and payments made via our websites. All payments are made through our payment processor. We collect certain of your card details and billing address so that you may make payments to us and to identify your transactions. The source of Transaction Data is yourself and our payment processor.
- Technical Data: includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our websites. We collect this data by the use of cookies and other similar technologies. See our Cookie Policy for details.
- Usage Data: includes information about how you use our websites, products and services. We use third party providers like Google Analytics to collect this data by way of cookies and other similar technologies. See our Cookie Policy for further details.
- Marketing and Communications Data: includes your preferences in receiving marketing communications from us. We collect this information when you sign up for our newsletters, request a demo or other information about our products and services, sign up for a trial or create a user account with us and when you update us with your marketing preferences at any time.
- Profile Data: is data that contributes to building a behavioural profile of you which is built up from a combination of information, for example, your name, username, purchases or orders made by you, your online behaviour and browsing patterns, the electronic devices you use, your interests, preferences, demographics, location data, any feedback and survey responses. We collect this information directly from you when you communicate such information to us, from cookies and other similar technologies which provide information about your online behaviour and browsing patterns and from third party publicly available sources. See our Cookie Policy for further details.

We may also collect, use and share Anonymised Data and Aggregated Data such as statistical or demographic data for any purpose. Anonymised and aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate statistics to understand usage of our websites.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

3. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where you have given your consent to the processing of your personal data for a particular purpose.
- Where it is necessary for the performance of a contract with you or to take steps to enter into a contract with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Purposes for which we will use your personal information

The purposes for which we will process your personal information and the lawful basis of processing on which we rely are described below.

- To register you as a user of our services (whether for a trial or paid subscription) and create your user account so that you may access our services;
- To provide the functionality of our services that you have requested via our web platforms;
- To administer and support the services you have requested including to send service notifications, manage and support the provision of your services, to manage and collect payments and to exercise our legal rights;
- To manage our relationship with you which will include:
 - (a) Notifying you about changes to our terms or Privacy Policy;
 - (b) Asking you to update your information;
 - (c) Dealing with any issues or feedback you may have or asking you to complete a survey;
- To administer, protect and manage our business and websites (including troubleshooting, business operational analysis, testing, system maintenance, support, reporting and hosting of data);
- To follow up sales leads whether sourced by way of sign-up to a trial, demo request or request for information, by third party lead or from internal research;
- To send you marketing communications;
- To use data analytics to improve our websites, products/services, marketing, user relationships and experiences;

- To build profiles of potential purchasers of our products and services and to identify potential purchasers of our products and services;
- To deliver targeted website content and advertisements to you both on our websites and via third party platforms and measure and understand the effectiveness of the advertising we serve to you;
- To purchase goods and services from you for our business.

Children

Our services are not directed to individuals under the age of 13 and you may only create an account to use our services if you are 18 or over.

Marketing

You will receive our marketing communications if you have specifically consented to receive them.

If you have already purchased our products and services and/or signed up for a trial, we may send you information about our similar products or services under soft opt-in consent. Consent in this scenario is taken as given because you have signed up to receive our services already.

You may also receive our marketing communications in your business capacity if you have requested information from us, if you provided us with your details or if we have identified you as someone who may be interested in our products/services.

You can unsubscribe from our marketing messages at any time by following the opt-out links on any marketing message sent to you or by emailing hello@pentview.com at any time.

Marketing, advertising and profiling

We build behavioural profiles of potential purchasers of our products and services and use these to identify and target potential purchasers of our products and services. We build these profiles from Profile Data we collect about you and use it to send you relevant information about our products and services. We also use it to identify the types of people that are interested in our products and services. We use third-party advertising platforms, such as Facebook, Google, Linked In etc. to send you advertising messages that are targeted at you, based on your Profile Data. We use various third-party solutions to help us with these targeted messages. We share your personal information with the third-party advertising platforms, and they will attempt to

match your profile in their database to determine when to show you our advertisements. We analyse information from advertising campaigns to understand their effectiveness. Third-party advertising platforms set their own cookies on our websites which collect information about your visits to our websites. Details of the cookies set and how to manage or decline the setting of advertising and profiling cookies are set out in our Cookie Notice. You can opt out of targeted marketing by emailing hello@pentview.com at any time. We do not make any decisions based on such profiling which produce legal effects on you.

Payments and Profiling

Our payment processor (see Payments via our websites) uses technology to help it make decisions about financial transactions and your card payments which may prevent you from accessing our services or continuing to use our services. In this role, our Payment Processor acts as controller and may monitor insights and patterns of payment transactions and other online signals to reduce the risk of fraud, money laundering and other harmful activity.

4. Providing your personal data to others

Payments via our websites

In processing payment transactions, the Payment Processor acts as a data processor to us but in carrying out fraud monitoring, prevention and detection services, it acts as controller and may monitor insights and patterns of payment transactions and other online signals to reduce the risk of fraud, money laundering and other harmful activity.

On completion of payment, our Payment Processor will provide us with limited payment details (your name, billing address, billing email, card type, expiry date and the last four digits of your payment card number) so that we can manage payment transactions and your account. Full payment details are held securely by the Payment Processor.

Others with whom we may share personal data

We share limited personal data with Pentview affiliates only to the extent required to provide our services and for internal administration purposes.

We share your personal data with selected third parties, including:

- third party service providers who we use to help manage our business. Please email hello@pentview.com if you would like details of our service providers.
- third party apps that you use to sell, support and fulfil your orders but only if you have chosen to integrate any such apps with our services.
- insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims.
- taxation authorities, regulators, law enforcement agencies and other authorities if required by such authorities or by due process of law.
- third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets.

5. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

6. Retaining and deleting personal data

We will retain your personal data for as long as necessary to provide you with our services and for so long as you do not wish to unsubscribe from our marketing communications or from receiving targeted advertising. We will also retain your personal data as necessary to fulfil our contractual obligations and to comply with our legal obligations, resolve disputes, and enforce our agreements.

Where we no longer need to process your personal data for the purposes set out in Section 3 of this Privacy Policy, we will delete your personal data from our systems unless we need to retain a limited amount of information to make sure that we act in accordance with your wishes.

Where permissible, we will also delete your personal data on your request. Information on how to make a deletion request can be found in Section 7, Your rights.

Please email hello@pentview.com if you would like details of our retention periods for different kinds of personal data.

7. Your rights

You have certain legal rights with respect to your personal information depending on your location and applicable laws. You may exercise your rights at any time by contacting us at hello@pentview.com

Your rights:

- Right of access: You have the right to access any personal data we hold about you: we will provide a copy of your personal data that we hold together with details of the purposes of the processing, the types of personal data we hold and the people to whom your personal data has been disclosed.
- Right to rectification: You have the right to have inaccurate or incomplete personal data corrected or to restrict the processing of personal data whilst the accuracy is checked.
- Right to erasure: You have the right to ask to have personal data we hold about you erased. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with law.
- Right to data portability: In certain circumstances, you have the right to have data we hold about you transferred to yourself or another data controller. Note, this right only applies to information that is processed by automated means which you initially provided consent for us to use or where we used the information to perform a contract with you.

Right to object. You have the right to:

- ask us not to process your personal data for direct marketing purposes
- object, on grounds relating to your particular situation, to the processing of your personal data (including profiling) where we are relying on a legitimate interest.
- Right to withdraw consent: You have the right to withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.
- Right to complain: You have the right to lodge a complaint with the Ukrainian Data Protection commissioner, the Ukraine Information Commissioner's Office or other data protection supervisory authority applicable to you if you are unhappy with the way we are handling your personal data.

How We Collect, Use, and Disclose Your Personal Information. The types of data that we collect and how we collect it section describes the personal information we may have collected over the last 12 months, including the categories of sources of that information. We collect this

information for the purposes described in the How we use your personal data section. We share this information as described in the Providing your personal data to others section. We use cookies, including advertising cookies, as described in our Cookie Policy.

Exercising the right to know. You may request, up to twice in a 12-month period, the following information about the personal information we have collected about you during the past 12 months:

- the categories and specific pieces of personal information we have collected about you;
- the categories of sources from which we collected the personal information;
- the business or commercial purpose for which we collected the personal information;
- the categories of third parties with whom we shared the personal information; and
- the categories of personal information about you that we disclosed for a business purpose, and the categories of third parties to whom we disclosed that information for a business purpose.

Exercising the right to delete. You may request that we delete the personal information we have collected from you, subject to certain limitations under applicable law.

Exercising the right to opt-out from a sale. You may request to opt out of any “sale” of your personal information that may take place.

Non-discrimination. The CCPA provides that you may not be discriminated against for exercising these rights.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

8. Contact Us

To obtain information about the Company, this Privacy Policy or any Company-related matters, the Client can write an official letter to hello@pentview.com.