

**SENDTRIC**  
**PRIVACY POLICY**

Last Modified on June 1, 2018

We ask that you read this privacy notice carefully, as it contains important information on who we are, how and why we collect, store, use, and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

## **1. Who we are**

Noosa Labs, Inc. (“Sendtric,” “We,” or “Us”) collects, uses and is responsible for certain personal information about you, as part of the Sendtric website (located at sendtric.com) and the online email countdown timer application (collectively, the “Service”).

For those in the European Union, we are regulated under the General Data Protection Regulation which applies across the European Union (including in the United Kingdom) and we are responsible as controller of that personal information for the purposes of those laws.

## **2. The Personal Information we collect and use**

**Information collected by us:** In the course of providing you with the Service, we collect the following personal information when you provide it to us:

- Your email address and password (your “Account Information”), collected through a registration form, feedback form, or when you email us for technical or other support
- Your name, email address, mailing address, and phone number (your “Billing Information”), when you set up payments through our payment processor
- Your photograph, if you choose to upload one to use as a background image
- Your IP Address, your location (city), your browser type, and your access times and usage statistics (your “Analytic Information”)

**Information shared with us by others:** If you make a payment through our payment processor, Stripe, they may share information about your subscription level with us.

**How we use your Personal Information:** We use your personal information as follows:

- **Newsletters/Announcements:** Sendtric may use your Account Information to send you commercial or marketing messages including, without limitation, newsletters and email communications about our products or services.
- **Technical Support:** We will use your Account Information to contact you regarding any customer or technical support issues, and your Analytic Information in some cases to help solve your technical support issues.

**Who we share your Personal Information with:** We share your Personal Information with certain third parties as part of our operation of the Service. This data sharing enables you to make purchases on the Service and for us to provide you with the Service in the optimal way.

Some of those third-party recipients may be based outside the European Economic Area — for further information, including how we safeguard your personal data when this occurs, see their individual privacy policies linked to above and the section entitled “Transfer of your Information out of the EEA,” below.

We share your Personal Information with the following third parties:

**Payment Processing and Bank Transfers:** We partner with Stripe to process payments for the Service. If you make a purchase through the Service, please review their privacy policy for information about how they collect, process, and share your Billing Information and other personal information. You can find [Stripe’s privacy policy here](#).

**Analytics:** We use third party website and application analytic tools such as Google Analytics and Mixpanel on the Service, that employ cookies to collect certain Analytic Information concerning your use of the Service. You can find their privacy policies at the links below:

Google Analytics – [Privacy Policy](#)

Mixpanel – [Privacy Policy](#)

**Other Sharing:**

We will share your Personal Information if we have a good faith belief that (i) access, use, preservation or disclosure of such information is reasonably necessary to satisfy any applicable law, regulation, legal process, such as a court order or subpoena, or a request by law enforcement or governmental authorities, (ii) such action is necessary to detect, prevent, or otherwise address fraud, security or technical issues associated with the Service, or (iii) such action is appropriate to protect the rights, property or safety of Sendtric, its employees, clients, or users of the Service.

We will not share your personal information with any other third party.

**How long your Personal Information will be kept:** We will keep your Personal Information for the length of time required to provide you with the Service, unless a longer retention period is required or permitted by law. Afterwards, we delete all aforementioned data in our possession within a reasonable timeframe. We do not verify the correctness of personal data that we collect or you provide.

Please note that some data may be retained if necessary to resolve disputes, enforce Sendtric user agreements, and comply with technical and legal requirements and constraints related to the security, integrity and operation of the Service.

**Reasons we can collect and use your Personal Information:** The laws in some jurisdictions require that we notify you of the lawful basis for collecting your Personal Information.

To the extent that such laws apply, we rely on the following as the lawful basis on which we collect and use your personal information:

- **Consent:** At times we may collect, process, store, transfer or disclose your personal data on the basis of your implied or explicit consent, such as when you fill out an account registration form or sign up for a newsletter.
- **To fulfill our contractual obligations:** In order to fulfill our contractual obligations to you, we must collect, process, and store your personal data and information. We must handle your personal data in this manner to process purchases on the Service.

Additionally, we may at times have to transfer or receive your personal data to or from third parties, in order to fulfill other contractual obligations to you. For example, we may have to transfer or receive billing and payment information to or from payment processors for any purchases you make.

- **Furtherance of legitimate interests:** We may collect, process, store, transfer or disclose your personal data in furtherance of those legitimate interests of ours which are not overridden by your interests or fundamental rights and freedoms as set forth in the applicable laws. These legitimate interests include, but are not limited to, (i) providing you with the Service, (ii) protecting our users, staff, and property from fraud and other harm, (iii) collecting information on how you use the Service in order to optimize the design and functionality of the Service, and (iv) communicating with you via e-mail for communications you have explicitly opted into (e.g., notifications about new products and services) or for important communications with you regarding the Service.
- **Legal compliance:** We may collect, process, store, transfer or disclose your personal data to comply with our legal obligations.

**Cookies:** When you use the Service, cookies may be used by us and by third parties to allow the Service to function, to allow you to stay logged in between different sessions, and to help to make your user experience better.

Cookies are not spyware or adware, and can't deliver viruses or run programs on your computer. You may configure your web browsers to accept, reject, or delete cookies, or to notify you when a cookie is being set. We may also use "pixel tags," otherwise known as web beacons or clear gifs. These are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of website users.

For more information about our use of cookies, please [see our cookie policy](#).

**Depersonalized Information:** We may make your Personal Information non-personally identifiable by either combining or aggregating it with information about other users, or by removing characteristics (such as your name or email address) that make the information personally identifiable. This process is known as de-personalizing your information and is used to analyze usage and improve the Service.

**Children's Privacy:** We do not knowingly collect any personal information from children under the age of 13, allow them to create accounts, sign up for newsletters, make purchases, or browse the Service. In addition, we may limit how we collect, use, and store some of the information of EU users between 13 and 16.

Sendtric takes children's privacy seriously and encourages parents to play an active role in their children's online experience at all times. We urge parents to instruct their children never to give out their real names, addresses, or phone numbers, without parental permission, when on-line. If you have any concerns about your child's personal information, please contact us at [support@sendtric.com](mailto:support@sendtric.com).

**Links to Other Sites:** The Service may contain links to other sites or services. If you click on a third-party link, you will be directed to that site or service. These external sites are not operated by us. Therefore, we strongly advise you to review the Privacy Policy of these websites or services. We have no

control over, and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

**Do Not Track:** Because there's not yet a consensus on how companies should respond to web browser-based or other do-not-track mechanisms yet, we don't respond to web browser-based do-not-track signals at this time.

### **3. Transfer of your Information out of the EEA**

Sendtric is based in the United States. No matter where you are located, you consent to the processing, transfer and storage of your information in and to the U.S., and other countries, in accordance with the privacy policies of third parties with whom we share your Personal Information. The laws of the U.S. and other countries governing data collection and use may not be as comprehensive or protective as the laws of the country where you live.

If you would like further information, please contact us (see "How to contact us" below).

### **4. Your Rights**

Under the laws of some jurisdictions, including the General Data Protection Regulation in the EEA, you have a number of important rights with regard to your Personal Information.

- By law, you can ask us what information we hold about you, and you can ask us to correct it if it is inaccurate. If we have asked for your consent to process your personal data, you may withdraw that consent at any time.
- If we are processing your personal data for reasons of consent or to fulfill a contract, you can ask us to give you a copy of the information in a machine-readable format so that you can transfer it to another provider.
- If we are processing your personal data for reasons of consent or legitimate interest, you can request that your data be erased.
- You have the right to ask us to stop using your information for a period of time, if you believe we are not doing so lawfully.
- Finally, in some circumstances, you can ask us not to reach decisions affecting you using automated processing or profiling.

For further information on each of those rights, including the circumstances in which they apply, see [the Guidance from the UK Information Commissioner's Office](#) (ICO) on individuals rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please email us at [support@sendtric.com](mailto:support@sendtric.com). We may ask for additional verification information, such as your username and other information required to be sure that you are the owner of that data.

### **5. Keeping your Personal Information secure**

We have taken steps to put appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorized way.

For example, we limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorized manner. We also employ SSL encryption and Bcrypt password hashing to keep your personal information safe. Our web servers are located in a secured and environmentally controlled location, as well.

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

## **6. How to complain**

We hope that we can resolve any questions or concern you raise about our use of your Personal Information. Please contact us via the methods listed below in the section entitled “How to contact us” to let us know about any of your questions or concerns, and we will get back to you to resolve the issue.

If you are an EU citizen, the General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live, or where any alleged infringement of data protection laws occurred.

## **7. Changes to this Privacy Notice**

This privacy notice was last updated on June 1, 2018.

We may change this privacy notice from time to time. When we do, we will inform you via email to the email address you have provided us with through your account, or by posting a message about the change on the Service.

## **8. How to contact us**

Please contact us if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact us, please send an email to [support@sendtric.com](mailto:support@sendtric.com).