

Privacy policy

Effective on: 29 May 2020. This Privacy Policy completely replaces the previous version.

OWOX is committed to protecting your safety and privacy, and takes its responsibilities regarding the security of information very seriously.

This privacy policy explains what data OWOX collects about you, how and why OWOX uses it, who OWOX discloses it to, and how OWOX protects your privacy.

If you do not agree to this Privacy policy, please do not use our website and our services.

1. Who is collecting and/or processing your data?

OWOX, Inc., a company established under the laws of California, United States of America, with registration number C3725260, (referred to as “OWOX”, “we”, “us”, “our” in this Privacy Policy) is a company that collects and/or processes your data.

Data controller. OWOX collects some personal data from you, for example when you use OWOX website, provide feedback on OWOX services or contact OWOX. In this case, OWOX is the data controller for purposes of European data protection legislation and OWOX takes on the obligations and responsibilities of data controllers, particularly described in General Data Protection Regulation.

Data processor. You may decide to transfer OWOX with your clients’ personal data by using our services. In this case, you are the data controller and OWOX stands out as the data processor for purposes of European data protection legislation and OWOX takes on the obligations and responsibilities of data processor, particularly described in General Data Protection Regulation.

2. What personal data OWOX collects and processes?

The term “personal data” in this Privacy Policy is the information that relates to you and allows OWOX to identify you, either directly or in combination with other information that OWOX may hold. Your personal data may include for example your name, your contact details (email, telephone number), your payment details or information on how you use our website.

The personal data you provide us with is only processed and used in the manner adequate for the purpose for which it was collected. OWOX does not combine personal data that was obtained for a variety of purposes.

When providing the personal data through OWOX website, you consent to the OWOX usage of provided data in accordance with this Privacy Policy and/or any additional agreement between you and OWOX.

OWOX may collect and process the following categories of information about you:

Your contact details (name, surname, telephone number, email, company name, company website)	When you log in or create an account or project in OWOX services When you choose an offer OWOX makes available on its website When you request an OWOX services demonstration or trial When you subscribe for OWOX newsletters When you register for OWOX webinars
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	When you send a request for OWOX technical support When you send a request for third-party services information (e.g. Google Analytics 360)
Your payment details (credit card number, expiry date, etc.)	When you purchase OWOX products or services When you validate your payment details
Your IP, cookies	When you visit our website When you use our services
The communications you exchange with OWOX (for example, your emails, letters, calls, or your messages on OWOX online chat service)	When you contact OWOX or you are contacted by OWOX messages on our online chat service)
Your posts and messages on social media directed to OWOX	When you interact with OWOX on social media
Your feedback	When you reply to our requests for feedback or participate in our surveys
Information about how you use our website	When you navigate on our website
Aggregated data statistics (for personalization of user experience in services)	When you provide your access to Google Analytics account

By using our services, you may be providing us with your clients' personal data. You should therefore ensure that you have collected your clients' respective consents and approval in order to process their data in accordance with applicable data protection law and the Terms of use. We shall be entitled to: obtain, collect, distribute, record, organise, adapt or alter, retrieve, consult, align, combine, transfer, use, store, block, destroy, and conduct the international transfer (including countries that do not ensure adequate level of protection of personal data) of the personal data you provide us with. Your clients' personal data belongs to you and OWOX will follow your instructions in the regard of your client's personal data. It will be stored at Google BigQuery tables and at your Google Cloud Platform project.

We do not knowingly collect personal data from children under 16 without the consent of parents or legal guardians. You must be of age of majority in your jurisdiction to use our website or services. If you are under the age of 16, you may only use our website with the permission of your parents or legal guardian.

We do not knowingly collect personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and genetic data, or biometric data data concerning health or data concerning a natural person's sex life or sexual orientation.

2. Rights of data subjects

You have certain legal rights to access certain personal data we hold about you and to obtain its correction, amendment, portability or deletion.

You may exercise those rights in your account, in the “Settings” chapter, or by contacting us via data-protection@owox.com. We will respond to your request at the soonest, but in any case within 30 calendar days from the date we receive your request.

According to California Consumer Protection Act, consumers from California has the following rights:

- Right to request from OWOX:
 - (1) The categories of personal data that OWOX has collected about you,
 - (2) Categories of sources from which personal data are collected,
 - (3) Business or commercial purpose for the collection or sale of personal data,
 - (4) Categories of third parties to whom OWOX provides personal data,
 - (5) Categories of your personal data that has been sold, and categories of third parties to whom personal data has been sold,
 - (6) The specific personal data that OWOX has collected about you,You can exercise this right by using the method described above.
- The right to non-discrimination in the event you exercise your rights under the California Consumer Privacy Act.

4. How and why OWOX uses your data?

We use your personal data for the following purposes:

4.1. To provide our services to you and technical support

OWOX uses your information to perform OWOX services in relation to your project. For example, to automatically import data into your Google Analytics account, collect Google Analytics unsampled data in your Google BigQuery project, store frequently used queries for Google BigQuery, make transactions, or when you ask for the technical assistance.

4.2. To communicate with you and manage our relationship with you

When you provide your details to submit the request for information on our website, download any material or presentation from our website, request a demo of our services, register for webinar, start a trial or services usage, contacted us on social media, or in any other way express your interest in our services and products, we will communicate with you to respond on your request and subscribe you to our newsletter. You may unsubscribe from us or request to stop any communication with you by clicking the "unsubscribe" link on our email or by replying "unsubscribe" for any emails from our sales or marketing team (if "unsubscribe" link is unavailable). We will honor your request.

Occasionally we may need to contact you by email and/or telephone for administrative or operational reasons, for example in order to send you the confirmation regarding webinar registration, the reply for your request on the technical assistance, to remind you about trail expiry date or pending invoices.

Please be aware that these communications are not made for marketing purposes and as such, you will continue to receive them even if you opt-out from receiving marketing communications.

4.3. To personalize and improve your customer experience

OWOX may use your personal data in order to tailor our services to your needs and preferences and to provide you with a personalised customer experience.

OWOX may also collect information on how you use our website, which pages of our website you visit most, what products you buy, in order to understand what you like. OWOX may use this information to tailor the content and offers that you see on our website and, if you have agreed to receiving marketing communications, to send you relevant messages that we think you like.

4.4. To inform you about our news and offers that you may like

OWOX may send you marketing communications, if you have indicated your interest in our product and services: submitted the request for information on our website, downloaded any material or presentation from our website, requested a demo of our services, registered for webinar, started a trial or services usage, contacted us on social media, or in any other way expressed your interest in our services and products..

Please note that OWOX does not share your contact details and other personal data with other companies for marketing purposes, unless OWOX has obtained your consent to do so.

If you do not want to receive marketing communications from us, you can at any time opt out from receiving marketing communications by updating your account settings or by clicking on the relevant "unsubscribe" link at the bottom of any email you received from us, or by replying "unsubscribe" for any emails from our sales or marketing team (if "unsubscribe" link is unavailable).

4.5. To improve our services, fulfil our administrative purposes and protect our business interests and for marketing purposes

The business purposes for which OWOX will use your information include lead's evaluation, marketing among leads and customers, accounting, billing and audit, credit or other payment card verification, fraud screening, safety, security and legal purposes, systems testing, maintenance and development.

OWOX may use anonymous data, which will not include personally identifiable information or information that identifies or would reasonably be expected to identify you, to collect the OWOX service statistics and to improve and enhance the OWOX services (the data is collected in anonymized form, e.g. in the form of derived metrics and coefficients).

4.6. To showcase the results of using OWOX services or your feedback, only upon prior agreement with you and to the agreed extent

4.7. To comply with our legal obligations and compliance reasons, such as the prevention, detection, or investigation of a crime; loss prevention; or fraud.

OWOX may also use personal information to meet its internal and external audit requirements, information security purposes, and as OWOX otherwise believe to be necessary or appropriate: (a) under applicable law, which may include laws outside your country of residence; (b) to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence; (c) to enforce our terms and conditions; and (d) to protect our rights, privacy, safety, or property, or those of other persons, court order, law or governmental request.

We use your personal data based on:
your consent,

agreement concluded with you, or to take action at your request before concluding an agreement,

compliance with our legal obligations,

based on our legitimate interests, for example, when we use cookies on our website or when we receive your data from advertising campaigns, from open public sources or as a result of communications with you.

5. Security of your data

We are committed to taking appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage to personal data.

Your personal information is stored behind secured networks and is only accessible by a limited number of people who have special access rights to such systems, and are required to keep the information confidential. In addition, all information you supply is encrypted using Secure Socket Layer (SSL).

Our services use official APIs from Google, Bing, Facebook, Yandex, Vkontakte and others, where it is technically applicable to access the data that you provide.

To provide access to Google services, we use OAuth authentication. This is an open authorization protocol, which provides us with limited access to protected resources for our services without passing your data for authorization in your account.

You can limit access to your data in your Google account settings at any time.

We will protect your data in the following ways:

using cryptography, where necessary;

using password, where necessary; and

restricting access to your data (i.e. access to your personal data is granted only to those of our employees or contractors for whom the access is necessary).

6. International transfer of data

As described in this Privacy Policy, OWOX may in some instances disclose your personal data to third parties. Where OWOX discloses your personal data to a third party, we require that third party to have appropriate technical and organisational measures in place to protect your personal data.

OWOX may also allow access to your information by other third parties who act for us for the purposes described in this Privacy Policy or for other purposes preapproved by you.

The information that you provide to us will be held in our systems, which are located on our premises or those of an appointed third party.

Your personal data may be accessed by and processed outside the European Economic Area (the European Economic Area being the European Union and Iceland, Liechtenstein and Norway, also referred to as the “EEA”) – including by OWOX specialists operating outside the EEA, OWOX suppliers or agents operating outside the EEA (this includes persons engaged in, among other things, the fulfilment of your requests and the provision of support services). Where your personal data is transferred outside of the EEA, OWOX requires that appropriate safeguards are in place.

7. Term for data storage

OWOX will not store your personal data for longer than is necessary for the purpose for which it was provided or collected. OWOX will only retain the personal data that serves a legitimate purpose (e.g. applicable legal regulations may require the retention of data, or some data may be necessary for the purposes of billing outstanding amounts).

After 2 years from the moment of last visit of OWOX website, your account and your unsubscription from OWOX newsletters, OWOX at its sole discretion delete your personal data or anonymize it.

OWOX will also delete your personal data within 30 calendar days upon receiving your request for data erasure.

OWOX reserves its right to retain a part of personal data, which are required by applicable law and for the term, required by applicable law (e.g. applicable law may require that some personal data shall be retained for tax accounting or for issues of the invoice for unpaid fees).

8. Sharing your personal data

OWOX uses a limited number of third party providers to assist us in providing the services to our customers. Third parties may access, process or store personal data in the framework and upon our instructions only. OWOX may share your information with the following persons:

Affiliates. OWOX may disclose your information to its affiliates or subsidiaries, which may use your information to provide services to you or to communicate with you regarding services provision on OWOX behalf.

Service Providers. OWOX may disclose the information it collects from you to third party vendors, service providers, contractors or agents who perform functions on OWOX behalf.

Other Third Parties. OWOX may disclose your information to third parties upon your instructions to do so. For example, when you ask OWOX to transfer the data from your CRM to your Google BigQuery project.

Credit and debit card companies. OWOX may disclose your payment details strictly to the companies that process the card payments for the purposes of processing of payment for OWOX services.

Business Transfers. If OWOX is acquired by or merged with another company, if substantially all of OWOX assets are transferred to another company, or as part of a bankruptcy proceeding, OWOX may transfer the information it has collected from you to this company.

9. Cookies or other tracking technologies

In order to improve our services, to provide you with more relevant content and to analyse how visitors use our website, or for direct marketing purposes, we may use technologies, such as cookies, local storage and pixels. Please be aware that in most cases we will not be able to identify you from the information we collect using these technologies.

For example, we use software to monitor customer traffic patterns and website usage to help us develop the design and layout of the website in order to enhance the experience of the visitors to our website. In addition, in order to understand how our customers interact with the emails and the content that we send, we use pixels that allow us to know if the emails we send are opened.

We use cookies and local storage on our website. These technologies are small pieces of information stored by your browser on your computer's hard drive. On your further visits to that website, the information stored in the cookie is sent back to the website. This allows the website to recognise you and tailor its content to your needs.

What cookies does OWOX use?

We use the following types of cookies:

(i) essential cookies, which are essential for the provision of access to our websites and Services;

(ii) functionality cookies, which are used to personalize the content in accordance with your actions on our website;

(iii) performance cookies, which do not identify you individually (until you enter your identification details in any of our forms) but help us to evaluate the website performance and its statistics; and

(iv) targeting/advertising cookies, which help advertise OWOX offers and services on the other sites.

We also use analytics and similar services that collect third-party cookies:

1. Google Analytics, Google Optimize, and Google AdWords (Google Privacy Policy is available at <https://policies.google.com/technologies/ads?hl=en>, text and URL may be changed by Google sole discretion),

2. Intercom (Intercom Privacy Policy is available at <https://www.intercom.com/terms-and-policies#privacy>, text and URL may be changed by Intercom sole discretion),

3. Facebook (Facebook Privacy Policy is available at <https://www.facebook.com/policy.php>, text and URL may be changed by Facebook sole discretion),

4. Twitter (Twitter Privacy Policy is available at <https://twitter.com/en/privacy>, text and URL may be changed by Twitter sole discretion),

5. LinkedIn (LinkedIn Privacy Policy is available at <https://www.linkedin.com/legal/preview/privacy-policy>, text and URL may be changed by LinkedIn sole discretion).

6. Yandex.Metrics (Yandex Privacy Policy is available at <https://yandex.ru/support/legal/confidential/index.html?lang=en>, text and URL may be changed at Yandex sole discretion),

7. AdMixer (AdMixer Privacy Policy is available at <https://sales.admixer.ua/privacy>, text and URL may be changed by AdMixer sole discretion),

8. Zendesk (Zendesk Privacy Policy is available at <https://www.zendesk.com/company/customers-partners/privacy-policy/>, text and URL may be changed by Zendesk sole discretion),

9. Albacross (Albacross Privacy Policy is available at <https://albacross.com/privacy-policy/>, text and URL may be changed by Albacross sole discretion),

10. Other services.

How to reject or delete cookies?

Most web browsers automatically accept cookies. However, you do not have to accept cookies and you can, should you choose to at any time, reject or block the use of cookies and delete all cookies currently stored on your device. You can find out how to do this for your particular browser by clicking “help” on your browser’s menu, or by visiting: www.allaboutcookies.org, <http://www.youronlinechoices.com/uk/your-ad-choices>, <http://optout.networkadvertising.org/>.

However, if you turn off cookies, the functionality of our Services may be limited (i.e. in the case of essential cookies you may not be able to access our websites, your account and services).

10. Links

OWOX websites may contain links to others websites, which are owned and operated independently of OWOX. Therefore, any information you provide to those websites will be governed by their own privacy policy principles and data collection practices. OWOX assumes no responsibility or liability for information handling procedures and/or policies of such independent websites.

11. Revisions

OWOX may make changes to this Privacy Policy from time to time, without the advance notice and any modifications are effective when they are posted at our website.

OWOX may make changes to this Privacy Policy including as part of the new European data protection legislation which will start to apply on 25 May 2018 (the “General Data Protection Regulation”) and Privacy Shield program.

12. Privacy Shield notice

OWOX complies with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Frameworks (referred to as “Privacy Shield”) as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and/or the United Kingdom and/or Switzerland to the United States. OWOX has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this Privacy Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, please visit <https://www.privacyshield.gov/>.

If OWOX receives personal data subject to the certification under the Privacy Shield and then transfers it to a third-party service provider acting as an agent on OWOX behalf, OWOX has certain liability under the Privacy Shield if both (i) the agent processes the personal data in a manner inconsistent with the Privacy Shield and (ii) we are responsible for the event giving rise to the damage.

12.1. Questions or Complaints You may direct any questions or complaints concerning our Privacy Shield compliance to data-protection@owox.com or at our mailing address: 340 S Lemon Ave Ste 2021 Walnut CA 91789 United States.

We will respond to you to resolve your issue as soon as possible but in any event within 30 days from receiving your letter.

12.2 Dispute Resolution If you have not received timely response to your concern, or we have not addressed your concern to your satisfaction, you may seek further assistance, at no cost to you, from EU Data Protection Authorities for EU/EEA/UK Data Subjects (available at http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm), and the Swiss Federal Data Protection and Information Commissioner for Swiss Data Subjects (available at <https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/task.html>), which are an independent dispute resolution bodies.

12.3. Arbitration You may also be able to invoke binding arbitration for unresolved complaints but prior to initiating such arbitration, a resident of a European country participating in the Privacy Shield must first: (1) contact us and afford us the opportunity to resolve the issue; (2) seek assistance from EU Data Protection Authorities for EU/EEA/UK Data Subjects, and the Swiss Federal Data Protection and Information Commissioner for Swiss Data Subjects; and (3) contact the U.S. Department of Commerce (either directly or through a European Data Protection Authority) and afford the Department of Commerce time to attempt to resolve the issue. If such a resident invokes binding arbitration, each party shall be responsible for its own attorney's fees. Please be advised that, pursuant to the Privacy Shield, the arbitrator(s) may only impose individual-specific, non-monetary, equitable relief necessary to remedy any violation of the Privacy Shield Principles with respect to the resident.

U.S. Federal Trade Commission Enforcement Our Privacy Shield compliance is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC).

Contact information

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to data-protection@owox.com.

You may also send your request to our data protection officer – Maksym Voloshyn, email: data-protection@owox.com.

For EU and EEA citizens — you may also contact our EU Representative: BM Data Services Limited, contact email: eurep@bmdataservices.co.uk, contact number: +44 (0) 203 289 8497.

Statement for the performance of California Consumer Protection Act:

Effective from 01 January 2020

Based on Article 1278.130 California Consumer Protection Act we inform you on the following actions, performed in the past 12 months:

1. OWOX collected the following categories of personal data: personal data, listed in paragraph 2 of OWOX Inc Privacy Policy,
2. OWOX did not sell personal data to third parties,
3. OWOX disclosed for a business purposes to its contractors and processors: personal data, listed in paragraph 2 of OWOX Inc Privacy Policy.