

## **CHATERR – END USER PRIVACY POLICY**

Effective as of 1<sup>st</sup> September, 2018 (the "**Effective Date**")

Chaterr Online Ltd. ("**Chaterr**", "**we**", "**us**", "**our**") provides an automatic customer care solution (the "**Platform**") to merchants who use [Shopify](#) to operate and enhance their e-commerce websites (the "**Merchants**"). This Privacy Policy (the "**Policy**") describes how we collect and use your personal data through our Platform. It also describes the rights and options available to you with respect to your personal information.

Please note that this Policy covers the Platform's privacy practices in general matters. The Merchant has an additional privacy policy explaining its own specific privacy practices related to your personal data (the "**Merchant's Policy**"). You should also read the Merchant's Policy.

### **PERSONAL DATA WE PROCESS**

**We process information about your purchases at the Merchant's website.**

Once you have completed the purchase on the Merchant's website, we will receive and process the following information regarding your purchases: email address, full name, purchase amount, purchase date, the item you purchased and your address ("**Transaction Information**").

**We will also collect the information you will provide while chatting with the platform.**

We will also collect any information you choose to provide us within the chat conversation. Such information may include: texts, photos, rating, review text, comments to the review and your responses to other questions that the Bot or the Merchant presents.

**We also collect analytical information about your use of the Platform.**

When you use the Platform we will collect statistical and analytical information about your use of the Platform and/or the Merchant's website, including: IP address from which you accessed the Platform, your Facebook PSID, email, phone, time and date of access, type of browser used, language use, links clicked, and actions taken while using the Platform ("**Analytical Information**")

*The overall personal data outlined above will be referred to as the "**Information**".*

## SOURCE OF PERSONAL DATA

We do not collect the Information we disclosed above only by ourselves. We obtain some of it from the following sources ("Vendors"):

1. **Shopify, Inc.** Shopify's privacy policy is available [here](#).
2. **Google Analytics (Google)**; Google's privacy policy is available [here](#).
3. **Messenger Platform (Facebook)**; Facebook's data policy is available [here](#).

## HOW WE USE PERSONAL DATA

**We use your Information to provide the Platform and our services.** We use your Information on behalf of the Merchant, in order to provide services using the Platform

*The legal basis under EU law for processing and collecting the Information is the Merchant's legitimate interests in operating its e-commerce site.*

**Subject to your consent to the Merchant, we process your Information to allow the Merchant to provide you an automatic customer service.** Subject to your consent given to the Merchant, we process your Information to allow the Merchants to provide you an automatic customer service, with push notification and chatbot technology.

**You may opt-out from Merchant marketing emails** You may 'opt-out' of using your Information for promotional communications at any time by clicking the "Unsubscribe" link at the bottom of any email we send or by sending an email to our support service at: [support@chaterr.me](mailto:support@chaterr.me).

*The legal basis under EU law for collecting and processing your Information for email communications is your explicit consent to the Merchant.*

**We and the Merchant will publicly display your review on the web.** We and the Merchant will publicly display your review on Internet websites and social network

*The legal basis under EU law for publicly posting your reviews is the fulfillment of the review service you requested by submitting your review.*

## **WHEN AND HOW WE SHARE PERSONAL DATA WITH OTHERS**

*We will not share your information with third-parties, except in the events listed below or when you provide us your explicit and informed consent*

### **We share your Information with the Merchant to which you submitted**

We will share your Information with the Merchant to which you submitted. The Merchant will use the information according to its own policies and upon its sole discretion. We will not be responsible for any act of the Merchant.

### **We share your Information with the service providers who assist us in operating our business and the Platform**

We will share your Information with our service providers who assist us to operate our Platform. Our service providers are authorized to use your Information only as necessary to provide us with their services and not for their own purposes. We do not sell your Information to third parties.

### **We may share your Information when you violate the terms of your engagement with Chaterr**

If you have breached the terms of use of the Platform, this Policy or any other agreement you have with Chaterr, abused your rights to use the Platform, or violated any applicable law - Your Information will be shared with third parties (such as legal counsels and advisors), who handle the matter on our behalf, or with the competent authorities.

### **We may share your Information if we are legally required.**

If we are bound to disclose your information by a judicial order or by a governmental or regulatory authority acting within its legal authority, we will comply and share the Information.

### **We may share your Information if we change Chaterr's business structure.**

If we organize the operation of our company within a different framework, or through another legal structure or entity (such as due to a merger or acquisition) - we will share your Information to enable the structural change. However, the receiving party will be bound by this Policy.

## SECURITY AND DATA RETENTION

**How long will we retain your Information.**

We will retain your Information as long as we need it for the purposes for which it was obtained or until you ask us to delete it. If you ask us to delete the Information, we may still have to retain it to comply with our legal obligations, resolve disputes and enforce our agreements.

**We implement measures to secure your Information**

We implement measures to reduce the risks of damage, loss of information and unauthorized access or use of information. However, these measures do not provide absolute information security. Therefore, although efforts are made to secure your personal information, it is not guaranteed, and you cannot expect that our service will be immune from information security risks.

## INTERNATIONAL DATA TRANSFERS

**We will transfer your Information to third countries only in accordance with applicable data protection laws.**

We are based in the State of Israel. The Information we collect from you will be processed in Israel, which is recognized by the European Union ("EU") as having adequate protection for personal data. It will also be processed in the United States, by our service providers DigitalOcean, LLC, CloudFlare Inc., and SendGrid Inc., which are all Privacy-Shield certified.

We only transfer your Information from within the EU to other jurisdictions if they have been deemed to have an adequate level of data protection by the EU, or as otherwise permitted by the applicable data protection laws.

## **YOUR RIGHTS**

**You have the right to access, update or delete your Information and obtain a copy of your Information.**

You have the right to access the personal information about you that we store on our systems, and have us update, correct or delete it. You are also entitled to obtain from us your Information (excluding data we obtained from other sources) in a structured, commonly used and machine-readable format, and have the right to transmit those data to another data controller. If you wish to exercise any of these rights, contact us at [support@chaterr.me](mailto:support@chaterr.me).

**You have a right to submit a complaint to the relevant supervisory data protection authority.**

If you are in the EU, you can lodge a complaint to the supervisory authority under the General data Protection Regulations ("GDPR"), in particular in the Member State of your residence, place of work or where the alleged infringement of the GDPR occurred.

**You must be at least 13 years of age to use the Platform.**

## **MINORS**

The Platform are not intended for minors under the age of 13. **IF YOU ARE UNDER THE AGE OF 13 YOU MAY NOT USE THE PLATFORM.**

**Changes to this Policy.**

## **CHANGES TO THIS PRIVACY POLICY**

This Policy was last updated on the "Effective Date" noted above. We reserves the right to modify this Policy at any time. It is our policy to post any changes we make to this Policy on this page and the changes will be effective upon our publication of the updated Policy except as described below. You are encouraged to review this Policy periodically and to check the "Effective Date" at the top of this Policy for the most recent version. If We makes material changes to how we treat your personal information We will post a notice of such changes through the Platform thirty (30) days prior to the change becoming effective. However, changes made to comply with applicable laws will be effective immediately

## **DATA CONTROLLER AND DATA PROCESSOR**

**We are the data processor on behalf of the Merchant, who is the data controller.** The Merchant is the data controller of your personal data on the Platform. It determines the purposes and means of processing your data. You can review the Merchant's contact information in the Merchant's Policy. We are the data processor of your personal data on the Platform, processing the data on behalf of the Merchant.

## **CONTACT US REGARDING PRIVACY**

**How to contact our European representative details:**

The European representative of Chatterr, for purposes of this Policy is \_\_. If you are within the European Economic Area, you may contact our European representative the at the following address: \_\_. Please add the following subject to all correspondence: \_\_.