

Introductions

This Privacy Policy is effective from May 24, 2018

NexusMedia OÜ (hereinafter - "we", "us", "NexusMedia") is the Estonian company which provides different Shopify Apps to users of shopify.com through a Software as a Service (SaaS) model.

We at NexusMedia have created a Privacy Policy that aims to help you understand what data we collect, what we use it for and how you can exercise your rights. Reading Privacy Policy is important so we hope you will give it time and attention.

For us the privacy and security of our customers, clients and visitors are of paramount importance. We are committed to protecting the data you share with us. This privacy policy explains how we process information that can be used to directly or indirectly identify an individual ("Personal Data") collected through use of our website and Customer's websites or provided by Shopify.

For the purposes of this policy, we define the term "Customer" as a person which have concluded the installation of any of NexusMedia Apps through shopify.com, the term "Customer's Client" as any individual who interacts directly with Customer without interacting directly with us and the term "Visitor" as an individual who visits our website (<https://nexusmedia-ua.com>) and fills our contact form.

We adhere to the following principles in order to protect your privacy:

- principle of purposefulness - we process personal data fairly and in a transparent manner only for the achievement of determined and lawful objectives, and they shall not be processed in a manner not conforming to the objectives of data processing;
- principle of minimalism - we collect personal data only to the extent necessary for the achievement of determined purposes and do not keep personal data if it is no longer needed;
- principle of restricted use - we use personal data for other purposes only with the consent of the data subject or with the permission of a competent authority;
- principle of data quality - we update personal data shall be up-to-date, complete and necessary for the achievement of the purpose of data processing;
- principle of security - security measures shall be applied in order to protect personal data from unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical and organisational measures;
- principle of individual participation - the persons shall be notified of data collected concerning him or her, the persons shall be granted access to the data concerning him or her and the persons have the right to demand the correction of inaccurate or misleading data.

1. Data We Collect

1.1. Websites Visitors

- 1.1.1.** We may collect, record and analyze information of Visitors of our website. Cookies and widget are used by us and our partners (such as McAfee Secure, Intercom, Shopify, Comodo certification authority). We also use Google Analytics, MixPanel and Facebook Pixel for the purpose of analytics. Information collected by this way is stored no longer that 1 year.
- 1.1.2.** We collect data through visits to the website including count of Visitors and visits, length of time spent on the website, pages clicked on or from where Visitors have come.
- 1.1.3.** Visitors can control the use of cookies at the individual browser level. If you reject cookies, you may still use our website, but your ability to use some features or areas of our website may be limited.
- 1.1.4.** We collect name and e-mail address only in a case when Visitor wants to contact us and fills our contact form.
- 1.1.5.** We use the collected data only to communicate with Visitors. If You do not want us to collect your data, please do not use our contact form and do not give your consent for it.
- 1.1.6.** While processing Personal Data of our Visitors, we rely on your consent to the processing of your Personal Data for the purpose to communicate with you. When we share such information with our contractors (which may be located outside of the European Economic Area) in order to provide a requested answer or solution promptly and correctly, we also rely on your consent. We use such data in ways you would reasonably expect and which have a minimal privacy impact. You can withdraw your consents at any time by sending us one more email with your withdrawal and your Personal Data will be deleted in 72 hours.
- 1.1.7.** Please be aware while visiting our site. Visitors can follow links to other sites that are beyond of our sphere of influence. We are not responsible for the content or privacy policies of these other sites.

1.2. Customers

- 1.2.1.** In order to provide services to our Customers we collect its personally identifiable information.
- 1.2.2.** After concluded the installation of any of NexusMedia Apps at Shopify App store, Shopify provides us with the information such as name, company name, email address, address and other relevant data. This information is used by us to identify the Customers and

provide them with services, mailings, notification, support and marketing actions, and to meet other contractual obligations.

- 1.2.3.** If you no longer wish to receive promotional emails, you may opt out of them by replying to one of such emails or send us an email with a request.
- 1.2.4.** We are processing your Personal Data in order to fulfill contracts we might have with you for purposes to provide our services to you (including support, communication, marketing etc.). When we share such information with our contractors (which may be located outside of the European Economic Area) in order to provide high quality support services in emergency cases, we rely on your consent and your request to do so. Processing of Personal Data for marketing purpose is also relied on a consent obtained from you. We use such data in ways you would reasonably expect and which have a minimal privacy impact.
- 1.2.5.** You can withdraw your consents at any time by sending the email with your withdrawal and your Personal Data will be deleted in 48 hours.

1.3. Customer's Clients

- 1.3.1.** Customers may collect, store and process Personal Data of their own Clients via NexusMedia Apps on their websites. We have no direct relationship to the individuals whose Personal Data is processed in this case. Each Customer is responsible for providing a notice to its Clients and third persons concerning the purpose for which Customer collects their Personal Data and how this Personal Data is processed.
- 1.3.2.** We may be a processor with respect to such Personal Data and act on behalf of Customer only in a case when Customer uses our certain Apps including EasyAuth, EasyLocation, EasyLockdown, EasyOrder. In this case we could process such Personal Data as email address (via EasyAuth App), geolocation data and IP-address (via EasyLocation, EasyLockdown App).
- 1.3.3.** We may also process another sorts of Personal Data such phone number and billing information that you provide to our Customer in a form provided by EasyOrder. When Customer's Client decides to use its personal account in socials networks to register an account on Customer's website via EasyAuth, we also process information (a social network authenticator) obtained from social networks for creation of the account on the Customer's website.
- 1.3.4.** While processing Personal Data of our Customer's Clients, we rely on our contract between us and our Client to the processing of Personal Data for purposes to provide our services to our Customer. We act for the benefit of our Customer as of this

processing is necessary for proper functioning of our App integrated in our Customer's websites.

- 1.3.5. When we share such information with our contractors (which may be located outside of the European Economic Area) in order to provide high quality support services in emergency cases, we rely on Customer's consent and Customer's request to do so.

2. Compliance with General Data Protection Regulation (GDPR) and Estonian legislation

- 2.1. For Visitors, Customers and Customer's Clients located in the European Economic Area (EEA) privacy rights are granted and all processing of Personal Data is performed in accordance with regulations and rules following the [Regulation \(EU\) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, known as the General Data Protection Regulation \(GDPR\)](#), and the national legislation of the Republic of Estonia.
- 2.2. We process Personal Data both as a Processor and as a Controller, as defined in the GDPR:
 - NexusMedia with whom you as a Customer has entered into an agreement when installing the Apps will be the Controller for Customer data as outlined above in "Customer" section.
 - Also NexusMedia will be the Controller for Visitor data, as outlined above in "Visitor" section.
- 2.3. For Customer's Client data, as outlined in the "Customer's Client" section, the Customer will be the Controller in accordance with Directive and GDPR, and NexusMedia will be the Processor.
- 2.4. The processing and transfer of personal data is carried out in accordance with the requirements set out in the [Personal Data Protection Act](#) and [Electronic Communications Act](#) of the Republic of Estonia.

3. Data access, data correction, data deletion, data portability and withdrawal of the consent

- 3.1. Visitors and Customers can review, correct, update, delete or transfer their personally identifiable information. For that, contact us directly at support@nexusmedia-ua.com. We will acknowledge your request within seventy-two (72) hours and handle it promptly and as required by law.
- 3.2. You can withdraw your consents at any time by replying the email with your withdrawal and your Personal Data will be deleted in 48 hours.

- 3.3.** Also You have the right to lodge a complaint with a supervisory authority if you think that we violate your rights. You could contact The Data Protection Inspectorate in Estonia via their website (<http://www.aki.ee/>).

4. Data Retention

- 4.1.** We will retain Personal Data for as long as you, as Customer, use our Apps or as you, as Visitor, are continue to communicate with our support team. Your information will be deleted if you did not communicate with the support team for more than 12 months.
- 4.2.** Personal Data of Customer's Clients will be deleted as soon as Customer stops to use our App. Any data collected for the purpose of analytics will be deleted in 12 months after being collected.

5. Information Security

- 5.1.** We care to ensure the security of personal data. We follow generally accepted industry standards to protect the information submitted to us, both during transmission and once we receive it. We maintain technical, physical, and administrative security measures to provide reasonable protection for your Personal Data. When we or our contractors process Your information, we also make sure that your information is protected from unauthorized access, loss, manipulation, falsification, destruction or unauthorized disclosure. This is done through appropriate administrative, technical and physical measures.
- 5.2.** We always use pseudonymisation as a method of securing the Personal Data we process as the Processor.
- 5.3.** There is no 100% secure method of transmission over the Internet or method of electronic storage. Therefore, we cannot guarantee its absolute security.
- 5.4.** We never process any kind of sensitive data and criminal offence data not as a Controller nor as a Processor. Also we never undertake profiling of personal data.

6. Contractors

- 6.1.** We work with third party service providers who provide website, application development, hosting, maintenance, and other services for us. They may be located outside of the EEA. These contractors may have access to, or process Personal Data on behalf of us as part of providing those services for us. We limit the information provided to these service providers to that which is reasonably necessary for them to perform their functions.
- 6.2.** We hereby guarantees that we have data processing agreements in place with our service providers, ensuring compliance with the GDPR and our

contracts with them requiring to maintain the confidentiality of such information. All data transfers inside and outside of the EEA are being done in accordance with these data processing agreements.

- 6.3.** All data transfers are performed in accordance with the highest security regulations. Transfer of Personal Data to countries outside of the European Economic Area may be possible only in the case, when we have obtained your consent for it.
- 6.4.** All data processed by us is stored exclusively in secure hosting facilities provided by DigitalOcean LLC (<https://www.digitalocean.com>) and located in The Kingdom of the Netherlands. DigitalOcean's infrastructure is secured through a defense-in-depth layered approach.
- 6.5.** We use Dropbox (<https://www.dropbox.com/>) provided by Dropbox, Inc to keep back-ups of our data bases with Personal Data.
- 6.6.** We use Trello (<http://trello.com/>) provided by Trello, Inc., Front (<https://frontapp.com/>) provided by frontapp.com, Inc. and Slack (<https://slack.com/>) provided by Slack Technologies, Inc to organize work inside our company, including with Personal Data.
- 6.7.** We use a services provided by Mailgun Technologies, Inc. d/b/a MailGun (<https://www.mailgun.com/>) to send you our marketing and notifications emails and by Google LLC d/b/a Gmail (<https://mail.google.com/>) to communicate with you. This service processes your personal data such as email address and name which are provided by us.

7. Application of this Privacy Policy

- 7.1.** This Privacy Policy is applicable to our website and our Apps. Our website contains links to other websites. Once redirected to another website, this Policy is no longer applicable. This version of the Privacy Policy is effective from May 2018.

8. Acceptance of these Conditions

- 8.1.** We assume that all Visitors and Customers have carefully read this document and agree to its content. If one does not agree with this privacy policy, they should refrain from using our website and Apps.

9. Changes and Updates to Our Privacy Policy

- 9.1.** All changes to this Privacy Policy are effective when they are posted on this page. When we change the policy in a material manner, we will let you know via email prior to the changes become effective and update the 'effective date' at the top of this page.

10. Contact us!

10.1. If you have any questions, the practices of this Site, or your dealings with this website, please contact us at support@nexusmedia-ua.com.

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