

## OneTone Privacy Policy

This is the Privacy Policy of the LOLO.zone Inc. d/b/a OneTone (Collectively, “**OneTone**”, “**we**”, “**us**”) and it supplements the OneTone Terms of Use. OneTone develops software and offers Services through an Application that acts as a smart assistant for communicating with your end customers. Capitalized terms shall have the same meaning given them in the OneTone Terms of Use. When you use the Services, you are consenting to the collection, transfer, manipulation, storage, disclosure and other uses of your information as described in this Privacy Policy. Please note that by creating a User Account, you acknowledge that you have read and understand the Privacy Policy.

### SCOPE OF THIS PRIVACY POLICY

This Privacy Policy describes how OneTone as a data controller collects and uses your personal data if you use our Services or if you show an interest in our Services or use the Application (“**you**” or the “**Client**”). This document also provides important information about your rights.

### DATA CONTROLLER

LOLO.zone Inc., 1 Sansome Street. Suite 3500. San Francisco. 94104, California, USA, is the data controller for the personal data processed in connection with use of our Services. You are either an individual, if you are a person who is interested in using the Application and related Services; a person who is authorized and authorized to act on your behalf (if they are a legal entity) when using the Application and within the provided Services (most often your employees); or your customer.

In the provision of services, we are normally assisted by processors whose operation complies with European standards for the protection of personal data. The processing of personal data by third parties is governed by their own terms of service. You acknowledge that we may pass on your personal data to them for the purposes set out below and you agree that we may also pass on to them personal data of data subjects in accordance with this Policy. We may amend or supplement this Policy. We will inform you about any such change by email.

### We are personal data controllers towards you

In the vast majority of cases, our users are legal entities that are not directly affected by personal data protection; however, if you are an individual, this section may be of interest to you. Otherwise, you can safely skip this section.

By processing your order or registering for a User Account, we start processing your personal data from the position of the personal data administrator. We always process exclusively personal data obtained directly from you or from publicly available databases. Personal data about you is

collected when browsing our website, using the Application and, in particular, through information you input to create a User Account or interact with us.

## **PERSONAL DATA WE COLLECT**

### **Data that you provide to us:**

When you intend to use, or use our Services, we ask you to provide certain personal data (“**Account Data**”) to identify you as a contractual party or a user and to allow you to invite other users, if applicable, and to allow you and the invited users to use our Services. This data may include your name, email address, company and other information, such as names and email addresses of users you want to invite. By voluntarily providing us with personal data of invited users, you represent that you are an authorized user of such personal data and no invited user has objected to such processing by us. We ask for and collect personal data such as your name, address, phone number and email address when you register for a User Account. We will make it clear in case some data is collected on a voluntary basis. In absence of such information, the provision of the information is required for you to be able to use our Services.

### **Data that we collect from you when you use our Services or websites**

We use cookies and other information gathering technologies to provide, market and improve our Services. These technologies may provide us with personal data, information about devices and networks you utilize to access our websites or Services, and other information regarding your interactions with our websites or Services. Web beacons, tags and scripts may be used on our websites or in email or other electronic communications we send to you. These assist us in understanding usage and campaign effectiveness and determining whether an email has been opened and acted upon. We gather certain information and store it in log files when you interact with our websites and Services.

### **Data from other sources**

You may be able to log into certain Services using sign-in services such as Google Authentication. These sign-in services will authenticate your identity, without the need to sign in with a username and password combination.

## **HOW WE USE THE DATA – PURPOSE OF DATA PROCESSING**

We use the personal data which we collect about you to:

- (a) provide, operate, maintain and improve the Services;
- (b) enable you to access and use the Services;
- (c) process and complete transactions, and send you related information, including purchase confirmations and invoices;

- (d) send Services messages, including responses to your comments, questions, and requests; provide customer service and support; and send you technical notices, updates, security alerts, and support and administrative messages;
- (e) send promotional communications, such as providing you with information about products and services, features, surveys, newsletters, offers, promotions, contests, and events; and provide other news or information about us and our partners;
- (f) monitor and analyze trends, usage, and activities in connection with our websites and Services and for marketing or advertising purposes;
- (g) investigate and prevent fraudulent transactions, unauthorized access to the Services, and other illegal activities;
- (h) personalize our websites and Services;
- (i) comply with our legal obligations, including our obligations related to personal data protection.

## **DATA SHARING AND TRANSFERS**

We may share your personal data with our affiliates and third-party service providers to provide data-warehousing, development, analytics and other services for us. These third-party service providers may have access to or process your personal data for the purpose of providing these services for us. We do not permit our third-party service providers to use the personal data that we share with them for their marketing purposes or for any other purpose than in connection with the services they provide to us. We or our service providers may process your personal data within the EU and if the data are exceptionally transferred outside the EU, we do so in accordance with applicable laws and we rely either on [adequacy decisions](#) for the relevant countries, or other transfer mechanisms as may be available under applicable law, such as the [Standard Contractual Clauses](#).

Specifically, to fulfill the purposes stated above, we may transfer to the following:

- Google Analytics, Facebook, LinkedIn and Hotjar statistics services when you visit our site, while the services also provide sufficient guarantees for the transmission of data in the sense of GDPR when they process data in the territory of the European Economic Area.
- MailChimp and Sendinblue email services for sending bulk messages. The personal data of these companies is transferred to the USA. However, the services use Standard Contractual Clauses approved by the European Commission.

We store personal data in repositories and databases:

- Google Cloud Storage: Google LLC, California, USA
- BigQuery: Google LLC, California, USA
- MongoDB: MongoDB Inc., New York, USA
- Redis: Redis Inc., California, USA
- Firestore: Google LLC / Firebase Inc., California, USA
- Algolia: Algolia, Inc., California, USA
- HubSpot: HubSpot, Inc., Massachusetts, US

## **SECURITY OF YOUR PERSONAL DATA**

We take reasonable and appropriate steps to protect your personal data in an effort to prevent loss, misuse, and unauthorized access, disclosure, alteration and destruction.

## **LEGAL GROUNDS FOR PROCESSING (IF YOU RESIDE IN EEA, UK OR SWITZERLAND)**

We process your data for the purposes described in this Privacy Policy, based on the following legal grounds:

(i) When we're pursuing legitimate interests:

We process your information for our legitimate interests and those of third parties. This means that we process your information for things like: providing, operating; maintaining, and improving our Services; enabling you to access and use the Services; promoting the Services; sending promotional communications; monitoring and analyzing trends, usage, and activities in connection with our websites and Services; investigating and preventing fraudulent transactions, unauthorized access to the Services, and other illegal activities; personalizing the websites and Services.

(ii) When we're providing a service:

We process your data to provide a Service you've asked for under a contract between you and us. This means that we process your information for things like: enabling you to access and use the Services; processing transactions, and sending you related information; providing customer service and support; personalizing our websites and Services.

(iii) When we're complying with legal obligations:

We'll process your data when we have a legal obligation to do so, for example, if we're responding to a legal process or an enforceable governmental request.

(iv) With your consent:

We may ask for your agreement to process your information for specific purposes and you have the right to withdraw your consent at any time. For example, we may ask for your consent to publish your testimonial, if it includes your identification. If you wish to withdraw your consent, you can contact us at [info@onetone.ai](mailto:info@onetone.ai).

## **YOUR RIGHTS (IF YOU RESIDE IN EEA, UK OR SWITZERLAND)**

To the extent available by data protection applicable to you (such as [GDPR](#)), you may exercise the following rights:

(a) you may request access to your data from us (information about what your specific data we process and how do we work with them); (b) you may request restriction of the processing your data (which means that we do not delete the data but we will not work with them); (c) you may request data deletion and correction (always if the legal conditions are met); (d) you may object to the processing of data – it means that you may refuse data processing based on a legitimate interest and we will limit processing, unless we prove serious and qualified legitimate reasons for the processing; and (e) you may exercise your right to data portability. To exercise any of these rights, contact us via above mentioned contact details - the easiest way is to send us an email to [info@onetone.ai](mailto:info@onetone.ai). and we would be glad to help you exercise your rights. If you believe that we

are violating legal rules by processing your personal data, you have the right to lodge a complaint with the national supervising authority ([Czech Office for Personal Data Protection](#)).

## **CALIFORNIA RESIDENTS**

Under the California Consumer Privacy Act (“**CCPA**”), we are required to inform California residents who are users about the categories of personal information we collect about you and the purposes for which we will use this information. We collect information which you give us at the registration, in particular your name and email address and information about your use of our Services. We use and disclose the personal information we collect for our business purposes as identified in the CCPA for communicating with you about the Services as well as for legal compliance, performing services, internal operations, protection against security incidents and activities to improve and maintain our business. California residents have the right to request that we disclose what personal information we collect from you, to delete that information, and to opt-out of the sale of your personal information, subject to certain restrictions. We do not, and will not, sell your personal information.

## **MINORS**

We do not knowingly collect any personal data from children under the age of 16. If you are under the age of 16, please do not use or submit any personal data through our websites or Services. We encourage parents and legal guardians to monitor their children’s Internet usage and to help enforce this Privacy Policy by instructing their children never to provide personal data through our websites or Services without parental permission. If you have reason to believe that a child under the age of 16 has provided personal data to us through our websites or Services, please contact us at [info@onetone.ai](mailto:info@onetone.ai). and we will use commercially reasonable efforts to delete that information.

## **DATA RETENTION AND DELETION**

We retain personal data we collect from you where we have an ongoing legitimate business need to do so (for example, to comply with applicable legal, tax or accounting requirements, to enforce our agreements or comply with our legal obligations). When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal data has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing, until deletion is possible. When processing data on your behalf, we will retain such data for as long as our customer instructs us to based on our Service contract with you and/or as required by applicable law.

We always store all communication with customer support for a period of 24 months so that we can provide better services and help you immediately and effectively in cases of recurring application problems, again within the purpose of fulfilling the contract and our and your legitimate interest.

We process other personal data the duration of the User Account and for a period of 3 months from its cancellation. We keep the e-mail address for the time necessary for sending notifications, and also within the legitimate interest, when we can contact you with an offer of our services for another 24 months after the termination of the User Account or until you actively unsubscribe.

### **Processing of personal data in relation to end customers**

If you are a customer of the Client with whom we cooperate, your data may reach us at the moment your personal data is passed on to us by our Client. If Client's customer data are part of the input data, after their acceptance by the Application these data are anonymized to the maximum extent, namely: for statistical, monitoring and reporting purposes, they are anonymized so that it will never be possible to identify the Client's customer. This information is used for the purposes of machine learning of the Application in a manner that the name and surname are kept in a pseudonymized form, that is, in a form where it is not possible to say directly without knowledge of the "key" that it is the Client's personal data. For any questions relating to your personal data sent to our Client, please contact the Client directly.

In San Francisco on 1.1.2022