**IWIS PRIVACY POLICY**

**(Effective 1 of January 2021)**

IWIS takes and considers your privacy seriously, respects and secures it.

This policy describes:

* Who is the data controller for your data under this policy and how you can contact us
* What information we may collect and process about you
* How we may obtain your personal information
* How we may use your personal information
* What is the basis for our use of your personal information
* For how long we keep your personal information
* How we may share your personal information with third parties
* Which countries we may transfer your personal information to
* Your rights regarding your personal information
* Changes to this privacy policy

Please read this policy carefully to be sure how IWIS use your information.

**WHO IS THE DATA CONTROLLER UNDER THIS NOTICE AND HOW YOU CAN CONTACT US?**

IWIS LLC (collectively, “IWIS”, “we”, or “our”) are controllers of your personal data.

If you have any questions or concerns regarding our treatment of your personal data, please contact us at: hello@iwis.io. Our office location is BC Senator, Moskovska st., 32/2, Kyiv, Ukraine, 01010.

**WHAT INFORMATION WE MAY COLLECT AND PROCESS ABOUT YOU?**

We may collect and process personal information from you in the course of our business, including through your use of our website; when you communicate with us via email or other channels; when you sign up for or request service on our website; when you give us data on a webinar, meeting, conference, or event; when you submit an application for a position with us; when you engage our legal or other services or as a result of your relationship with one or more of our staff and clients; and when you respond to our communications or requests for information.

The personal information or personally identifiable information that we may collect, and process includes:

* Basic information, such as your name (including name prefix or title), the company you work or worked for, your title or position and your relationship to a person (for our CRM system)
* Contact information, such as your postal address, email address and phone number(s)
* Financial information, such as payment-related information
* Technical information, such as information from your visits to our website or applications or in relation to materials and communications we send to you electronically
* Information you provide to us for our proposals and services receipt
* Identification and background information provided by you or collected as part of our business acceptance processes
* Identification and background information provided by you or collected as part of our hiring and employment processes
* Identification and background information collected as a part of our services providing to you or company you work for
* Personal information provided to us by or on behalf of our clients or generated by us in the course or providing services to them, which may include special categories of data

**HOW WE MAY OBTAIN YOUR PERSONAL INFORMATION?**

***Personal information you provide to us***

We collect and process personal information from you as part of our business acceptance processes, hiring and employment processes and about you and others as necessary in the course of providing our professional services to you or your company.

***Information we may collect automatically***

Visiting our website does not require you to provide any personally identifiable information, such as your name, address, e-mail address or phone number. When you visit our website, we automatically collect certain information, which, however, does not allow us to identify you. This information may include the following:

*Browsing statistics*

IWIS collects information about the websites’ content mostly viewed by the visitors, frequency of the connections to the website, software and hardware exploited to visit our website, geography of our visitors. This information enables IWIS to understand the manner how the visitors work with our website. In order to obtain such information we use Google Analytics (the detailed information about this tool is available [here](https://support.google.com/analytics/answer/1012034?hl=en&ref_topic=6157800)). You may disable any data collections by this tool at your discretion as instructed [here](https://tools.google.com/dlpage/gaoptout/).

We rely on our legitimate interest to provide customized services and better our content when collecting your browsing statistics.

*Logs*

The hardware of our website hosting provider may record requests made by the visitors to the website, the information on software and hardware exploited to visit our website, IP address assigned as well as timing related to access. We use this information to enhance the security of our website.

We rely on our legitimate interest to ensure security of our website when collecting your logs data.

*Cookies*

A cookie is a text string that IWIS website transfers to the cookie file of the browser on your computer so that the website can remember your preferences. You may find more information about cookies [here](https://www.aboutcookies.com/).

|  |  |  |  |
| --- | --- | --- | --- |
| **Cookie Name** | **Source** | **Expiration** | **Purpose** |
| xguards\_accept\_cookie | iwis.io | 4 years  | Cookie policy agreement |
| \_cfduid:Cloudflare | iwis.io | 30 days  | Used to maximize network resources, manage traffic, and protect our Customers’ sites from malicious traffic |
| \_gat:Cloudflare | iwis.io | 10 minutes  | Used for throttling requests to Google Analytics to increase the efficiency of network calls |
| \_ga:Cloudflare | iwis.io | 2 years  | Used for visitor tracking |
| \_gid:Cloudflare | iwis.io | 24 hours  | Used to group the user behavior together for each other |
| twofas\_session\_id | iwis.io | 1 hour  | Used for authentication on the site |
| xguards\_post\_{number}\_liked | iwis.io | 3 years | “Like” under post / article |
| fr  | facebook.com | 3 months | Cookie is placed by: Facebook.The functionality is: to provide ad delivery or retargeting |
| \_gid | iwis.io | 1 day | Cookie is placed by: Google Analytics.The functionality is: to store and count pageviews. |
| NID | google.com,google.com.ua | 6 months | Cookie is used by: Google Ads OptimizationThe functionality is: to provide ad delivery or retargeting, store user preferences. |
| \_dc\_gtm\_UA-\* | iwis.io | 1 minute | Cookie is placed by: Google Analytics.The functionality is: to store number of service requests. |
| \_gcl\_au | iwis.io | 3 months | Cookie is placed by: Google Adsense.The functionality is: to store and track conversions. |
| IDE | doubleclick.net | 2 years | Cookie is placed by: Google DoubleClick.The functionality is: to provide ad delivery or retargeting. |
| \_fbp | iwis.io | 3 months | Cookie is placed by: Facebook.The functionality is: to store and track visits across websites. |
| \_ga | iwis.io | 2 years | Cookie is used by: Google Analytics. The functionality is: to store and count pageviews. |
| APISID | google.com,google.com.ua | 2 years | Personalises Google ads on websites based on recent searches and interactions. |
| SSID | google.com,google.com.ua | persistent | Google collects visitor information for videos hosted by YouTube on maps integrated with Google Maps. |
| \_\_Secure-1PSID | google.com,google.com.ua | 2 years | Targeting cookie. Used by for targeting purposes to build a profile of the website visitor's interests in order to show relevant & personalised Google advertising. |
| \_\_Secure-3PSIDCC | google.com | 2 years | Targeting cookie. Used by for targeting purposes to build a profile of the website visitor's interests in order to show relevant & personalised Google advertising. |
| \_\_Secure-3PAPISID | google.com,google.com.ua | 2 years | Builds a profile of website visitor interests to show relevant and personalized ads through retargeting. |
| \_\_Secure-3PSID | google.com,google.com.ua | 2 years | Builds a profile of website visitor interests to show relevant and personalized ads through retargeting. |
| \_\_Secure-1PAPISID | google.com,google.com.ua | 2 years | Targeting cookie. Used by for targeting purposes to build a profile of the website visitor's interests in order to show relevant & personalised Google advertising. |
| HSID | google.com,google.com.ua | 2 years | Security cookie to confirm visitor authenticity, prevent fraudulent use of login data and protect user data from unauthorized access. |
| SID | google.com,google.com.ua | 2 years | These cookies are set via embedded youtube-videos |
| SIDCC | google.com | 3 months | Security cookie to confirm visitor authenticity, prevent fraudulent use of login data and protect visitor data from unauthorized access. |
| pll\_language | iwis.io | 1 year | System cookie for multilingual operation |
| agreecookies | iwis.io | 1 year | System cookie when agreeing to use cookies |
| 1P\_JAR | google.com | 1 month | These cookies are used to collect site statistics and track conversion rates. |
| OGPC | google.com | 8 months | These cookies are used by Google to monitor the use and enable the functionality of Google Maps. |
| S\_adsense3-ui | [google.com](http://google.com/) | End of session | Contains information about how the end user uses the website. |
| S | .google.com | End of session | Google session cookie |
| SEARCH\_SAMESITE | .google.com | 2 years | Used to prevent the browser from sending the cookie along with cross-site requests. |
| b24\_sitebutton\_hello | iwis.io | 4 hours | Cookie is set when clicking on the chat box |

We use cookies data to analyze visitor’s behavior and improve user’s experience. You may disable cookies by your browser settings or by clicking [here](https://tools.google.com/dlpage/gaoptout/).

We rely on our legitimate interest to ensure technical functionality of the website when collecting your cookies data.

***Information we collect from other sources***

We may receive information about you from other sources, including third parties that help us: update, expand, and analyze our records; identify new customers; prevent or detect fraud. We may also receive information about you from social media platforms including but not limited to when you interact with us on those platforms or access our social media content. The information we may receive is governed by the privacy settings, policies, and/or procedures of the applicable social media platform, and we encourage you to review them.

**HOW WE MAY USE YOUR PERSONAL INFORMATION?**

IWIS collects and processes personal information about you in several ways, including through your use of our website and in the provision of services by us. We use that information:

* To respond to your requests
* To provide you with cybersecurity and other services that you request
* To provide and improve this website, including auditing and monitoring its use
* To manage and administer our relationship with you and our clients including to receive feedbacks and maintain our list of contacts
* To promote our services, including sending updates, publications and details of meetings, events, and seminars, proposals and other materials to support our business activities and provide you with our services
* To assess the quality of our services and the effectiveness of our events, promotional campaigns, and publications
* To fulfil our legal, regulatory and risk management obligations, including establishing, exercising or defending legal claims, protecting your, our, or other’s rights
* For the purposes of recruitment

**WHAT IS THE BASIS FOR OUR USE OF YOUR PERSONAL INFORMATION?**

We use your personal information on the following basis:

* To perform a contract, such as engaging with an individual to provide cybersecurity or other services
* To comply with legal and regulatory obligations
* For legitimate business purposes
* Consent – where required by applicable laws, we will rely on your consent for direct marketing

**FOR HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?**

IWIS will retain collected personal information as long as necessary to fulfil the purposes for which it was collected and processed. An appropriate retention period is determined on the amount, nature and sensitivity of the data collected, the potential risk of harm from unauthorized use or disclosure of it, the purposes for which we process personal data and whether we can achieve those purposes through other means and applicable legal requirements.

Upon expiry of the applicable retention period we will securely destroy your personal data immediately.

**HOW WE MAY SHARE YOUR PERSONAL INFORMATION WITH THIRD PARTIES?**

We may also share your personal information with certain third parties in accordance with contractual arrangements in place with them, including:

* Our professional advisers, auditors, potential transaction partners
* IT service providers to IWIS including providers of cloud services and client relationship management (CRM) services
* Third parties engaged in the course of the services we provide to clients and with their prior consent, such as consultants outside Ukraine and technology service providers
* Third parties involved in hosting or organizing meetings, events or seminars

Where necessary, or for the reasons set out in this policy, personal information may also be shared with regulatory authorities, courts, tribunals, government agencies and law enforcement agencies.  While it is unlikely, we may be required to disclose your information to comply with legal or regulatory requirements. We will use reasonable endeavors to notify you before we do this, unless we are legally restricted from doing so.

If in the future we re-organize or transfer all or part of our business, we may need to transfer your information to new IWIS entities or to third parties through which the business of IWIS will be carried out.

We do not sell, rent or otherwise make personal information commercially available to any third party, except with your prior permission.

**WHICH COUNTRIES WE MAY TRANSFER YOUR PERSONAL INFORMATION TO?**

In order to provide our services, we may need to transfer your personal information to locations outside the jurisdiction in which you provide it or where you are viewing this website for the purposes set out in this privacy policy. This may entail a transfer of your information from a location within the European Economic Area (the “EEA”) to outside the EEA, or from outside the EEA to a location within the EEA.

The level of information protection in countries outside the EEA may be less than that offered within the EEA. Where this is the case, we will implement appropriate measures to ensure that your personal information remains protected and secure in accordance with applicable data protection laws including without limitation EU standard contractual clauses.

**YOUR RIGHTS UNDER THIS POLICY**

Contacting us via e-mail at hello@iwis.io you may exercise your right:

* The right to request access – You have right to request access to your personal data and request information in relation to its processing; Our Company will provide you copies of your personal data.
* The right to rectification – You have the right to request correction of any information you consider inaccurate. You also have the right to request completion the information you consider incomplete.
* The right to erasure – You have the right to request us to erase your personal data, under certain conditions.
* The right to restrict processing – You have the right to request us restrict your personal data processing, under certain conditions.
* The right to object processing - You have the right to object your personal data processing, under certain conditions.
* The right to withdraw consent - You have the right to withdraw consent to your personal data processing (if it was given).
* The right to lodge a complaint - You have the right to lodge a complaint in relation to IWIS` processing of your personal information with a local supervisory authority Contact information of the local supervisory authority can be accessed at <https://online.ombudsman.gov.ua/en>. You may exercise your rights in accordance with applicable data protection laws.

If personal data is erased at your request, IWIS will only retain such copies of the information as are necessary to protect our or third party legitimate interests, comply with governmental orders, resolve disputes, troubleshoot problems, or enforce any agreement you have entered into with IWIS.

Your objection (or withdrawal of any previously given consent) could mean that we are unable to perform the actions necessary to achieve the purposes set out above or that you may not be able to make use of the services and products offered by us. Please note that even after you have chosen to withdraw your consent, we may be able to continue to process your personal information to the extent required or otherwise permitted by law, in particular in connection with exercising and defending our legal rights or meeting our legal and regulatory obligations.

**MINOR’S DATA PROCESSING**

Our site is neither directed nor targeted to individuals under the age of 18. If you are under the age of 18, do not provide us with any personal information. If we learn that someone under 18 has provided personal data at our website, we will erase it immediately.

**LINKS**

Our website may contain links to third-party websites. IWIS is not responsible for the privacy practices or the content of such websites.

**CHANGES TO THIS POLICY**

We reserve the right to update this policy from time to time. Therefore, we encourage you to periodically review this page. If we make any material changes in the way we collect, use, and/or share the personal information that you have provided, we will notify you by posting notice of the changes in a clear and conspicuous manner on the IWIS website.