

# Privacy Policy

Bloomip, Inc., a California corporation is the owner and operator of this website, [www.bloomip.com](http://www.bloomip.com) (the "Website"). This privacy policy applies to the processing of personal data within and in connection with the Website and does not cover the processing of personal data collected by us in other contexts. We are responsible for the processing of your personal data when you access, use or interact with the Website and for compliance with applicable data protection laws and regulations, including the EU General Data Protection Regulation (GDPR), as applicable.

The following sections explain our collection, use, disclosure, retention, and protection of your personal data.

## **1. Collection, Processing and Use of Personal Data**

### **1.1 When you ask us for information on the "Contact Us" Page**

2. We collect your business name, name, email address, and phone number when you submit a message to us to request a follow-up on the Contact Us Page. We may also collect information about your business needs and size, if such information is submitted by you.
3. [For Citizens of EU Member States Only] For this purpose, we use consent as the legal basis to process your data, in accordance with Art. 6 (1) (a) GDPR.

### **3.1 When you register for an Account on the Website**

We may collect the following information when you register for a client account ("Account") as a registered user ("User"):

- Company name
- Company address
- Phone Number
- First Name and Last Name
- Email Address
- Business Type
- Markets in which you operate
- Products of Interest
- Number of Locations and Employees
- Annual Revenue
- Job Title
- Number of Years in Business

We process such data to facilitate initial Account registration and creation, and to enable subsequent account management, including to enable Users to keep their Account information up to date and to update or add information to an Account. You can review and change the Account information at any time (except with respect to the email address and the company name) by logging in to your Account. In addition, you can request the complete deletion of your Account, by sending an email to [privacy@bloomip.com](mailto:privacy@bloomip.com).

## 3.2 When you use the Website

When a User logs in to the Account and uses the Website, we collect the following data:

- Feedback left by User
- Communication messages
- Behavioural data on the Website

We collect such data in order to facilitate transactions on the Website, and to provide other services requested by you as described when we collect the information.

In addition, we collect the following data for statistical and analytics purposes and in order to enable the seamless functioning of the Website:

- type, frequency and intensity of the Website use
- duration of the registration
- amount of sessions
- amount of connections
- amount of updates
- transactions and orders

[For Citizens of EU Member States Only] We currently do not offer our products for sale in EU member states. However, for these purposes, we rely on our legitimate interests, where your rights and freedoms do not outweigh these interests, in accordance with Art. 6 (1) (f) GDPR.

## 4. Use of Personal Data for Marketing and Advertising Purposes

### 4.1 Newsletter/ Email Marketing/ Online Marketing

We may in the future invite users to subscribe to our newsletter or other mailing list. If you subscribe to our newsletter (or mailing list), we will use the data required for this purpose or the data disclosed separately by you in order to send you our email newsletter or offers for additional services that may be of interest to you based on your consent, in accordance with Art. 6 (1) (a) GDPR.

You may opt-out by unsubscribing from the newsletter at any time either by email to [privacy@bloomip.com](mailto:privacy@bloomip.com), by changing your communication preferences in your Account or using the unsubscribe link at the bottom of the respective newsletter.

We may contract third parties for the technical handling of our promotional activities and may disclose your data to such third parties for this purpose (see also Section 3 below).

## 5. Data Disclosure to Third Parties

We may disclose your personal information to the following parties, for the following purposes:

**Third party service providers** who help us to provide our services on the Website (e.g. hosting company (i.e. currently Webflow.com (subject to change) and Google Analytics for tracking visitors) to assist us with the prevention, detection, mitigation, and investigation of potentially illegal acts, violations of our Terms & Conditions, fraud and/or security breaches, and other business operations.

**Law enforcement or governmental agencies**, to comply with our legal requirements, enforce our Terms & Conditions, respond to claims, or protect anyone's rights, property or safety.

The use by the mentioned third parties of the disclosed data is strictly limited to these mentioned purposes. We will never disclose your personal data to a third party for marketing purposes without your consent.

## **6. Access, Correction and Deletion Rights**

You are entitled, at any time, to request information about the personal data that we maintain about you and/or to view and modify such data. You can modify the data within your account by logging in to your Account.

You may also request to have your personal data corrected or deleted at any time. This request must be submitted by email to [privacy@bloomip.com](mailto:privacy@bloomip.com). Please note that deleting your personal data and/or an Account may render the use of our services and access to the Website fully or partially impossible.

You may also have the right to request the release of the data you have given us (right to data portability). On request, we will forward the data to a third party of your choice, in a commonly used file format.

Where the processing is based on our legitimate interests, you have the right to object at any time to the processing. Where processing is based on consent, you have the right to withdraw consent to the processing at any time. If you withdraw your consent, this will not affect the lawfulness of the processing based on your consent before its withdrawal.

Please note that statutory retention periods may apply for certain data. We are obligated to store such data up to the expiry of the respective period. We will block these data in our system and only use them to meet our legal obligations.

In respect of your aforementioned rights, you can contact us at the email address [privacy@bloomip.com](mailto:privacy@bloomip.com). You will find other options for contacting us under Section 14 below. We may, at our discretion, require proof of identity to process your request. Furthermore, your rights under this section 4 pertains to only your personal data, and does not pertain to any non-personal statistical or analytical data collected by the hosting company or Google Analytics.

## **7. Data retention**

We only retain your personal data as long as it is necessary and relevant to fulfil the purposes for which it was collected and to comply with applicable laws.

Please note that according to the law, specific data must be stored for a specific period of time. Such data must therefore remain with us until this period has expired. We block this data in our system and use it only in order to meet statutory requirements. Once relevant retention periods have lapsed, we dispose of your personal data in a secure manner.

## **8. Data security**

We take appropriate technical and organizational security measures to protect your personal data against the risk of loss, misuse, unauthorized access, disclosure and alteration. For instance, all information you provide to us is encrypted and also stored on our secure servers behind firewalls. We continually adapt our security measures to reflect technological developments.

We also take internal protection measures. Our employees and the service providers that we mandate are obliged to maintain secrecy and comply with applicable data protection laws. In addition, employees and service providers are only granted access to personal data on a "need

to know” basis. While we strive to do our best to protect your personal data, we cannot absolutely guarantee that unauthorized access to, or disclosure of, your personal data will never occur.

## **9. Cookies**

In order to make a visit to our Website more attractive and facilitate the quality and use of certain features, we use "cookies". Cookies are small files that are stored on your device and save specific settings and data for exchange with our system via your browser. Some of the cookies that we use are deleted again at the end of the browser session, in other words after you close your browser (so-called "session cookies"). Other cookies remain on your terminal and enable us to recognise your browser the next time you visit the Website (persistent cookies). Cookies do not contain personal data and cannot therefore be assigned to a user. Based on cookie technology, we receive only anonymous information, for example, which pages on our Website have been viewed, etc. Please keep in mind that certain cookies are already set when you access our Website. You can configure your browser in such manner that you are notified about the setting of cookies and decide on in the individual case whether to accept them or not or exclude the acceptance of cookies in certain cases or generally.

Internet browsers allow you to control the storage of cookies on your computer. This is described in the Help menu of each browser and explains how to change your cookie settings. You can find the description for the respective browsers under the following links: [Internet Explorer™](#), [Safari™](#), [Chrome™](#), [Firefox™](#), [Opera™](#)

Deactivating cookies may render some functions of our Website unusable.

## **10. Tracking Tools**

For the purposes of needs-based design and the continuous optimization of our pages, we use a service provided by Google Analytics. In this respect, pseudonymised user profiles are created and small text files ('cookies') stored on your computer and used. Information generated by the cookie about your use of the Website, such as

- the browser type/version
- the operating system used
- the referrer URL (previous page visited)
- the host name of the accessing computer (IP address)
- the time of the server request
- the device

The information is used to analyze use of the Website, to compile reports about Website activities and to provide us with further services relating to Website use for the purposes of market research and needs-based design for the Website.

## **11. Links to our social media presence**

We will in the future incorporate links on the Website to our social media profiles and channels on the following social networks:

- Twitter
- Facebook
- LinkedIn
- Google Plus

If you click on the relevant social network icons, you will be automatically redirected to our profile on the relevant network. In order to use the functions of the relevant network there, you must partially log in to your user account for the relevant network.

When you open a link to one of our social media profiles, a direct connection is established between your browser and the server of the relevant social network. This gives the network the information that you have used our Website with your IP address and accessed the link. If you access a link to a network while logged in to your account on the relevant network, the contents of our page may be linked to your profile in the network, which means that the network can link your visit to our Website directly to your user account. If you want to prevent this, you should log out before clicking on the relevant links. An assignment takes place in any case, if you log into the relevant network after clicking on the link.

Please be advised that we are providing these links to you as a convenience only, and you agree that we are not responsible for the content, data collection, and privacy policies for those third party websites. For more information about the purpose and scope of the data collection and further data processing by the above social media networks and your respective rights and data protection options, please see their respective privacy policies.

## **12. Third Party Privacy Practices**

This privacy policy addresses only our use and handling of personal data that we collect from you in connection with providing you our services through the Website. If you disclose your information to a third party, or visit a third party website via a link in our Website, then their respective privacy policy will apply to any personal data that you provide to them or they collect from you.

We cannot guarantee the privacy or security of your personal data once you provide it to a third party and we encourage you to consult the privacy policies and security policies of third parties before entering into a transaction and choosing to share your personal data.

## **13. Children's Privacy**

The Website is only intended for persons who are aged 18 or older; and we do not knowingly collect personal data from any person under age 18. If you are under the age of 18, you are not permitted to use the Website.

## **14.**

## **15. Notice to California (USA) Residents Only**

Under California law, website and online service operators are required to disclose how they respond to web browser "do not track" signals or other similar mechanisms that provide consumers the ability to exercise choice regarding the collection of personal information about a consumer's online activities over time, to the extent the operator engages in that collection. We do not use or respond to Do Not Track (DNT) signals.

## **16. [For Citizens of EU Member States Only] Legal Processing Basis.**

As detailed above (see Section 1), we request your explicit consent in accordance with Art. 6 (1) (a) GDPR, for the following purposes:

- To ask us to send you more information about our services, or any other service providers that you may inquire about;

- To register an Account
- To request services from the Website.

You have the right to withdraw your consent at any time (see contact email address at Section 14 below).

As detailed above (see Section 1), we process your personal data based on the performance of a contract with you, in accordance with Art. 6 (1) (b) GDPR, for the following processing purposes:

- To provide account management services;
- To provide other services requested by you as described when we collect the information.

As detailed above (see Section 1), we rely on our legitimate interests to process your personal data, where your rights and freedoms do not outweigh these interests, in accordance with Art. 6 (1) (f) GDPR, for the following processing purposes:

- To provide and enable the use of our Website;
- To improve our Website and services and make technological and content enhancements to our Website;
- To process and fulfil orders placed by you;
- To contact you regarding your account or in relation to your queries, complaints or comments;
- To prevent or address service of technical problems;
- To prevent, detect, mitigate, and investigate fraud, security breaches or other potentially prohibited or illegal activities;

## **17. Questions, complaints or requests?**

Our Privacy Policy may change from time to time and all updates will be posted on this page.

If you have any question or complaint about your personal data or this privacy policy, you can email us at [privacy@bloomip.com](mailto:privacy@bloomip.com). Or you can write to the address below:

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