

1. Introduction

Dmitriy Kozlov PE is committed to protecting your privacy and ensuring you have a positive experience when using the services we provide, which we generally refer to as Hightouch or Hightouch services.

Scope of this Privacy Policy

This Privacy Policy explains how we handle data, including what we collect and how we obtain it, how we use it, when and if we disclose it, and some of your options for managing your data with Dmitriy Kozlov PE with regard to:

- the services we provide, which we generally refer to as Hightouch or Hightouch services
- our website <https://hightouch.ai>

Who are we and how to contact us?

This Privacy Policy explains how personal data is processed by Dmitriy Kozlov PE, a company incorporated in Armenia and having its registered office at Vanadzor, Khndzorut 4/16, Armenia.

The words “we”, “our”, “us” refer to Dmitriy Kozlov PE.

If you have questions, please contact the support team at support@hightouch.ai.

2. What data, for what purposes, how long, and based on what grounds do we process as a Controller?

Purpose of Processing	Data Subjects: Categories of Data	Storage Period	Legal Basis
to create a Hightouch account for you	Our potential customers and their representatives: email address; data from Google or Facebook account (user photo; user id; user name)	Until the termination of a contract or until the deletion of an account whichever happened earlier, and within the terms specified by law	processing is necessary for the performance of a contract to which you are party. We will not be able to provide you with our service if you fail to provide the data

to provide Hightouch service for you	Our customers and their representatives: last name and first name or nickname; secret keys; access tokens and statistics; email address; account data (user access level, balance, tariff plan)	Until the termination of a contract or until the deletion of an account whichever happened earlier, and within the terms specified by law	
to receive a payment from you	Our customers and their representatives: payment ID; payment data (card number; payment system; month and year; CVC code)		
to support users of our Facebook page	Facebook users: last name, first name; Facebook account; the message content	5 years from the date of the last request or until you object to such processing whichever happened first	our legitimate interests to improve the quality of our service
to collect your feedback about our service	Our customers and their representatives: name; email address; used language of the Hightouch admin panel		
to support you with various help queries received	Our potential customers, customers and their representatives: first and last name or nickname; email address; request subject; request content including the attached file, ticket number	Our potential customers: 5 years from the date of the last request or until you object to such processing whichever happened first	

		<p>Our customers and their representatives:</p> <p>Until the termination of a contract or until the deletion of an account whichever happened earlier, and within the terms specified by law.</p>	<p>processing is necessary for the performance of a contract to which you are party.</p> <p>We will not be able to provide you with our service if you fail to provide the data</p>
to send you direct email marketing communications about our service	<p>Our customers and their representatives or potential customers:</p> <p>email address; the time of opening emails; the message content</p>	<p>until you unsubscribe from our mailing list, until the end of campaign, or until the purpose of processing personal data is achieved whichever happened earlier</p>	<p>your consent to receive our newsletter</p> <p>You may withdraw your consent at any time by clicking the “unsubscribe” link in the email communications we send to you</p>
to better understand your preferences, to help you navigate our website, to personalize and provide a more convenient experience to you, to analyze which pages you visit, and to measure advertising and promotional effectiveness	<p>Our website visitors:</p> <p>IP-address, GEO (country or town), OS type and version, browser type and version, type of device and its display resolution, traffic source for the visitor, OS and browser language, which buttons are being clicked and what pages are being opened</p>	<p>2 years or until you withdraw your consent whichever happened earlier</p>	<p>your consent to store cookies in your browser</p> <p>You may withdraw your consent at any time by changing the settings of your web browser as set in our Cookie Policy</p>

As described more below, under the GDPR, Dmitriy Kozlov PE is a “Processor” of our customers’ end-customers and subscribers personal data that our customers may process via Hightouch.

Our customers are the “Controllers”. We follow their directions regarding this data, and may store it, delete it, or disclose it at their direction.

The data processing practices related to cases when we act as a processor and process on behalf of our customers are described in our Data Processing Agreement (DPA). You can review and digitally sign a copy of the DPA by emailing support@hightouch.ai. We will countersign it and provide you with a fully executed downloadable copy via email within 10 business days.

Specific categories of data which we process on our customers' behalf include:

With regard to end-customers and subscribers: name, family name (nickname); photo (user picture); the content of messages sent; the date and time of messages sent.

We process the data provided by our customers until the termination of our Terms of use with them and within the terms specified by applicable law.

3. Who do we share your data with?

We use third-party service providers to help us provide portions of the Dmitriy Kozlov PE services and give support. Examples of these third parties include our payment processor and hosting provider.

They only receive data needed to provide their services to us. We have agreements with our service providers that say they cannot use any of this data for their own purposes or for the purposes of another third party.

We prohibit our service providers from selling data they receive from us or receive on our behalf.

We require service providers to use data only in order to perform the services we have hired them to do (unless otherwise required by law). For example, we may use a company to help us provide client support. The information they may receive as part of providing that support cannot be used by them for anything else.

Acting as a Controller we share your data with the following processors:

Processors, their Location and the Link to Privacy Policy / Website if applicable	Purpose of Transfer
Facebook Inc. (the USA), Privacy Policy	Contextual Advertising Service Provider (Facebook Pixel)
Google LLC (the USA), Privacy Policy	Email Service Provider Web Analytics Service Provider (Google Analytics, Google Tag Manager)

360 Dialog (Germany), Privacy Policy	Official WhatsApp Business Solution Provider
Slack Technologies Inc. (the USA), Privacy Policy	Communication Service Provider
PayPro Global, Inc. (Canada), Privacy Policy	Online Payment Provider
Hetzner Online GmbH (Germany), Privacy Policy	Hosting Service Provider

Acting as a Processor we share the data provided by our Customers with the following sub-processors:

Purpose of sub-processing	Processors, their Location and the Link to Privacy Policy / Website if applicable	Safeguards for restricted transfers (outside the EEA and 'adequate' jurisdictions)
Hosting Service Provider	Hetzner Online GmbH (Germany), Privacy Policy	Adequate country

4. Cookie Policy

What is a cookie?

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

What do we use cookies for?

Dmitriy Kozlov PE uses cookies for the following purposes:

- to better understand your preferences,
- to help you navigate our website,
- to personalize and provide a more convenient experience to you,
- to analyze which pages you visit, and
- to measure advertising and promotional effectiveness.

Cookie List

- **Necessary cookies** help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.
- **Statistic cookies** help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.
- **Marketing cookies** are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third-party advertisers.
- **Unclassified cookies** are cookies that we are in the process of classifying, together with the providers of individual cookies.

What can you do if you do not want storing cookies to be set or want them to be removed?

You are able to withdraw the consent to store cookies by changing the settings of your web browser.

You may see the cookie management instructions published by the browsers vendors at [Google Chrome](#), [Safari \(Desktop, Mobile\)](#), [Firefox](#), [Internet Explorer](#) respectively.

Your rights

You have the following rights under the GDPR concerning personal data: the right to information, right to access, right to rectification, right to withdraw consent, right to object against processing for specific purposes (such as direct marketing), right to object to automated processing, right to be forgotten and right for data portability (copy of personal data in a commonly used machine-readable format).

You may also exercise the mentioned rights by contacting us via email at support@hightouch.ai.

You also have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work, or where an alleged infringement of the GDPR has taken place.

5. Changes to the current policy

We constantly update our policy in case of changes to the methods of processing your personal data.

You will receive a notification by email before any such changes come into effect (if you have provided us with your email address) or in a pop-up notification on our website.

6. Contact Us

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update “effective date” at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

If you have any questions about this Privacy Policy, please contact us (support@hightouch.ai).