

IndieFlow's Privacy Policy

Last Revised: March 31, 2020

IndieFlow Inc. (“**IndieFlow**”, “**we**” or “**us**”) respects the privacy of the users of its Services (as such terms is defined in our TOU), including visitors to our website available at www.indieflow.me (the “**Site**”), the users of our platform, provided on a Software-as-a-Service (SaaS) basis (the “**Platform**”) (collectively the “**User(s)**” or “**you**”) and is committed to protect the personal information that our Users share with us. We believe that you have a right to know our practices regarding the information we may collect and use when you visit and/or use our Site, Platform and/or when you use other Services we offer.

Capitalized terms which are not defined herein, shall have the meaning ascribed to them in our Terms of Use at www.indieflow.me/terms-of-use (“**TOU**”), into which this Privacy Policy is incorporated by reference.

1. Your Consent (PLEASE READ CAREFULLY!)

BY ENTERING, CONNECTING TO, ACCESSING OR USING THE SITE AND/OR PLATFORM AND/OR THE SERVICES WE OFFER, YOU AGREE TO THE TERMS AND CONDITIONS SET FORTH IN THIS PRIVACY POLICY (THE “**PRIVACY POLICY**”), INCLUDING TO THE COLLECTION AND PROCESSING OF YOUR PERSONAL INFORMATION (AS DEFINED BELOW). IF YOU DISAGREE TO ANY TERM PROVIDED HEREIN, YOU MAY NOT ACCESS OR USE THE SITE OR SERVICES.

FOR AVOIDANCE OF DOUBT, YOU HEREBY CONSENT TO THE COLLECTION, PROCESSING, TRANSFER AND USE OF YOUR PERSONAL INFORMATION. YOU ALSO ACKNOWLEDGE AND CONFIRM THAT YOU ARE NOT REQUIRED TO PROVIDE US WITH YOUR PERSONAL INFORMATION AND THAT SUCH INFORMATION IS *VOLUNTARILY* PROVIDED TO US.

2. Which information we may collect on our Users?

We may collect two types of data and information from our Users:

2.1 Non-identifiable and anonymous information (“**Non-personal Information**”). **We are not aware of the identity of the User from whom we have collected the Non-personal Information**. Non-Personal Information is any unconcealed information which does not enable identification of an individual User, and which is available to us while such User is entering and/or using the Site and/or Platform. You may access and browse the Site and Platform without disclosing personal information, although, like most websites and online services, we passively collect certain Non-Personal Information from your devices when you access and browse the Site or Platform, including: (i) technical information such as the type and version of your device and its operating system, the type of browser, screen resolution, device browser and keyboard language, Wi-Fi connectivity and the type and name of your device and/or browser, etc.; and (ii) behavioral information which may include the User’s click-stream on the Site and Platform, the activities of the User on the Site and Platform and additional information of a similar nature (collectively, “**Technical and Behavioral Information**”). We may also use third-party service providers such as Google Analytics to obtain detailed analytics on the device and the User’s behavior on the Site and Platform.

Please note that we or our third-party service providers will collect such Technical and Behavioral Information by using certain technologies such as Cookies (as further detailed under our Cookie Policy at indieflow.me/cookie-policy (“**Cookie Policy**”)).

2.2 Personally identifiable information (“**Personal Information**”). **This information may identify an individual or may be of a private and/or sensitive nature.**

- Personal Information is collected from the details Users provide during the registration process to the Platform, which may include the User’s full name and e-mail address. Additional information may be required from time to time in order to complete the registration process.
- We collect your email address when you register to our mailing list, either online or offline.
- Additional information may be collected and processed, such as Technical and Behavioral Information, including interactions with our online advertisements.
- Personal Information Users provide as part of any communications with IndieFlow, by any means, including through our social network pages, by approaching our customer services or during sales calls

(such information may include marketing and communication data that includes your preferences in receiving marketing from us and your communication preferences).

- We also obtain information from other sources, which include publicly-available sources, information provided by third parties which helps us determine your location based on your IP address and data providers, such as Google analytics and Facebook, from which we obtain demographic, interest based and online advertising related data.

2.3 Personal Information collected via technology:

- Geolocation data: while using the Site and Platform we will access, collect, process, monitor and/or remotely store “geolocation data”, including through the collection of IP addresses and other similar information to determine your location for analytics and security purposes.
- Technical and Behavioral Information: to the extent that the Technical and Behavioral Information detailed above under Section 2.1 will be linked to or associated with a specific individual then such information will be considered as Personal Information.
- Identifiers: we process certain online identifiers, such as Internet Protocol (IP) address, your Unique Device Identifier (UDID), or another unique identifiers, for geo-location, targeted advertising and security purposes. In addition, when using the Site and/or Platform, our authorized third-party service providers may collect User’s advertising identifiers, as further detailed in our Cookie Policy.
- We use third-party tracking services and usage logs, to track and analyze data from Users of the Site and Platform and for purposes of security and fraud prevention. We may also use cookies to gather information regarding your use of the Site and Platform and the information for which you searched and accessed (for more information please refer to our Cookie Policy).

2.4 Personal Information relating to job applicants:

- You may apply for a position at IndieFlow and send your CV to team@indieflow.me, and in such case the following applies:
 - As part of the submission of an application, you will be required to provide your full name, email address, website and phone number and attach your CV and a cover letter.
 - The Personal Information collected as part of the application process, including any Personal Information included in your CV, may be accessed by our HR department and/or by IndieFlow managers, worldwide, solely for the purposes of evaluation and to enable us to contact you with respect to the recruitment process.
 - If you submit an application on behalf of a third party, you hereby acknowledge that such third-party was made aware of this Privacy Policy and has granted his/her consent to the processing of his/her Personal Information by IndieFlow.
 - IndieFlow will retain Personal Information collected from applicants solely for the period that is necessary for the purposes set forth under this Privacy Policy or for the maximum statutory period in which a claim with respect to the recruitment process may be brought against IndieFlow.
 - Please note that if you have successfully recruited to work for IndieFlow, any Personal Information collected as part of the application process may be retained by IndieFlow for the purposes of your employment.

We do not collect any Personal Information from you or related to you without your approval, which is obtained, *inter alia*, through your active acceptance to the TOU and the Privacy Policy.

3. How Do We Collect Information on Our Users?

There are a few methods that we use:

- a. **We collect information through your entry and use of the Site and/or Platform and/or your access and use of our other Services, including interactions with our social networks pages.** In other words, when you are using our online Services, we are aware of it and may gather, collect and store the information relating to such usage, including Technical and Behavioral Information.
- b. **We collect information which you decide to provide us voluntarily, either online or offline.** For example, we collect Personal Information when you registered as a member of the Platform.

- c. **We collect information from third parties.** Such information may include mailing lists and other information available from public sources.

We may gather, collect and store such information either independently or through the help of our authorized third-party service providers as detailed below.

4. What are the Purposes of the Collection of Information?

Non-personal Information is collected in order to:

- Use it for statistical and research purposes and for customization and improvement of our Site and/or Platform and/or Services.
- Enhance the User's experience while using the Site and/or Platform.

Personal Information is collected in order to:

- Provide and personalize our Services to our Users;
- Add your contact details to our mailing list for the purposes of sending you information about our products and services by email and through web-browser and/or push notification. You have the right to opt-out of marketing messages at any time by following the instructions in such message or by contacting us at: TEAM@INDIEFLOW.ME;
- Display ads and send you offers. We may also use your Personal Information, including your purchase history, in delivering third party advertisements to you. This may include "targeted ads" based upon your interactions with our Services;
- Respond to your inquiries, requests, comments and suggestions;
- Provide the Users with commercial materials, updates about IndieFlow's new offerings, news regarding the Site, the Platform, our Services, etc.;
- Be able to contact Users for marketing and sales purposes;
- To conduct online surveys to better understand your needs, and how we can modernize, innovate and improve our products and services;
- Provide Users with updated information regarding our products and services;
- Determine general geolocation information (i.e., country) from which the User's computer is connected to the Internet in order for us to know the general location of our Site's Users as well as in order to safeguard our Site, Platform and other Services.
- Conduct internal operations, including troubleshooting, data analysis, testing, research and statistical purposes, including in order to improve our Services. Please note that in general we analyze aggregate data for such purposes, rather than specific user data, however we may need to analyze a specific case to address a specific problem;
- Comply with our legal obligations and in order to be able to protect our rights and legitimate interests;
- Email tracking – we may use tracking technology within the email we may send you in order to improve interactions with you and to better understand whether our emails were opened and read, and such tracking may include capturing the time and date in which you opened our email messages and the type of device you use to open such emails.

5. Sharing Information with Third Parties

IndieFlow will not share any Personal Information it collects with any third party, other than in the following circumstances: (a) to satisfy any applicable law, regulation, legal process, subpoena or governmental request; (b) to enforce this Privacy Policy and/or the TOU, including investigation of potential violations thereof; (c) to detect, prevent, or otherwise address fraud, security or technical issues; (d) to respond to claims that contact information (e.g. name, e-mail address, etc.) of a third-party has been posted or transmitted without their consent or as a form of harassment; (e) to protect the rights, property, or personal safety of IndieFlow, its Users or the general public; (f) by virtue of undergoing any change in control, including by means of merger, acquisition or purchase of all or substantially all of the assets of IndieFlow, so long as such acquirer maintains the same privacy terms hereunder; or (g) pursuant to your explicit approval prior to the disclosure.

Note, that we collect, hold and/or manage Personal Information through IndieFlow's authorized third parties vendors of certain products or services (such as, hosting cloud services) (including, as applicable, their affiliates) solely and limited to providing us with such requested services, and not for any other purposes. Such vendors may be located in a country that does not have the same data protection laws as your jurisdiction.

Advertising: we may share your data with advertising companies to display relevant ads to you. Unless you agree, we will not share your email address or any other contact details with such third parties. If you are in the United States, we may share information about you with select third parties so that they can communicate with you about products or services that may be of interest to you. If you prefer that we not share your information with such third parties, you may opt out by emailing us at team@indieflow.me.

For avoidance of doubt, IndieFlow may use **Non-personal Information** and transfer and disclose it to third parties at its discretion.

6. Deletion or Modification of Personal Information

In any event, if for any reason you (or any person) wish to delete or modify Personal Information, please send us an e-mail with adequate detail of your request to: team@indieflow.me and we will make reasonable efforts to modify or delete any such Personal Information pursuant to any applicable privacy laws. Note that unless otherwise explicitly specified herein and/or unless you instruct us otherwise we may retain your Personal Information for as long as reasonably required for the purposes of which such Personal Information was collected, all as permitted under any applicable privacy laws.

Aggregated and/or anonymous information derived from your use of the Services may remain on our servers indefinitely.

7. Minors

Use of our Services are intended for Users over the age of sixteen (16). Therefore, IndieFlow does not intend and does not knowingly collect Personal Information from children under this age. We reserve the right to request proof of age at any stage so that we can verify that minors under this age are not using our Services.

8. Security

We take reasonable measures to maintain the security and integrity of our Services and prevent unauthorized access to it or use thereof through generally accepted industry standard technologies and internal procedures. The Personal Information is hosted on AWS servers which provide advanced strict security standards (both physical and logical). In addition we employ highly secure services design and implementation using encryption and architectures mechanisms. Please note, however, that there are inherent risks in transmission of information over the Internet or other methods of electronic storage and we cannot guarantee that unauthorized access or use will never occur. INDIEFLOW SHALL NOT BE RESPONSIBLE OR LIABLE FOR UNAUTHORIZED ACCESS, HACKING, OR OTHER SECURITY INTRUSIONS OR FAILURE TO STORE OR THEFT, DELETION, CORRUPTION, DESTRUCTION, DAMAGE, OR LOSS OF ANY DATA OR INFORMATION.

9. Third Party Service Providers

While using our Services, we may be using third party service providers, who may collect, store and/or process the information detailed herein. IndieFlow uses commercially reasonable efforts to engage with third parties that post a privacy policy governing their collection, processing and use of non-personal and personal information. Such service providers may include without limitation:

- AWS, whose privacy policy can be found at: <https://aws.amazon.com/privacy/>;
- <https://www.fullstory.com/legal/privacy/>
- <https://mixpanel.com/legal/privacy-policy/>
- <https://policies.google.com/privacy>
- <https://legal.hubspot.com/privacy-policy>

Please read such third party service providers' terms of use and privacy policies to understand their privacy practices.

10. Links to Third Party Websites

Certain links provided in the Site and Platform permit Users to leave our Site and Platform and enter non-IndieFlow sites or services. Those linked sites and services are provided solely as a convenience to you. Those linked sites and services are not under the control of IndieFlow and it is not responsible for the availability of such external sites or services, and does not endorse and is not responsible or liable for any content advertising, products, services or other information on or available from such linked sites and

services or any link contained in a linked site or service. IndieFlow reserves the right to terminate any link at any time. You further acknowledge and agree that IndieFlow shall not be responsible or liable, directly or indirectly, for any damage or loss caused or alleged to be caused by or in connection with use of or reliance on any such content, goods or services available on or through any such linked sites or resource. Most of such linked sites and services provide legal documents, including terms of use and privacy policies, governing the use thereof. It is always advisable to read such documents carefully before using those sites and services, *inter alia*, in order to know what kind of information they are collecting.

11. International Data Transfer

In order to provide our Services, we may transfer information collected about you, including Personal Information, to other third party service providers (as detailed herein) across borders and from your country or jurisdiction to other countries or jurisdictions around the world. Please note that we may transfer such information to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and you consent to such transfer of information.

12. Direct Marketing

You hereby agree that we may use your contact details you provided us with (including, without limitation, e-mail address and phone number) for the purpose of providing you commercial and/or non-commercial materials related to our current and/or future products and services. You may withdraw your consent by sending a written notice to the following email address: team@indieflow.me or alternatively follow the instructions for removing yourself from the mailing list which are available in the message transmitted to you.

13. Data Retention

IndieFlow will retain the Personal Information for as long as we are comfortable that it is accurate and can be relied upon. Personal Information which is no longer required for the purpose for which it was initially collected will be deleted unless we have a valid justification to retain it which is permitted under applicable law, such as to resolve disputes or comply with our legal obligations.

14. Changes to the Privacy Policy

The terms of this Privacy Policy will govern the use of the Site and any information collected therein and/or provided to us voluntary. IndieFlow reserves the right to change this policy at any time, so please re-visit this page frequently. We will provide notice of substantial changes of this policy on the homepage of the Site and/or we will send you an e-mail regarding such changes to the e-mail address that you may have provided us with. Such substantial changes will take effect seven (7) days after such notice was provided on our Site or sent by e-mail, whichever is the earlier. Otherwise, all other changes to this Privacy Policy are effective as of the stated "Last Revised" date and your continued use of the Site after the Last Revised date will constitute acceptance of, and agreement to be bound by, those changes. In the event that the Terms should be amended to comply with any legal requirements, the amendments may take effect immediately, or as required by law and without any prior notice.

15. Got any Questions?

If you have any questions (or comments) concerning this Privacy Policy, you are most welcome to send us an email to the following address: team@indieflow.me.