# deephow

# Data Privacy Policy

Version 2.0

#### **Executive Summary**

This policy explains the practices of DeepHow for collecting, storing, and distribution of data. DeepHow takes privacy and information security seriously. We are committed to a fair and transparent process of data collection and usage. This Data Privacy Policy provides a description of how our customers are protected and how their data are used by us to provide our services to them. By visiting, downloading or registering our application, or by using our service, regardless of the manner or device made available and supported by us through which you choose to do so, you are agreeing to our Privacy Policy, outlined below.

Date Approved: January 2019 Last Updated: January 2020

Next review Date: January 2021 (Annually)

**Policy Author:** Chief Engineer, VP Customer Success and Innovation & Senior

Cybersecurity Engineer

#### **Exception**

DeepHow may disclose your Personal Information to a third party without your consent if we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other application users or anyone else that could be harmed by such activities. We may disclose Personal Information when we believe in good faith that such disclosure is required by and in accordance with the law.

#### **Personal Information**

In this Privacy Policy, the words 'personal information' are used to describe the following: your name, mailing address, phone number, e-mail address and demographic and other personally identifiable information about you as an individual. As a user of our application, the words will also include business information that you contribute which concerns business and personal relationships between yourself and other individuals and organizations.

The information mentioned above may be provided when:

- There is a communication between you and us (including by phone, email, chat, Website or otherwise);
- 2. you register for an account;
- 3. you order or inquire about Services;
- 4. you sign up for our newsletter or other materials; and
- 5. when you report a problem with our Website or Services

#### **Reasons for Collecting Your Information**

Personal Information about you are collected so that we can:

- establish your identity;
- 2. provide to you the services offered by the application and bill any amounts due from you;
- troubleshoot and resolve problems;
- 4. improve the usability, performance and effectiveness of our services and business:
- 5. provide you with news, updates, and reminders related to our services;
- 6. enforce our 'Terms of Service';
- protect you and us from error and fraud;
- 8. understand your needs and eligibility for products and services;
- comply with legal and regulatory requirements;
- 10. and as otherwise described to you at the time of collection.

We may also collect, process, store and analyze anonymous information about you, this could be obtained from your browser or through the use of "cookies" or other tools that track, measure and analyze the behaviors and usage patterns of visitors to our application and users of our services. We may use third party tracking services to track and analyze such anonymous information from users of our service, and such third parties may use cookies to help track any of our user's behavior. The location of the user when using DeepHow app may also be collected.

We may send you communications via email about our service. You can opt out of receiving communications from us by changing your notification settings on our application. Please note that even if you unsubscribe or opt-out, we may still send you urgent service-related communications (e.g., if your credit card payment was declined). If you do not wish to receive them, you must delete your account with us.

#### The Usage of the Collected Personal Information

Your personal information may be used by us, our employees, service providers, and disclosed to third parties for the following purposes. For each of these purposes, the following legal basis on which your personal information is used are set:

- 1. To communicate with you and other individuals for our legitimate business purposes (i.e., the provision of the application and our services).
- 2. To provide you with our application and the services for legitimate business purposes, and depending on the circumstances, to perform a contract between you and us
- 3. To notify you about changes to the application or the services
- 4. To audit and monitor the use of the application
- 5. To improve the quality of the application and the services
- 6. To manage complaints, feedback and queries
- 7. To carry out market research and analysis
- 8. To carry out satisfaction surveys and analysis

- 9. To provide you with information about the services we offer (including details of any products which we believe may be of interest to you) in accordance with your preferences as indicated when you entered into any agreement with us, including any marketing consent preferences.
- 10. To comply with any legal or regulatory obligations (including in connection with a court order).
- 11. To enforce or apply the agreements concerning you (including agreements between you and us)

#### **DeepHow Security Policy**

DeepHow uses commercially reasonable efforts to ensure that Personal Information is secure, including https protocol and encryption. In order to prevent unauthorized access or disclosure, DeepHow has put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect, as well as the modes of access to it. We always strive to protect your Personal Information, but we cannot warrant the security of any information you transmit to us. More information about security is available in our Terms of Service.

Every user of DeepHow services has an account on our platform.

## Accessing, Correcting and Updating Your Personal Information

The Personal Information of all our subscribers are available to them through their account. To review and update your Personal Information to ensure it is accurate, you may login into your account to make the changes, or you may contact us through our official channel or Website. If we are unable to provide access or disclose information to you, we will explain why, subject to any legal or regulatory restrictions.

If you want to delete your account, you may inform us officially. All Personal Information linked to your account will be deleted at your request as soon as reasonably possible in accordance with the law. When such a request to delete your account is made, your data will be deleted from our production servers, and you will no longer be able to access your account. However, we may retain your Personal Information to comply with laws,

prevent fraud, resolve disputes, troubleshoot problems, assist with any investigations, enforce our terms of service, and take other actions otherwise permitted by law. It is also to be noted that your information that has been shared with third parties is no longer accessible by us and we cannot guarantee its deletion or modification.

#### How DeepHow Protect Your Personal Information

To help protect your personal information from unauthorized access, use, disclosure and transfer, DeepHow implemented a variety of technical and organizational measures. Unfortunately, the transmission of information via the internet is not completely secure. While we always do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to the Application and any transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to try to prevent unauthorized access.

#### How Long Will DeepHow Keep Your Personal Information

DeepHow will retain your personal information for as long as is necessary for purposes for which it was collected. The precise period will depend on the reason why it was collected. Those periods are also based on the requirements of applicable data protection laws, applicable legal and regulatory requirements and periods relating to the commencement of legal actions.

#### DeepHow Notification of Changes to this Privacy Rule

There may be reason for us to update this Privacy Policy and data management practices at any time. Any changes we make to this Privacy Policy in the future will be posted on this page. You will be notified of such changes by email (sent to the e-mail address specified in your account) or by means of a notice on this DeepHow Application prior to the change becoming effective. The updated Privacy Policy will take effect as soon as it has been updated or otherwise communicated to you.

### **Contact for Comments and Questions**

Your comments and questions regarding this Privacy Policy and the use of your Personal Information are important to us. If you have questions, concerns or if you would like more detailed information please contact us by:

Email: <a href="mailto:support@deephow.com">support@deephow.com</a>

Mail: 19 Clifford Street, Detroit, Michigan, 48226, United States.