

Refundly Shopify Privacy Policy

Effective Date: March 10, 2026

Last Updated: March 10, 2026

This Refundly Shopify Privacy Policy (“**Privacy Policy**”) describes how **Oshri Inc., doing business as Refundly** (“**Refundly**,” “**we**,” “**us**,” or “**our**”) collects, uses, discloses, stores, and protects personal information in connection with the Refundly Shopify application, merchant dashboard, storefront widget, customer portal, and related services (collectively, the “**Service**”).

This Privacy Policy is designed for the Refundly Shopify app and related merchant and customer-facing experiences. It applies to:

1. merchants and their personnel who install or use the Service;
2. shoppers, customers, or other end users who interact with a Merchant’s Refundly widget or portal; and
3. visitors who contact us or interact with our Service-related websites or support channels.

1. Important Role Information

Refundly may act in different privacy roles depending on the context:

A. When we process Merchant account and business contact data

Refundly generally acts as the controller, business, or equivalent under applicable privacy law for information relating to our own business relationship with the Merchant, such as account registration, billing, support, security, and legal compliance.

B. When we process Merchant customer, order, return, and refund data to provide the Service

Refundly generally acts as a processor, service provider, or equivalent on behalf of the Merchant. In those cases, the Merchant controls how customer personal information is collected and used for the Merchant’s store, and the Merchant’s own privacy policy also applies.

C. When end users interact directly with Refundly-hosted experiences

Where an End User creates a Refundly account, authenticates directly with us, contacts us for support, or otherwise engages with Refundly directly, Refundly may act as a controller for certain limited processing related to account administration, support, security, abuse prevention, and legal compliance.

If you are a shopper or other End User and have questions about a Merchant’s store policies or how the Merchant handles your information, you should also review that Merchant’s privacy policy and terms.

2. Information We Collect

We collect the categories of information described below.

A. Information collected through Shopify and connected systems

Depending on the scopes and integrations enabled by the Merchant, we may collect information from Shopify and connected systems such as:

1. store name, store URL, shop ID, store settings, and app installation information;
2. merchant account owner and staff contact details;
3. order information, order numbers, line items, product details, prices, discounts, order status, shipment and fulfillment data;
4. return, exchange, refund, store credit, and claim-related data;
5. customer identifiers and contact information such as name, email address, phone number, shipping address, and billing address, if made available and necessary for the Service;
6. communications metadata and event history relevant to returns and refunds; and
7. store, app, and event logs.

B. Information collected directly from Merchants

We may collect information Merchants provide directly to us, including:

1. account registration details;
2. billing and payment information;
3. support requests, messages, and attachments;
4. business preferences, policies, workflows, and settings configured in the Service;
5. marketing preferences; and
6. any information submitted during onboarding, demos, forms, surveys, or correspondence.

C. Information collected directly from Merchant customers and End Users

When shoppers or End Users interact with the widget, portal, or other customer-facing features, we may collect:

1. account login credentials or authentication information;
2. name, email address, phone number, order number, postal code, or other verification details;
3. return or refund request details, reasons, uploaded images, messages, and supporting materials;
4. communications with Refundly or with the Merchant through the Service;
5. preferences and settings;
6. customer service history; and
7. any other information the End User chooses to provide.

D. Device, usage, and technical information

We may automatically collect:

1. IP address;
2. browser type and version;
3. device identifiers and operating system;
4. approximate geolocation derived from IP address;
5. referring URLs, page views, clicks, timestamps, and session information;
6. app performance and diagnostic data;
7. cookie, local storage, and similar technology data; and
8. fraud, abuse, and security signals.

E. Information from third parties

We may receive information from:

1. Shopify;
2. payment, messaging, analytics, hosting, support, or security providers;
3. carriers, logistics providers, or ecommerce partners connected by the Merchant;
4. advertising or marketing platforms used for Merchant-facing marketing; and
5. public sources where permitted by law.

3. How We Use Personal Information

We use personal information for the following purposes:

1. to provide, operate, authenticate, host, and maintain the Service;
2. to enable Merchants and End Users to track, manage, and communicate about returns and refunds;
3. to create and administer accounts;
4. to process installations, billing, subscriptions, and payments;
5. to provide customer support and respond to inquiries;
6. to send service-related messages, confirmations, updates, and security notices;
7. to monitor performance, troubleshoot issues, and improve the Service;
8. to personalize user experience and store or account settings;
9. to detect, investigate, prevent, and address fraud, abuse, security incidents, and violations of our Terms;
10. to comply with contractual obligations, legal requirements, court orders, and regulatory requests;
11. to enforce our Terms and protect the rights, property, and safety of Refundly, Merchants, End Users, and others;
12. to generate aggregated or de-identified analytics and reporting; and
13. where permitted by law, to send Merchant-facing marketing or promotional communications.

We do not sell Merchant Customer Data. We do not use Merchant Customer Data collected through the Service for third-party advertising or cross-context behavioral advertising.

4. Cookies and Similar Technologies

We and our service providers may use cookies, local storage, pixels, software development kits, and similar technologies on the merchant-facing and customer-facing portions of the Service to:

1. keep users signed in;
2. remember preferences and settings;
3. maintain security;
4. understand usage and performance;
5. diagnose errors; and
6. improve the Service.

Where required by law, we will rely on an appropriate consent mechanism or honor applicable opt-out signals. Merchants are responsible for providing any storefront-level notices or obtaining any consents required for technologies they deploy through their own websites or storefronts.

You can usually manage cookies through your browser or device settings, although disabling certain cookies may affect functionality.

5. Legal Bases for Processing

Where applicable law requires a legal basis, Refundly processes personal information on one or more of the following bases:

1. performance of a contract;
2. compliance with legal obligations;
3. our legitimate interests, such as operating, securing, improving, and supporting the Service; and
4. consent, where required by law.

When Refundly processes Merchant Customer Data on behalf of a Merchant, the Merchant is responsible for ensuring it has an appropriate lawful basis for that processing.

6. How We Disclose Personal Information

We may disclose personal information to the following categories of recipients:

1. **Service providers and subprocessors** that help us operate the Service, such as cloud hosting, infrastructure, analytics, communications, payment, customer support, security, and monitoring providers;
2. **Shopify and connected platforms** as necessary to provide the Service and maintain integrations;
3. **Merchants**, where information relates to their stores, customers, returns, or support requests;
4. **Professional advisors**, such as lawyers, accountants, insurers, and auditors;

5. **Corporate transaction counterparties**, where disclosure is reasonably necessary in connection with a merger, acquisition, financing, restructuring, or sale of assets;
6. **Law enforcement, regulators, courts, and government authorities**, where required by law or necessary to protect rights, safety, and security; and
7. **Other parties with your direction or consent.**

We may also disclose aggregated, anonymized, or de-identified information that does not identify individuals.

7. International Data Transfers

Refundly may process and store personal information in the United States and other countries where we or our service providers operate.

Where required by law, we use appropriate safeguards for cross-border transfers, such as contractual protections or other lawful transfer mechanisms.

8. Data Retention

We retain personal information for as long as reasonably necessary for the purposes described in this Privacy Policy, including to:

1. provide the Service;
2. maintain the business relationship with the Merchant;
3. support and secure the Service;
4. comply with legal, tax, accounting, and regulatory obligations;
5. resolve disputes; and
6. enforce our agreements.

In general:

1. Merchant account and billing records are retained for the duration of the relationship and a reasonable period thereafter;
2. Merchant Customer Data is retained according to the Merchant's instructions, Shopify compliance requirements, our internal retention practices, and applicable law;
3. support records and logs may be retained for a limited period for security, troubleshooting, and legal purposes; and
4. backups may persist for a limited additional period before deletion or overwriting.

When we no longer need personal information, we will delete it, de-identify it, or securely isolate it, unless retention is required by law.

9. Shopify Privacy Law Compliance

If the Refundly Shopify app is distributed through the Shopify App Store, Refundly supports the Shopify privacy compliance workflows required for public apps, including requests relating to

stored customer data and deletion requests. Shopify requires App Store apps to subscribe to the customers/data_request, customers/redact, and shop/redact compliance webhooks, and Shopify sends shop/redact after uninstall so store data can be erased.

If we receive a request through Shopify or from a Merchant relating to Merchant Customer Data, we will respond in accordance with our role, the Merchant's instructions, Shopify requirements, and applicable law.

10. Your Privacy Rights and Choices

Depending on where you live and the nature of our relationship with you, you may have rights to:

1. access personal information;
2. correct inaccurate personal information;
3. request deletion;
4. object to or restrict certain processing;
5. receive a portable copy of certain information;
6. withdraw consent where processing is based on consent; and
7. opt out of marketing communications.

For Merchants and Merchant personnel

You may contact us directly using the information in Section 15.

For shoppers and other End Users

If your request relates to information processed by Refundly on behalf of a Merchant, please contact the Merchant first, because the Merchant is usually the party responsible for that data. We will assist the Merchant as required by law and our contractual obligations.

You will not be discriminated against for exercising applicable privacy rights.

11. Marketing Communications

We may send Merchants and business contacts promotional or informational messages about Refundly where permitted by law. You can opt out at any time by using the unsubscribe mechanism in the message or contacting us.

We do not use Merchant Customer Data obtained through the Service to send third-party advertising.

12. Security

We use reasonable administrative, technical, and physical safeguards designed to protect personal information against unauthorized access, loss, misuse, alteration, and disclosure.

No method of transmission over the internet or electronic storage is completely secure, so we cannot guarantee absolute security.

Users are responsible for protecting their account credentials and notifying us promptly of any suspected unauthorized use.

13. Children's Privacy

The Service is not directed to children under 13, and we do not knowingly collect personal information directly from children under 13 through the Service without appropriate authorization. If you believe a child has provided us personal information in violation of applicable law, contact us so we can review and take appropriate action.

14. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. If we make material changes, we will post the updated version, revise the "Last Updated" date, and may provide additional notice where required by law.

Your continued use of the Service after the effective date of the updated Privacy Policy means the updated Privacy Policy will apply, to the extent permitted by law.

15. Contact Us

For questions, requests, or complaints about this Privacy Policy or our privacy practices, contact:

Oshri Inc. dba Refundly

Email: hello@refundlyapp.com