

Promise Network

Privacy Policy

Last Updated on May 1, 2021

Your privacy is important to us. This Privacy Policy (“**Policy**”) applies to services provided by Promise Network Inc. (“**we**”, “**us**”, or “**Company**”) and our website, product pages, mobile or web applications, or other digital products that link to or reference this Policy (collectively, the “**Services**”) and explains what information we collect from users of our Services (a “**user**”, “**you**”, or “**your**”), including information that may be used to personally identify you (“**Personal Information**”) and how we use it. We encourage you to read the details below. This Policy applies to any user of or visitor to our Services.

We reserve the right to change this Policy at any time. We will notify you of any changes to this Policy by posting a new Policy to this page, and/or by sending notice to the primary email address specified in your account. You are advised to review this Policy periodically for any changes. Changes to this Policy are effective when they are posted on this page. You acknowledge that your continued use of our Services after we publish or send a notice about our changes to this Policy means that the collection, use and sharing of your Personal Information is subject to the updated Policy.

Scope and Applicability

The Policy applies to your information when you visit our website or otherwise use the Services. We will only collect and process information where we have lawful bases. With respect to the information described in this Policy, lawful bases include consent (where you have given consent), contract (where processing is necessary for the performance of a contract with you (e.g. to deliver the Services you have requested)), and, in some instances, for “legitimate interests” in the applicable jurisdiction.

This Policy does not apply to websites, apps, products, or services that we do not own or control, including the websites, apps, products, and/or services of our Customers (defined below). This means that this Policy does not explain what our Customers do with your information that we provide to them (or any information they collect directly from you, their End User (defined below)). Information provided by or to third parties, such as our Customers, are controlled by their respective privacy policies, which we encourage you to review for more information about their practices.

What Information Do We Collect?

When you use the Services or otherwise communicate with us, we collect information that you provide to us directly. For example, we collect information in the following circumstances: you (i) use or visit the Services, (ii) register for the Services or create an account or profile or accept the creation of an account or profile on your behalf (an “Account”), (iii) subscribe to newsletters; (iv) purchase a product or service on the Services; (v) request technical support; (vi) otherwise use the Service where Personal Information is required for such use and/or participation, and (viii) when you contact us via the Services or when you otherwise communicate with us. You can choose not to provide information that is requested of you by us; however, this may limit your ability to use or access the Services.

The information you provide to us directly may include, without limitation, the following information that may, alone or in combination with other data, constitute Personal Information:

- Your name, email address, and/or phone number (“Account Information”).
- Your account number, date of birth, or other information we may request for identity verification purposes.
- Your responses to surveys that we may ask you to complete for research purposes or to help direct Company activities.

- Details of any financial transactions you participate in on the Services, including the amount, currency, and method of payment.
- Information you provide in order to subscribe to our marketing communications.
- Information you provide when communicating with us or that you otherwise voluntarily provide to us.

Furthermore, we may automatically collect in and through the Services the following “Technical Data”:

- Device data: including, but not limited to, the type of device you use, data on device advertising ID’s and similar hardware qualifiers, the browser you use, your operating system, and approximate geographic location data.
- Usage data: including, but not limited to, search terms entered, pages viewed, and other usage behavior identified by analytics events.
- Network and internet information: including, but not limited to, URLs, Internet Protocol addresses, bounce rates, use of spoofing, active (TCP/IP) ports, number of sessions initiated, click streams, location information and network/Wi-Fi access points.
- Information we collect on the use of the Services via cookies and other tracking technologies: please see the “How Do We Use Tracking Technologies” section below for more information.

We may also collect or receive information about you from governmental records and other third party sources, such as agencies to which you are required to make payments.

If you are using our services as a customer (“Customer”), we may process Personal Information in the course of our business relationship with you, which may include Account Information of you or your representatives, as well as any Personal Information provided to us by you or your authorized end users (“End Users”) in connection with the Services, as described above in this Policy (collectively referred to as “Customer Data”). Any Customer Data is controlled by the respective privacy policy of the Customer. For End Users, we encourage you to review the privacy policies and/or notices of the Customer for more information about their privacy practices.

How Do We Use The Information We Collect?

We use the information we collect to:

- Deliver and improve the Services and your overall user experience.
- To protect, investigate, and deter against fraudulent, unauthorized, or illegal activity.
- To link or combine your Personal Information with other information.
- To compare and verify information for accuracy and update our records.
- Email, text, message, or otherwise contact you with information and updates about us and the Services
- To respond to your comments and questions and provide customer service.
- To send you information including confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages.
- Analyze how you use the Services with tools such as Google Analytics, Segment, and other tools to help us understand traffic patterns and know if there are problems with the Services.
- In connection with a merger, acquisition, reorganization or similar transaction.
- When required by law or to respond to legal process.
- To protect our users, other individual lives, and/or the rights or property of Company.
- To maintain the security of the Services.
- For any other purpose with your consent.

Do We Share Your Personal Information?

In addition to the specific situations discussed elsewhere in this privacy policy, we disclose personal information in the following circumstances:

- With our corporate affiliates.
- With third parties that perform services to support our core business functions and internal operations, which may include database administrators, communication services, cloud computing services, payment processors, advertising services, and application services providers. The foregoing service providers may include:
 - Twilio
 - TalkDesk
 - Kustomer
 - Close
 - Aircall
 - Stripe
- To support our audit, compliance, and corporate governance functions.
- In connection with a change of ownership or control of all or part of our business (such as a merger, acquisition, reorganization, or bankruptcy).
- If we have a good-faith belief that access, use, preservation, or disclosure of such information is reasonably necessary to detect or protect against fraud or security issues.
- If required or permitted by applicable law or regulation, including laws and regulations of the United States and other countries, or in the good faith belief that such action is necessary to: (a) comply with a legal obligation or in response to a request from law enforcement or other public authorities wherever Company may do business; (b) protect and defend the rights or property of Company; (c) act in urgent circumstances to protect the personal safety of users, customers, and contractors/employees of Company or others; or (d) enforce our Terms of Service or otherwise protect against any legal liability.
- With your consent or at your direction.

How Do We Use Tracking Technologies?

Some of the features on the Services may require the use of “cookies” - small text files that are stored on your device’s hard drive. You may delete and block all cookies from our Services, but parts of the Services may not work. We want to be open about our cookie use. The following sets out how we may use different categories of cookies and your options for managing cookie settings:

Type of Cookies	Description	Managing Settings
<p>Required cookies</p>	<p>Required cookies enable you to navigate the Services and use their features, such as accessing secure areas of the Services. If you have chosen to identify yourself to us, we use cookies containing encrypted information to allow us to uniquely identify you. These cookies allow us to uniquely identify you when you are logged into the Services and to process your online transactions and requests.</p>	<p>Because required cookies are essential to operate the Services, there is no option to opt out of these cookies.</p>

<p>Performance cookies</p>	<p>These cookies collect information about how you use our Services, including which pages you go to most often and if they receive error messages from certain pages. These cookies do not collect information that individually identify you. Information is only used to improve how the Services functions and performs. From time-to-time, we may engage third parties to track and analyze usage and volume statistical information relating to individuals who visit the Services. We may also utilize Flash cookies for these purposes.</p>	<p>To learn how to opt out of performance cookies using your browser settings, click here. To learn how to manage privacy and storage settings for Flash cookies, click here.</p>
<p>Functionality cookies</p>	<p>Functionality cookies allow our Services to remember information you have entered or choices you make and provide enhanced, more personal features. These cookies also enable you to optimize your use of the Services after logging in. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customize. We may use local shared objects, also known as Flash cookies, to store your preferences or display content based upon what you view on the Services to personalize your visit.</p>	<p>To learn how to opt out of functionality cookies using your browser settings, click here. To learn how to manage privacy and storage settings for Flash cookies, click here.</p>

Our third party analytics services providers may use cookies and other tracking technologies to collect and store data Technical Information to be used for the purposes outlined in this Privacy Policy.

We may also use session replay technologies, such as FullStory, Inc., to collect information regarding visitor behavior on the Service. For more information about FullStory, please see the FullStory privacy policy available at <https://www.fullstory.com/legal/privacy/>. You can opt out of FullStory’s collection and processing of data generated by your use of the Services by going to <https://www.fullstory.com/optout/>

How Do We Secure Your Personal Information?

We take reasonable steps to protect your Personal Information against unauthorized access, alteration, disclosure, misuse, or destruction. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. The safety and security of your Personal Information also depends on you. If you have an account with us, you are responsible for keeping your membership details confidential. Your account is protected by your account password and we urge you to take steps to keep your Personal Information safe by not disclosing your password and by logging out of your account after each use. We further protect your Personal Information from potential security breaches by implementing certain technological security measures including encryption, firewalls and secure socket layer technology. However, these measures do not guarantee that your Personal Information will not be accessed, disclosed, altered or destroyed by breach of such firewalls and secure server software. By using the Services, you acknowledge that you understand and agree to assume these risks.

Data Retention

We also retain your personal data while your account is in existence or as needed to provide the Services to you, or if you are an End User, to our Customer. This includes data you or others provided to us and data generated or inferred from your use of the Services.

Managing Your Privacy

All users may review, update, correct or delete the Personal Information furnished by a user in their user account by contacting us at legal@joinpromise.com or by accessing your user account. For your protection, we may only share and update the Personal Information associated with the specific email address that you use to send us your request, and we may need to verify your identity before doing so. We will try to comply with such requests in a reasonably timely manner. If you completely and permanently delete all of your Personal Information, then your user account may become deactivated and/or it may lead to the cancellation or cessation of Services to your account, including without limitation any payment plan you are currently enrolled in via the Services. If you wish to cancel your account, you may do so through your account page, and any personally identifiable information associated with your account will be deleted as soon as is reasonably practical or as required by applicable law. Please note that we may retain information that is otherwise deleted in anonymized and aggregated form, in archived or backup copies as required pursuant to records retention obligations, or otherwise as required by law. We may retain an archived copy of your records as required by law or for legitimate business purposes.

We may use some of the information we collect for marketing purposes, including to send you promotional communications about new Company features, products, events, or other opportunities. If you wish to stop receiving these communications or to opt out of use of your information for these purposes, please follow the opt-out instructions, such as clicking "Unsubscribe" (or similar opt-out language) in those communications. For text message communications, you can text back "STOP" and we will send you a text message to confirm that you have been unsubscribed. You can also contact us at legal@joinpromise.com to opt out. Despite your indicated email preferences, we may send you service related communications, including notices of any updates to our terms of service or privacy policy.

Links to Third Party Websites

We may provide links to other websites. We have no control over these websites and they are subject to their own terms of use and privacy policies. As such, we do not endorse and are not responsible for the availability of, or for any content, advertising, products, or other materials on or available from, these third party websites.

By using the Services, you agree that we will not be liable for any damage or loss caused by your use of or reliance on any content, advertising, products, or other materials on or available from these third party websites.

How We Respond to Do Not Track Signals

Your browser settings may allow you to automatically transmit a Do Not Track signal to websites and other online services you visit. We do not alter our practices when we receive a Do Not Track signal from a visitor's browser because we do not track our visitors to provide targeted advertising. To find out more about Do Not Track, please visit <http://www.allaboutdnt.com>.

Children Under 16

The Services are not directed to individuals who are under age of sixteen (16) and we do not solicit nor knowingly collect Personal Information from children under the age of sixteen (16). If you believe that we have unknowingly collected any Personal Information from someone under the age of sixteen (16), please contact us immediately at legal@joinpromise.com and the information will be deleted.

A Note to Users Outside the United States

Our Company is based in the United States. The Services are controlled and operated by us from the United States and are not intended to subject us to the laws or jurisdiction of any state, country or territory other than that of the United States. Your Personal Information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using the Services you consent to the transfer of information to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your Personal Information.

Contact Us

If you have any questions about this Policy, your Personal Information, or the Services, you can contact legal@joinpromise.com.