

INTIS TELECOM'S PRIVACY POLICY

This Privacy Policy governs the manner in which INTIS TELECOM collects, uses, maintains, deletes and discloses information collected from users of the INTIS TELECOM platform (the "Platform"). This Privacy Policy applies to the Platform and all services offered by the intistele.com website (together with its sub-domains, content and services, the "Site").

1. Introduction

We have implemented this Privacy Policy because your privacy, the privacy of other users of the Platform, and the privacy of their clients is important to us. This Privacy Policy explains our online information practices and the choices you can make about the way your personal information and personal information of your clients is collected and used in connection with the Platform services.

2. Information we collect directly from you

When you use the Platform, we collect information relating to you and your use of our services from a variety of sources. These are listed below. The sections afterward describe what we do with this information.

- **Registration Information.** You need an INTIS TELECOM account to send text messages from the Platform. When you register the account, we collect your username, password, email address, your name, your last name and the country you are located in.
- **Verification Information.** For security purposes, we need to verify your account, i.e. make sure that you have provided us with your personal data, and not the data of the other person. To verify the account, we require your full name and your phone number (along with the destinations you are interested in, your approximate volumes of text messages and the nature of the text messages you are going to send in order to make the appropriate settings). We also request links to your Facebook, Twitter, LinkedIn accounts and your website, however, this information is not obligatory, and you may not provide it.
- **Billing information.** If you make a payment to INTIS TELECOM, you can do this via one of the payment processors (PayPal, Paysera, Strip etc.) we work with. The payment processor will be liable for your payment and data processing. Please make sure you have read and agreed to their terms of use.

We can also issue an invoice for you or your company on your request. Make your requests to payments@intistele.com or to our support via the ticket system in the account (the "life belt" icon on the top panel). To do this, we will require your company financial information (company name, its registration number, VAT, address, and the bank account number) or your private information such as full name, national identification number, and address.

- **Account Settings.** You can set certain preferences on your account settings page. For example, your default language, time zone and communication preferences (opting in or out of receiving text messaging reports or any emails regarding the Platform services and functioning, e.g. price change notifications, low balance alerts and Platform maintenance notifications).
- **Your Clients Data.** To send text messages you need to upload a list of the recipients containing their phone numbers. This may contain other information such as name, last name,

date of birth, gender and other personal data. Please make sure you have the subscribers consent to receive text messages from you and to allow you to collect and process their personal data. You must also allow your clients to opt out of your mail-outs at any time. Please use the blacklist option for those who desire to opt out of your messages.

We cannot be liable for your list of subscribers and check if subscribers have given their consent, neither can we add or delete any information from this list, however, we are committed to handling your personal information and your clients' data with integrity and care; we provide security for your clients' data processing and storing.

We don't share or abuse your clients' phone numbers. Rest assured, INTIS TELECOM will not contact people in your subscriber list expect at your direction. We definitely won't sell these phone numbers and other details to any third party.

3. Information we collect about you indirectly or passively when you interact with us

- **Usage data.** We collect usage data about you whenever you interact with our services. This includes log files that record data each time a device accesses the account or performs any other action on the account. This data contains originating IP addresses and timestamps.
- **Text Messaging Details.** We also store the details of text messages that you sent from the Platform during 90 (ninety) calendar days. This data includes phone number and the mobile operator it belongs to, timestamps, text, sender ID, the price of the message and its status. However, during this 90-day period, the data can be deleted at any time upon your request.
- **Referral data.** If you arrive at the Site from an external source (such as a link on another website or in an email), we record information about the source that referred you to us.

4. How do we use your data

We use information that we collect about you or that you provide to us, including any personal information:

- to provide you with information and services that you requested from us;
- to fulfill any other purpose for which you provide it;
- to provide you with notices about your subscription to our services, including expiration and renewal notices;
- to notify you about price changes and any other changes of the services we provide to you;
- to inform you about low account balances, maintenance work on the Platform or any outages occurring on the Platform or in mobile operators' networks;
- to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;
- in any other way we may describe when you provide the information;
- for any other purpose with your consent.

We never sell your personal information or provide it to others for marketing purposes.

5. How do we protect your information

We implement a variety of security measures to maintain the safety of your personal information when you enter, submit, or access your personal information. We offer the use of a secure server. All information supplied is transmitted via Secure Socket Layer (SSL) technology and then encrypted into our payment gateway providers database to be accessible only by those with special access rights to such systems. All authorised parties are required to keep the information confidential.

6. Do we disclose any information to outside parties?

We may disclose your personal information or any information you submit via the Platform to third parties if the disclosure of such information is reasonably necessary to comply with any applicable law, regulation, legal process or governmental request.

7. Your Clients' Data Disclosure

While providing you with text messaging services, we process your personal data and your clients' personal data such as phone numbers, names and other information and transmit them to the mobile operators or sub-processors that transmit text messages to the mobile operators. The list of mobile operators available for text messaging is published in the coverage section of your INTIS TELECOM account (the 'globe' icon on the top panel).

INTIS TELECOM may change this list from time to time unilaterally or upon your request by sending an email to an address specified in your account settings and/or by publishing the updated price list in the coverage section of your INTIS TELECOM account (the 'globe' icon on the top panel).

By registering an account at the Site, you allow us to use mobile operators' and other sub-processors' networks to process your and your clients' data to deliver your messages to recipients. All the sub-processors participating in your message delivery only process your data and never use them for any other purpose but to deliver your messages. All the sub-processors are liable for your data security and shall make all reasonable endeavors to maintain security at the highest level.

Nevertheless, we may disclose your clients' data to third parties if the disclosure of such information is reasonably necessary to comply with any applicable law, regulation, legal process or governmental request.

8. Access to Personal Information

You have the right to access the personal information you have submitted to INTIS TELECOM, which allows you an opportunity to identify and correct any inaccuracies in your personal account. If any of your personal information changes, you must let us know immediately by updating your account.

9. Erasure of Personal Information

We will delete all or some of your personal information:

- if we are required to do so by applicable law, regulation, legal process or governmental request;
- if we discover that you are under 18 years old;
- if your personal information is no longer necessary for the provision of our service and for the compliance of our obligations and rights arising from any contracts entered into between you and us;
- if you request us to do so, unless otherwise is required by applicable law, regulation, legal process or governmental request.

If you want to withdraw your consent for our collection or use of any or all of your personal information, please contact us at support@intistele.com or leave a message for our support team via the ticket system in the account (the “life belt” icon on the top panel).

10. Children Online Privacy Act Compliance

We are in compliance with the requirements of COPPA (the Children’s Online Privacy Protection Act); we do not actively collect any information from anyone under 13 years of age. Our Platform is intended exclusively for the use of people who are at least 18 years old.

11. Terms and Conditions

Please also visit our Terms and Conditions section of our Site. This establishes the use, disclaimers, and limitations of liability governing the use of our [Site](#).

12. Your Consent

By registering an account on the Site, you consent to our online privacy policy.

13. Changes to our Privacy Policy

If we decide to change our privacy, we will update the Privacy Policy modification date below.

The policy was last modified on 26 April 2018.