

Privacy Policy

Last Updated: August 23, 2020

This privacy policy (“**Privacy Policy**”) governs how we, Trink Ltd. d/b/a Trink.io (“**we**”, “**our**” or “**us**”) use, collect and store Personal Information (defined below) that we receive from our about you (“**User**”, “**you**”) such as in the following use cases:

- (i) When you browse or visit our website: <https://www.trink.io/> (“**Website**”)
- (ii) When you make use of, or interact with, our Website
 - a. When you contact us (e.g. customer support, send us a note)
 - b. When you subscribe to our newsletter, get notified, email list, blog
 - c. When you request a demo (or any other) mode
 - d. When you register to our services, create an account and log into, access or otherwise use our software
- (iii) When you attend a marketing event and provide Personal Information
- (iv) When you exchange business cards with us
- (v) When you interact with us on our social media profiles (e.g., Facebook, Instagram, Twitter, LinkedIn)

Please read this Privacy Policy carefully, so you can fully understand our practices in relation to Personal Information.

Important note: Nothing in this Privacy Policy is intended to limit in any way your statutory right, including your rights to a remedy or means of enforcement.

Table of contents:

1. Introduction
2. Terms of use
3. Consent and modification
4. What information we collect, why we collect it, and how it is used
5. How we protect and store your personal Information
6. How we share your personal Information
7. Your Privacy Rights
8. Use by children
9. Links to and interaction with third party product
10. Log Files
11. Cookies and other tracking technologies
12. Analytics tools
13. Your Choices
14. California privacy rights
15. Our California do not track notice
16. Contact us

This Privacy Policy may be updated from time to time and therefore we ask you to check back periodically for the latest version of this Privacy Policy. If we implement any significant changes to the use of your Personal Information in a manner different from that stated at the time of collection, we will notify you by posting a notice on our Website or by other means.

1. INTRODUCTION

We have implemented this Privacy Policy because your privacy, and the privacy of other users, is important to us. This Privacy Policy explains our online information practices and the choices you can make about the way your Personal Information is collected and used in connection with the Services. “**Personal Information**” means any information that may be used, either alone or in combination with other information, to personally identify an individual, including, but not limited to, a first and last name, a personal profile, an email address, a home or other physical address, or other contact information.

2. TERMS OF USE

This Privacy Policy forms part of our Terms of Use which is available at https://www.trink.io/trink_terms_of_use.pdf (“**Terms**”). Any capitalized but undefined term in this Privacy Policy shall have the meaning given to it in the Terms.

3. CONSENT AND MODIFICATION

You are not legally obligated to provide us Personal Information, and you hereby confirm that providing us Personal Information is at your own free will. By using the Website, you consent to the terms of this Privacy Policy and to our collection, processing and sharing of Personal Information for the purposes set forth herein. If you do not agree to this Privacy Policy, please do not access or otherwise use the Website. We reserve the right, at our discretion, to change this Privacy Policy at any time. Such change will be effective within ten (10) days following the posting of the revised Privacy Policy on the Website, and your continued use of the Website thereafter means that you accept those changes.

4. WHAT INFORMATION WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED

When you browse, or visit, our Website, we may collect data about you through Cookies, analytic tools. We collect this data in order to analyze trends, administer the Website, track users’ movement around the Website, and gather demographic information. We use anonymous identifiers in order for us to present you with customized information, and in order to track users. We also use Google Analytics to maintain and improve the Website and our products. We do not combine the information collected through the use of Google Analytics with personally identifiable information. We may share this information with third party platforms, such as Google Analytics, Intercom, Hotjar, and LinkedIn.

When you subscribe to our services/ our distribution list(s) / newsletter(s) via our Website, you will provide us with your full name and email address. We collect this information to enable you to register and login to our services, send you our newsletter, updated and other marketing communications. We may share this information with third party platforms, such as Google Analytics, Intercom, Hotjar, LinkedIn. In addition, the Website may include certain articles and/or blogs, to which you may add a written comment or response which will be published on the Website. Such comment or response may be submitted on an anonymous basis, however, to the extent that you include in such comments or responses any Personal Information, such Personal Information may be publicly available to other users of the Website.

When you contact us (e.g. customer support, need help, submit a request), you will provide us with the following information: full name, email address and any messages or other information you wish to share with us. We use this information to answer your questions and to provide support (e.g. to solve problems, bugs or issues). We may share this information with third party platforms, such as Google Analytics, Intercom, Hotjar, LinkedIn.

When you attend a marketing event, provide us with your business cards and/or provide us with your personal information for marketing purposes, we collect personal information that you provide us with, such information contains the following types of Personal Information: Full name, e-mail address, phone number, company name, job title, country, and any other information you may wish to share with us. We use this information to establish a business connection and to send you marketing communications. We share this information with third party platforms such as, Google Analytics, Intercom, Hotjar, LinkedIn.

Finally, please note that some of the abovementioned Personal Information will be used for detecting, taking steps to prevent, and prosecution of fraud or other illegal activity, to identify and repair errors, to conduct audits, and for security purposes. Personal Information may also be used to comply with applicable laws, with investigations performed by the relevant authorities, law enforcement purposes, and/or to exercise or defend legal claims. In certain cases, we may or will anonymize or de-identify your personal Information. “Anonymous Information” means information which does not enable identification of an individual user, such as aggregated information about the use of our services. We may use Anonymous Information and/or disclose it to third parties without restrictions (for example, in order to improve our services and enhance your experience with them).

5. HOW WE PROTECT AND STORE YOUR INFORMATION

- a. **Security.** We have implemented appropriate technical, organizational and security measures designed to protect your Personal Information reduce the risk of accidental destruction or loss, or the unauthorized disclosure or access to such Information appropriate to the nature of the information concerned. However, please note that we cannot

guarantee that the information will not be compromised as a result of unauthorized penetration to our servers. Nevertheless, we make commercially reasonable efforts to make the collection and security of such information consistent with this Privacy Policy and all applicable laws and regulations. As the security of information depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.

- b. **Retention of your Personal Information.** We may store your personal Information for as long as such personal Information is necessary in accordance with the purpose for which we collected it, and as long as necessary to fulfill your requests or inquiries or provide services. In addition, in some circumstances we may store your Personal Information for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, or (iii) if we reasonably believe there is a prospect of litigation relating to your Personal Information or dealings.

6. HOW WE SHARE YOUR PERSONAL INFORMATION

In addition to sharing your Personal Information as set forth in Section 4 above, we also share your Personal Information as follows:

- a. With our hosting providers;
- b. With our service providers, such as service providers providing us with cloud storage services;
- c. With our staff and other entities within our group.

We may also share your information as follows:

- d. To the extent necessary, with regulators, courts or competent authorities, to comply with applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order;
- e. If, in the future, we sell or transfer some or all of our business or assets to a third party, we will (to the minimum extent required) disclose information to a potential or actual third party purchaser of our business or assets. In the event that we are acquired by or merged with a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer or assign Personal Information in connection with the foregoing events; and
- f. Where you have provided your consent to us sharing or transferring the Personal Information (e.g., where you provide us with marketing consents or opt-in to optional additional Services or functionality).

We may transfer your Personal Information to our local or foreign subsidiaries or affiliated companies for the purpose of storing or processing such information on our behalf. Such information may be transferred to other countries (including US). We require that these parties agree to process such information in compliance with our Privacy Policy.

7. YOUR PRIVACY RIGHTS.

You may have certain rights under applicable privacy laws, such as accessing, correcting and deleting Personal Information, objecting to processing of Personal Information, withdrawing of consent to processing Personal Information. To the extent such privacy laws apply to you, we will respect your rights and comply with such laws. You can exercise your rights by contacting us at privacy@trink.io. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly in accordance with applicable law or inform you if we require further information in order to fulfil your request. When processing your request, we may ask you for additional information to confirm or verify your identity and for security purposes, before processing and/or honoring your request. In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initially requested, we will address your request to the maximum extent possible, all in accordance with applicable law.

8. USE BY CHILDREN

We do not offer our products or services for use by children and, therefore, we do not knowingly collect personal information from, and/or about children under the age of eighteen (18). If you are under 18, you may not use the Website, or provide any information to the Website without involvement of a parent or a guardian. In the event that we become aware that you provide personal Information in violation of applicable privacy laws, we reserve the right to delete it. If you believe that we might have any such information, please contact us at privacy@trink.io.

9. LINKS TO AND INTERACTION WITH THIRD PARTY PRODUCTS

The Website may enable you to interact with or contain links to your Third Party Account and other third party websites mobile software applications and products or services that are not owned or controlled by us (each a “**Third Party Service**”). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services may collect Personal Information from you. Accordingly, we encourage you to read the terms and conditions and privacy policies of each Third Party Service that you choose to use or interact with.

10. COOKIES AND OTHER TRACKING TECHNOLOGIES

Our Website utilizes “cookies”, anonymous identifiers and other tracking technologies in order for us to provide our Website and present you with information that is customized for you. A “cookie” is a small text file that may be used, for example, to collect information about activity on the Website. Certain cookies and other technologies may serve to recall Personal Information, such as an IP address, previously indicated by a user. Most browsers allow you to control cookies, including whether or not to accept them and how to remove them. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser.

11. ANALYTIC TOOLS

- **Google Analytics.** The Website uses a tool called “Google Analytics” to collect information about use of the Website. Google Analytics collects information such as how often users visit this site, what pages they visit when they do so, and what other sites they used prior to coming to this Website. We use the information we get from Google Analytics to maintain and improve the Website and our services. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google’s ability to use and share information collected by Google Analytics about your visits to this Website is restricted by the Google Analytics Terms of Service, available at <https://marketingplatform.google.com/about/analytics/terms/us/>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. You may learn more about how Google collects and processes Information specifically in connection with Google Analytics at <http://www.google.com/policies/privacy/partners/>. You may prevent your Information from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>.
- **Hotjar.** The Website uses Hotjar in order to better understand our users’ needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don’t like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect Information on our users’ behavior and their devices (in particular device’s IP address (captured and stored only in anonymized form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), preferred language used to display our Website). Hotjar stores this information in a pseudonymized user profile. Neither Hotjar nor we will ever use this information to identify individual users or to match it with further Information on an individual user. For further details, please see Hotjar’s privacy policy at <https://www.hotjar.com/legal/policies/privacy>. You can opt-out to the creation of a user profile, Hotjar’s storing of Information about your usage of our Website and Hotjar’s use of tracking cookies on other websites on this link <https://www.hotjar.com/legal/compliance/opt-out>.
- **Intercom.** We also use “Intercom” which is a sales marketing and support tool, and assists us in engaging with and retaining customers. Intercom’s ability to use and share information is governed by the Intercom Terms of Use, available at <https://www.intercom.com/legal/terms-and-policies>, and the Intercom Privacy Policy, available at <https://www.intercom.com/legal/privacy>. You can opt-out of Intercom’s services by clicking on the following link: <https://www.intercom.com/legal/cookie-policy>.
- **LinkedIn.** We also use “LinkedIn” which is used by us to track inbound link clicks. LinkedIn’s ability to use and share information is governed by the LinkedIn Terms of Use, available at <https://www.linkedin.com/legal/user-agreement>, and the LinkedIn Privacy Policy, available at https://www.linkedin.com/legal/privacy-policy?trk=homepage-basic_footer-privacy-policy. You can opt-out of LinkedIn’s services by clicking on the following link: <https://www.linkedin.com/legal/cookie-policy>.

We reserve the right to remove or add new analytic tools.

12. YOUR CHOICES

You have certain choices about your Personal Information. Where you have consented to the processing of your Personal Information, you may withdraw that consent at any time and prevent further processing by contacting us as described in this Privacy Policy. Even if you opt out, we may still collect and use non-Personal Information regarding your activities on our services and for other legal purposes as described above. While we cannot guarantee privacy perfection, we will address any issue to the best of our ability as soon as possible. We will process such requests in accordance with applicable laws. To protect your privacy, we will take steps to verify your identity before fulfilling your request.

13. CALIFORNIA PRIVACY RIGHTS

California Civil Code Section 1798.83 permits our customers who are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please send an email to privacy@trink.io. Please note that we are only required to respond to one request per customer each year.

14. OUR CALIFORNIA DO NOT TRACK NOTICE

We do not track consumers over time and across third party websites and therefore do not respond to Do Not Track signals. We do not allow third parties to collect personally identifiable information about an individual consumer's online activities over time and across different websites when a consumer uses the Website.

15. CONTACT US

If you have any questions, concerns or complaints regarding our compliance with this notice and the information protection laws, or if you wish to exercise your rights, we encourage you to first contact us at privacy@trink.io.