

Privacy Policy Last Updated: August 20, 2021

1. INTRODUCTION

At ecomedes, we are committed to respecting and protecting your privacy.

This Privacy Policy describes how we collect, use and share information about you that we may obtain through your use of our website at <https://www.ecomedes.com/> (the “Website”) and the products and services we provide through the Website (collectively referred to as the “Services”).

Please read this [Privacy Policy](#) and the [Terms of Use](#) of our Website, before you use our Website or Services. By using our Website or Services, you are accepting and consenting to the practices described in this Privacy Policy (including as changed from time to time). If, for any reason, you do not agree to the terms of this Privacy Policy, please stop using our Website or Services immediately.

Please also note that in this Policy the terms “ecomedes” and “we”, “us” and “our” refer to ecomedes, Inc. – a Delaware corporation and does not refer to any of our affiliates, or business partners, which include our vendors, contractors, service providers and agents, unless otherwise stated in this Privacy Policy.

2. EU PRIVACY NOTICE

If you are in the European Union (EU), or a resident of the EU, and the EU data protection laws applies to processing of your information, i.e. the General Data Protection Regulation 2016/679 (GDPR)

- ecomedes Inc. is the controller of personal data submitted by you or otherwise collected when you use our Website or when you use Services – provided that we explicitly demand this data or ask for these information within our mutual B2B communication with respect to the Service.

Please note however that ecomedes shall not be the controller of any third-party data you may submit to our Service, e.g. the personal data you process within your CRMs, e-mail communication, etc., which may be integrated with our Service upon your decision and subject to the Terms of Service. We process such information within the Service solely in the processor’s role and – depending on the scope of your activity you may be the data controller. Shall you have any doubts on this matter – feel free to contact us.

- You can contact us via e-mail: privacy@ecomedes.com. You can also find our full contact information in Section 12 of the Privacy Policy.
- The purpose for processing of your information is mostly to supply you with Service and Website functionalities. Therefore, when you submit us with information needed to

supply you with our Services or Website functionalities the legal grounds for processing is the contract fulfilment or taking steps prior to entering into contract. For example, we may use your data to settle payments, to adjust the Service or Website to your needs, to personalize the Service, for customer service, to address your request, etc. You can find a more exhaustive list of purposes of data processing and categories of personal data concerned in Sections 3 and 4 of the Privacy Policy.

- You submit us with your information voluntarily and we use them to provide you our Service or Website functionalities so providing the information may be a contractual requirement or a requirement necessary to enter into a contract (to use the Service or Website). We minimize the scope of information we collect, and you will always be informed which data is obligatory to be supplied with our Service or chosen Website's functionalities or we could otherwise deny serving them.
- We may also use the collected data for other purposes than to fulfil our contractual obligations as stated in Terms of Service and when we otherwise oblige ourselves to supply you with any services. We may do so on the grounds of our legitimate interest and those of third parties while applying appropriate safeguards that protect your privacy.. Please refer to the list of purposes of data processing and categories of personal data concerned in Sections 3 and 4 of the Privacy Policy to find more exhaustive information.
- We process your data only when we have a valid legal basis to do so; mostly to fulfil the contract we may have with you or to pursue our legitimate interests. Nevertheless, please be informed that if we ask for your agreement to process your information for specific purposes, you have the right to withdraw your consent at any time. We are also obliged to inform you that we may process your data when we believe we have a legal obligation to do so – in particular when we need to respond to an enforceable authorities' request or court order.
- Your data may be disclosed and hence transferred to our vendors, affiliates, agents, service providers or other the trusted third-party recipients to the extent reasonably necessary to provide you with Service and Website such as a third-party e-mail platform, payment processors, marketing partners, web analytics, statistics. These third parties use any information we share only to support us and our efforts to provide you with our Website or Services. .
- You have the right to access, rectify or erase your personal data, restrict the processing and object to processing of your data at any time. You can enforce these rights by using and managing your account after a login to Service or – as always by contacting us at: privacy@ecomedes.com; please note that erasing the personal data, processing restriction and objection to may involve cancellation of Service, inability to use Website, etc. depending on the circumstances or may be otherwise limited by respective laws. You shall also have the right to so-called data portability which involves the possibility to download all your data in a machine-readable format. To get such a copy of your data, please email us at privacy@ecomedes.com; Please be notified, that requests may take up to 30 days to process.

- Shall you have any privacy related complaints or suggestions, please contact us at privacy@ecomedes.com or at our business address – where we'll do our best to help; we will also work with the regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer or other processing of your data that we cannot resolve with you directly – particularly within the EU-US and Swiss-US Privacy Shield Frameworks; you also have the right to lodge a complaint with a data protection supervisory authority relevant for your country.

In any case please also review the sections below to learn more about our Privacy Policy.

3. INFORMATION WE COLLECT

We collect certain information to help us operate and provide the Website and our Services, to process your requests and transactions, to communicate with you, for security and fraud prevention, and to comply with law. We may also use personal data for other purposes with your consent. We may collect information about you depending on how you interact with us, including as described in this Section 3. If you do not wish to provide us with your personal information, please delete your account or send us an email to privacy@ecomedes.com and do not use our Website or Services in any way.

3.1. Automatically through the Website

We may automatically collect information when you use the Website, including:

- Information about the device(s) you use to access the Website, including MAC address, IP address, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, device type, and device identifiers;
- Information about your visits to the Website, including the full URL clickstream to, through and from these websites (including date and time);
- Information we need and use to facilitate your use of the Website (including to provide access to third party websites), such as URL requests, destination IP addresses, or device configuration details;
- Website pages and listings you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

We may also use technologies to automatically collect tracking information on your mobile device or your browser. The technologies include:

- Cookies and mobile cookies. A cookie is a small file placed on your computer or mobile device. We may use cookies and similar technologies to support the functionality of our Website and Services. This provides a better experience when you use our Website or Services and allows us to improve our Website and Services. It may be possible to refuse to accept cookies or mobile cookies by activating the appropriate setting on your browser or smartphone. However, if you select this setting you may be unable to access certain parts of our Website or use certain functionalities of our Services.

- Web Beacons. Certain part of our Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit the us, for example, to count users who have visited those pages or opened an e-mail and for other related app statistics (for example, recording the popularity of certain app content and verifying system and server integrity).
- Behavior tracking. We may use technologies, which can collect information about your activities over time and across third-party websites, apps or other online services (behavioral tracking) with your consent.

You may request us to stop the collection of tracking information at any time by adjusting the settings on your device or contact us at privacy@ecomedes.com. Please note that disabling these features may render some or all of our Website or Services unavailable.

When you register for an account with us, we may collect additional information automatically from you. For example, when you choose to connect your e-mail account with our system, ecomedes may collect additional information from you, including the content of your e-mail messages, your contacts, and entries in any calendars associated with your e-mail account. IT IS YOUR RESPONSIBILITY TO CONFIRM THAT YOU HAVE THE RIGHTS TO CONNECT YOUR E-MAIL TO OUR SERVICES. BY CONNECTING A WORK E-MAIL TO OUR SYSTEM, YOU REPRESENT THAT YOU HAVE OBTAINED ALL NECESSARY CONSENT FROM YOUR EMPLOYER AND THAT YOUR EMPLOYER HAS READ AND CONSENTED TO OUR PRIVACY POLICY. You may choose not to connect your e-mail account to our system, however, certain parts of our Services may not work.

3.2. Information You Provide to Us

- We collect information you provide directly to us through the Website or Services, including when you sign up for a tutorial, apply for a job and otherwise provide your name, contact information and other information to us through the Website or Services.
- In addition, if you send us an email, fill out a feedback form, call us, chat with us or communicate with us in any other way, we will collect that information in order to respond to your request, feedback, or question. We will use and share information you provide to us only as described in this Privacy Policy.

(a) Personal Information

Some of the information we collect through your use of the Website or Service or through your communications with us, such as your name, email address, phone number, employer name, position and social media usernames may personally identify you. We will treat this information as “Personal Information.” We will also treat as Personal Information any non-Personal Information that is combined with Personal Information.

(b) Job Applicants

We collect certain Personal Information from you through third party job sites for jobs posted on our Website. These include your full name, email address, phone number, LinkedIn username, resume, cover letter and other information generally expected of in a job application. Any prospective job applicants must read and consent to both our privacy policy and the privacy policy of the third party site prior to submitting any Personal Information to us.

(c) Registered Users

We collect Personal Information from you when you register for an account with us, update your account information, create or modify a project on the Website, or pay for our Services. These may include your full name, email address, phone number, employer name, position, ecomedes username and password, and any credit card, debit card, or checking information. We may also collect any Personal Information you upload through our Service, including contact lists, files and other materials containing Personal Information.

(d) Social Media

Our Website allows you to interact with us on various third party social media platforms such as Facebook, Twitter, and LinkedIn. When you choose to interact with us via social media platforms, we may automatically collect additional Personal Information from you. These may include your personally identifiable information list, the profile pictures of the contact list, education, work history, events, relationship status, likes, gender, location, URL, biography, any additional image or information. We may also collect your communications with us through the third party social media platforms. We may also record phone calls and video calls with you. If we are recording, you will be informed about the fact that each call is recorded at its beginning, and if you don't wish the call to be recorded, you will have the option to not continue the call. We may also collect records and copies of your correspondence (including e-mail addresses and phone numbers) with us.

With your consent, we may also collect:

- Your responses to surveys that we might ask you to complete for research purposes.
- Any other types of information you instruct us to collect.

3.3. Aggregate or Anonymized Information

We may combine certain information about your use of the Website with similar information that we obtain from other users for use in an aggregate or anonymous manner.

3.4. Other Collection of Information

We will not ask for or request any sensitive medical, financial and governmental information. Please do not provide such information to us through emails, feedback forms or in any other way.

4. HOW YOUR INFORMATION IS USED

We use information that we collect about you or that you provide to us, including but not limited to any Personal Information to:

- Provide you with information and Services offered on our Website.
- Perform any data analysis necessary to perform our Website, including administration, internal operations, troubleshooting, data analysis, testing, research, statistical and survey purposes.
- Manage your access to our Website or Services.
- Send you information that allows you to use our Website or Services.
- Provide you with any other information, products and services from us or our partners including advertisers.
- Notify you when an update is available, and of changes to any products, Website or Services that we offer or provide through the update.
- Estimate our audience size and usage patterns.
- Fulfill any other purpose for which you provide.
- Store information about your preferences.
- Allow us to customize our Website and Services according to your individual interests.
- Speed up our Website or Services.
- Recognize you when you use our Website or Services.
- Comply with applicable laws and regulations and other legal requirements.
- Maintain the security of our Website and Services.

5. HOW YOUR INFORMATION IS SHARED

We will not sell or share your Personal Information with third parties for direct marketing purposes that are unrelated to your use of the Services.

We may share your information, including Personal Information, with our vendors, service providers and agents to the extent reasonably necessary to provide you with the Website. For example, we use a third-party platform for email and cannot communicate with you without disclosing your email address to our third-party email provider. These third parties use any information we share only to support us and our efforts to provide you with our Website or Services.

We may share your information, including Personal Information:

- To provide our Website or Services;
- With our affiliates and partners to offer you additional services;
- With service providers and contractors to the extent reasonably necessary to enable us to provide you with our Website or Services;
- With partners and vendors in connection with projects you create or interact with;
- With service providers, vendors and partners of products or services displayed on our Website for which you request or access documentation or other content;
- During an acquisition or transfer of a majority of the assets of ecomedes;

- To comply with any court order, law or legal process, including to respond to any government or regulatory request;
- To enforce our rights arising from any contracts entered into between you and us;
- If we believe disclosure is reasonably necessary or appropriate to protect the rights, property, or safety of ecomedes, our customers or others;
- With you, upon your request; and
- To fulfill the purpose for which you provide it.

We may share non-Personal Information, aggregate or anonymous data with analytics, search engines or other service providers that help us improve our Website or Services.

6. YOUR CHOICES

You may have the opportunity to receive certain communications from us related to our Website or Services. If you provide us with your email address in order to receive communications, you can opt out at any time by using the unsubscribe links at the bottom of our emails. Please note that certain emails may be necessary to provide you with our Website or Services. You will continue to receive these emails, if appropriate, even if you unsubscribe from our optional communications.

6.1. Do Not Track Signals

Some browsers, Apps and devices support a “Do Not Track” feature. Our Website and Services do not currently change the way they operate based upon detection of a Do Not Track or similar signal.

7. SECURITY

The security of your information is important to us. We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration and disclosure. We also use encryption technology to protect certain information.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your information, we cannot guarantee against access to your Personal Information by unauthorized third parties. The security of your information transmitted to or through our Website or Services is at your own risk.

8. CHILDREN'S PRIVACY

The Website and Services are not intended for and are not directed toward children. We do not serve anyone under the age of 18 and we do not knowingly collect information from anyone under the age of 18. If you are under 18 years of age, you are not permitted to submit any Personal Information to us. If you believe we might have any information from or about a child, please contact us at privacy@ecomedes.com.

9. EXTERNAL LINKS

The Website may include links to and from the websites of our partner networks and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for such privacy policies. Please check the privacy policies applicable to any other website you access via the Website before you submit any personal information to such other websites.

10. GEOGRAPHIC LOCATIONS

10.1. Transfer of Your Information to the United States.

The Website is operated, and the Services are provided, from the United States. If you are located anywhere outside of the United States, please be aware that information we collect, including Personal Information, may be transferred to, processed and stored in the United States. Where the data transfer route is no longer available, an appropriate alternative will be put in place. By using our Website or Services, or by providing us with any information, you consent to this transfer, processing and storage of your information in the United States.

10.2. Privacy Rights for Residents of the European Economic Area

If you are resident in the European Economic Area, under European law you have the following rights in respect of your personal information that we hold:

- Right of access. You have the right to obtain confirmation of whether, and where, we are processing your personal information; information about the categories of personal information we are processing, the purposes for which we process your personal information and information as to how we determine applicable retention periods; information about the categories of recipients with whom we may share your personal information; and a copy of the personal information we hold about you.
- Right of portability. You have the right, in certain circumstances, to receive a copy of the personal information you have provided to us in a structured, commonly used, machine-readable format that supports re-use, or to request the transfer of your personal data to another person.
- Right to rectification. You have the right to obtain rectification of any inaccurate or incomplete personal information we hold about you without undue delay.
- Right to erasure. You have the right, in some circumstances, to require us to erase your personal information without undue delay if the continued processing of that personal information is not justified.
- Right to restriction. You have the right, in some circumstances, to require us to limit the purposes for which we process your personal information if the continued processing of the personal information in this way is not justified, such as where the accuracy of the personal information is contested by you.
- Right to object. You have a right to object to any processing based on our legitimate interests where there are grounds relating to your particular situation. There may be

compelling reasons for continuing to process your personal information, and we will assess and inform you if that is the case. You can object to marketing activities for any reason.

- If you are resident in France, you also have the right to set guidelines for the retention and communication of your personal information after your death.

If you wish to exercise one of these rights, please contact us at privacy@ecomedes.com

You also have the right to lodge a complaint to your local data protection authority.

Residents in other jurisdictions may also have similar rights to the above. Please contact us at privacy@ecomedes.com if you would like to exercise one of these rights, and we will comply with any request to the extent required under applicable law.

10.3. California Residents

If you are a California resident, please see www.ecomedes.com/privacy/california

11. CHANGES TO OUR PRIVACY POLICY

We may update our Privacy Policy from time to time. If we make material changes to how we treat our users Personal Information, we will post the new privacy policy on the Website at [www.ecomedes.com/privacy]. The date that the Privacy Policy was last revised is identified at the top of the page. You are responsible for periodically visiting this account to check for any changes.

12. CONTACT INFORMATION

Questions, comments, requests and other communications regarding this Privacy Policy are welcomed and should be addressed to:

ecomedes, Inc.

Email: privacy@ecomedes.com