

# Privacy Policy

This document “Privacy Policy” (hereinafter referred to as the “Policy”) is the terms for processing the Personal information by GetReview FZCO company (hereinafter referred to as “GetReview”).

If you are in the European Union, GDPR is applicable to the processing of your personal data. GetReview takes every effort to comply with GDPR and adopted this Policy as a part of such compliance.

## USER’S CONSENT:

By checking the box “I agree” accompanied with the link to this Policy you (hereinafter also referred to as “User”) with your own free will and for your benefit give your written consent to the processing of User’s Personal Information for the purposes and under the terms and conditions stipulated by this Policy.

## 1. Terms and Definitions

**1.1. Agreement** – Agreement on use of the Platform, executed based on Terms of Use that is posted and/or available on the Internet at: <https://getreview.com/terms>, as well as other agreements executed by the User, when it is expressly stipulated by the terms and conditions thereof.

**1.2. GetReview Platform (Platform)** - GetReview’s software platform that includes the website <https://getreview.com/> (Website), Products and other software applications and databases designed for incorporation of video materials onto websites.

**1.3. Products** means software programs and databases in the form of the Platform’s components and/or the Platform’s functionality indicated in the Subscription plans.

**1.4. Tools** means the GetReview’s software tools provided to User as a client part of the Products: a) video widgets that User incorporates into the User’s websites to facilitate streaming on such website of video materials uploaded to the Platform; b) tools for

recording of video materials that User at his/her own discretion makes available to Reviewers for recording and uploading of video materials to the Platform in favor of User.

1.5. **User** – means a person or entity that has entered into the Agreement with GetReview in an order stipulated therein.

1.6. **Reviewer** means natural person who has recorded and provided video materials to User using Tools that were made available to him/her by User.

## **2. General Provisions**

2.1. This Policy is an integral part of the Agreement as well as other agreements, when it is expressly stipulated by such agreements. Therefore, when executing the above said agreements by methods defined therein including by registration on the website <https://getreview.com> and/or using the Platform you fully accept the terms of this Policy.

2.2. Methods of processing of Personal Information include any action (operation) or a combination of actions (operations) with Personal Information including collection, recording, systematization, storage, updating (refreshment, modification), extraction, use, transfer (provision, access) including transfer to the territories of foreign countries, depersonalization, blocking, deletion, destruction in the purposes established by this Policy with/without the use of automated facilities.

2.3. The terms and definitions provided for by the Agreement are used herein, as well as other agreements entered into with the User, unless otherwise provided for by this Policy or follows from the merits thereof. In other cases, the terms used in the Policy shall be interpreted in accordance with the applicable laws, the business practice, or scientific doctrine.

## **3. Personal Information**

3.1. Personal information in this Policy means as follows:

3.1.1. Information that the User provides about him/her on registration or authorization, as well as during further use of the Platform, including personal data of the User.

3.1.2. Data transmitted in a depersonalized form in automatic mode, depending on the settings of the User's software.

- 3.2. GetReview is entitled to establish requirements for the composition of the User's Personal Information, which are mandatory for the use of the Platform. If certain information is not marked by the GetReview as mandatory, it is provided or disclosed by the User at his/her discretion.
- 3.3. When being registered in the Platform, the User shall provide in the mandatory manner: name, corporate email, URL of the User's website or name of the User's company. In order to fill out a profile in the Platform, the User can also provide: last name, phone number.

Registration and/or authorization in the Platform can be performed using authentication service of social networks (Facebook, Google, etc.). In that case, User provides Personal information to GetReview through use of such authentication service, and that Personal information includes items that can be stored in User's profile in the Platform.

In course of intended use of the Platform and/or Products User may provide video materials that may contain User's image and other information about the User.

When submitting request through the contact form User provides: name, phone number, email, company's name.

When subscribing for news email must be provided.

When acting on behalf of a company, User may provide information about such company that is required to process a payment and may include: name, registration and other identity numbers, address, bank details, etc. Information about the company does not constitute personal data.

- 3.4. GetReview will not verify whether the User has the necessary consent for the processing of the provided Personal Information in accordance with this Policy, believing that the User acts in good faith, carefully and makes every effort to obtain all necessary agreements of the subjects of personal data.
- 3.5. GetReview collects and stores data about the User's activities in the Platform, using log files. In the event that the actions are committed by a logged-in User, such information is related to the User's profile.
- 3.6. User acknowledges and accepts that at use of the Platform anonymous data may be collected automatically, including by the third party software, as a result, GetReview and

such third party can receive and transmit the data in a depersonalized form as stipulated in the paragraph 2.1.2 hereof.

The aforementioned third party software includes the following analytics and advertising services:

- ‘Google Analytics’ and ‘Google Tag Manager’ that collect and process data according to privacy policy available at: <https://policies.google.com/privacy>;
- ‘Facebook Pixel’ that collects and processes data according to privacy policy available at: [https://web.facebook.com/full\\_data\\_use\\_policy](https://web.facebook.com/full_data_use_policy)
- ‘Intercom’ that collects and processes data according to privacy policy available at: <https://www.intercom.com/terms-and-policies#privacy>

The above mentioned list of the third party software is not limiting. Get Review may use other similar services (software) and/or cease the use of the listed one.

Anonymous data collected with such third party software may include:

- browser data (type, version, cookies\*);
- operating system data (type, version, screen resolution);
- query data (time, source, IP address).
- other anonymous information about User’s activity in the Platform.

The scope and conditions for collection and use of anonymous data by these services are determined directly by these services’ providers and governed by the relevant policies available at their websites.

Accepting this Policy as well as applying certain setting in his/her software including settings of device’s operating system, the User agrees with conditions for collection and use of data by the providers of above listed software services.

\*Cookies are small text files recording onto the user’s device and containing information about user’s actions in the Internet. Some of these files serve to determine location, others – to save the user's settings. User at his/her on discretion sets up in User’s browser the parameters of cookies’ use. However, it is not recommended to turn off use of all

cookies because in that case User will not be able to use some functionality of the Platform.

#### **4. Legal basis of processing of Personal information**

The legal basis on which GetReview relies for the use of Personal information includes:

- 4.1. Processing of Personal information where User has given consent for one or more specific purposes;
- 4.2. Processing of Personal information that is necessary for performing a contract to which User is a party;
- 4.3. Processing of Personal information that is necessary for pursuing the GetReview's legitimate interests. Specifically, the GetReview's legitimate interests consist of ensuring safety and improving functionality of the Platform; of data analysis; protection GetReview and the Users from fraud.

#### **5. Policy with regard to children**

- 5.1. GetReview does not intentionally collect personal data from children younger than 16, it does not request it and does not allow them to use the Platform. Persons under 16 are not allowed to provide personal information including name, address, telephone number and e-mail. If GetReview gets to know that the information was collected from a child under 16, GetReview shall immediately delete such information. If you think we could have obtained any information from a child or about a child under 16, please, contact us through e-mail indicated below.

#### **6. Purposes for Personal Information Processing**

- 6.1. GetReview performs processing, including collection and storage of the User's personal data required for entering into and executing agreements with the User.
- 6.2. GetReview is entitled to use the Personal Information for the following purposes:
  - 6.2.1. Entering into the Agreement on use of the Platform;
  - 6.2.2. Fulfillment of obligations under the Agreement, including provision the User with access to the Platform and functionality of the Products;

- 6.2.3. Identification of the User within the fulfillment of the obligations under the Agreement;
- 6.2.4. Providing communication with the User for the purpose of support and improving the quality of the Platform, including by way of notification with the involvement of third parties;
- 6.2.5. Marketing, statistical and other research based on depersonalized data from the analytics systems stipulated in the paragraph 3.7. hereof for the purpose of improvement of the Platform.
- 6.2.6. Targeting of advertising and/or informational materials based on depersonalized data from the analytics systems stipulated in the paragraph 3.7. hereof.

## **7. User's Rights to User's Personal Information**

- 7.1. Subject to specific provisions of applicable law, the User has the right:
  - 7.1.1. to be informed about the collection and use of his/her personal data.
  - 7.1.2. to access his/her personal data and have it corrected if it is wrong or incomplete.
  - 7.1.3. to restrict the processing of his/her personal data where the accuracy of the personal data is contested, where the processing is unlawful, and where GetReview no longer needs the personal data for the purposes for which GetReview has processed it.
  - 7.1.4. to object to the processing of his/her personal data and also restrict its processing in those instances where GetReview undertook processing of it in carrying out a task in the public interest or where necessary for our legitimate interest where there is no compelling reason for its continued processing.
  - 7.1.5. to withdraw consent that User had given to the collection and processing of his/her personal data at any time. If User does withdraw his/her consent to the collection and processing of personal data, that withdrawal shall not affect the lawfulness of any processing by GetReview that is based on the consent User had given before he/she withdrew it.
  - 7.1.6. to obtain the deletion of his/her personal data when it is no longer relevant to the purposes for which it was collected or processed, when User has withdrawn consent and there is no basis for us to continue processing, when User has objected to further processing and there is no compelling interest for continued processing, and when the data was unlawfully processed.
  - 7.1.7. not to be a subject to a decision based solely on automated processing, including profiling, which produces legal affects concerning User or similarly affecting User, except where there is a lawful basis for continued processing.

- 7.1.8. to receive personal data in a structured, commonly used, and machine readable form for the purpose of data portability in those instances where GetReview processes by automated means personal data that User has provided.
- 7.2. These rights may be exercised by using the tools GetReview offers in the Platform or by contacting GetReview with specific request through the methods described below. GetReview will address any such requests in a timely manner and according to applicable law. In certain cases, GetReview may ask User to verify identity before acting on User's request. If User is unsatisfied with GetReview's response, User may refer his/her complaint to the relevant supervisory authority in User's jurisdiction.

## **8. Personal Information Storage Retention**

- 8.1. All Personal Information that is collected will be stored only as long as is necessary to accomplish the purpose for which it is collected, and/or as long as is permitted or required by applicable law. Periodically, GetReview will review its data processing systems to determine whether or not the purposes for the collection and processing of User's personal data remain valid. That determination will be based on factors that include, but are not limited to, whether or not you are still in contact with GetReview, whether or not any requests made by User from GetReview have been fulfilled (including any follow-up tasks), whether or not there is a contractual relationship between User and GetReview, and whether or not there is a contractual or legal basis for continuing to retain User's personal data. Based on that review and any notifications received from data subjects, GetReview will update its systems.

## **9. Requirements for the Personal Information Protection**

- 9.1. GetReview stores the Personal Information and provides its protection against unauthorized access and distribution in accordance with internal terms and regulations.
- 9.2. With regard to the User's Personal Information, its confidentiality is protected, except for publicly available information (paragraph 3.4 hereof) and other cases when the technology of the Platform provided on its basis or the configuration of the User's software provides for an open exchange of information with other users of the Platform or with any Internet users.

## **10. Transfer of the Personal Information**

- 10.1. GetReview is entitled to transfer Personal Information to third parties in the following cases:

- 10.1.1. The User expressed his/her consent to such actions, including when the User applies the settings of the used software that specifically allow or do not limit the provision of certain information;
- 10.1.2. The transfer is performed as the functionality of the Platform and/or necessary in the context of the specificity of the Platform;
- 10.1.3. In connection with use in the Platform of third party software for collection and processing of User's data. Specifically, GetReview may use the third party software for collection and processing of User's data according to clause 3.7. of this Policy.
- 10.1.4. Due to the transfer of the Platform to the possession, use or property of a third party, including the assignment of rights under contracts concluded with the User in benefit of such third party;
- 10.1.5. Upon request of a court or other state authority within the procedure established by law;
- 10.1.6. To protect the rights and legitimate interests of GetReview in connection with failure to comply with the agreements entered into with the User.

## **11. Amendments to and deletion of the Personal Information**

- 11.1. Subject to available functionality of the Platform the User may at any time at his/her own discretion delete and/or edit the Personal Information in his/her account with the Platform.
- 11.2. User may send request for amendment or deletion of the Personal information to GetReview to the email address stated below in this Policy.
- 11.3. The User is entitled to delete his/her own account with the Platform or to exercise other rights related to the processing of his/her personal data by sending to GetReview a request at the address indicated below.

## **12. Third parties' data collection and processing**

- 12.1. GetReview provides to Users Products for incorporation of video materials onto websites and, in connection with maintaining of the server part of such Products, GetReview processes data of the Reviewers and users of the User's websites (Third party Data) collected by User through use of the Tools (client part of the Products).



- 12.2. The User who uses the Products controls Third party Data processed with use of the Products.
- 12.3. GetReview processes the Third party Data within the functionality of the Products by the server part of the Products as processor on behalf of and upon instructions of the User which use the Product's functionality and is controller of such data.
- 12.4. The composition of the Third party Data shall be defined by User within the functionality of the Platform and may include:
- i. Information provided by Reviewer via electronic forms: Name, surname, date of birth, phone number, email;
  - ii. Information contained in the video materials recorded and provided to User by Reviewer;
  - iii. ii. Anonymous information about Reviewer's device and activity: IP addresses, MAC addresses, device IDs including all advertising IDs, HTTP Header and user agent (country, language, local settings, version of the) operating system;
  - iv. iii. Anonymous information about the device and activity of user of the User's website: IP addresses, MAC addresses, device IDs including all advertising IDs, HTTP Header and user agent (country, language, local settings, version of the) operating system.
- 12.5. GetReview uses the Third party Data solely in course of provision Products' functionality to the Users.
- 12.6. GetReview at its own does not share or disclose the Third party Data with anyone else except with GetReview's server providers and in response to lawful requests by public authorities, including national security or law enforcement requirements. GetReview stores the data as long as its Users are using the Platform because it is needed to provide the Products to Users.

### **13. Amendments to the Privacy Policy**

- 13.1. This Policy may be amended or terminated unilaterally by GetReview without prior notice to the User. The new version of the Policy becomes effective after posting on the GetReview's Website, unless otherwise provided for by the new version of the Policy.

13.2. The current version of the Policy is on the GetReview's Website at:

<https://getreview.com/privacy-policy>

**14. GetReview's Details:**

GetReview FZCO,

IFZA Business Park, DDP, Dubai Silicon Oasis,

Dubai, UAE

License number: 26422

Any questions related to this Policy can be mailed to: corp@getreview.io

The current version of the Policy of 01.04.2023