Privacy Policy

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Your privacy is important to us, UCaaS Provider OÜ, a company established and existing under the laws of the Republic of Estonia, has created this statement to let you know about our firm commitment to your privacy and full compliance of Mind™ with General Data Protection Regulation (GDPR). The following discloses our approach in gathering and processing Personal Data for the UCaaS Provider OÜ website https://imind.com and related services. By using our website you explicitly consent to such use of your Personal Data and agree to the terms of this Privacy Policy.

What Personal Data we collect

UCaaS Provider OÜ collects Personal Data (hereinafter also "Data") in case you choose to register with Mind™ service.

We ask users to provide following Data:

- first and last name to identify users and display a unique username in Mind™ accounts ("Accounts"):
- email address to authenticate users, provide access to Accounts and help them recover password to access to Accounts.

Aforementioned Data is collected only upon You either enter particular information or upload it on Your own initiative using site forms.

We also collect following technical data:

- IP address to help diagnose problems with our server and to administer our website
 and to identify you and your time spent at our website to understand which parts of
 our website users are visiting and provide better user experience;
- Location (based on the IP address);
- Operation System and Internet Browser data;
- Hardware specifications (screen size, other specifications):
- Other data. Please refer to "Third-party service providers" section of this Policy and the following link: to learn more.

If you choose not to register or provide Personal Data, you can still use our website anonymously. But you will not be able to access areas that require registration.

Technical data is recorded automatically when you visit our site or use our service and is generally anonymous (does not reveal user's identity). However, if you are logged into your Account some of this information could be associated with your Account.

We do not link IP addresses to anything personally identifiable. This means, for instance, that a user's session will be tracked, but the user will remain anonymous. We do not use this information for any other purposes.

We also collect certain categories of personal information about users from other sources. In particular:

- Financial and/or transaction details from our payment provider Stripe (located in the US) https://stripe.com. This is necessary in order to process a transaction;
- Third-party service providers like Google (located in the US), which provide

information about you when you link, connect, or login to your Mind™ account with your Google Account and we receive information such as your Google e-mail and profile from that service. This only occurs if you are using Google Account to login. The information is controlled by Google and is authorized by you via your privacy settings in Google Account.

How we use Personal Data

We collect and processes Data for the following purposes:

- to provide users with better experience (e.g. to make custom user interface);
- to investigate performance issues, bugs and any other technical issues regarding Resources;
- to make Mind™ better;
- to comply with the law.

UCaaS Provider OÜ may share non-personal, summary information regarding Mind™ users with partners or other third parties. However, we will not share any individual customer information without first receiving user's prior written approval. In short, UCaaS Provider OÜ does not sell user's Personal Data.

UCaaS Provider OÜ may send you tips on using Mind™, notify you of and get your feedback on upcoming releases or new services offered **only** if you subscribed to our mailing lists. Users are able to unsubscribe from the mailing list any time after receiving the first informational message using link contained within informational message or by using appropriate Account settings option.

How long Data is used

We retain your Data for as long as is necessary to provide the service to you and others, and to comply with our legal obligations. Your Data is stored and processed only when your account is active until you delete or deactivate it.

Account can be deleted permanently at any time using the appropriate options in portal settings.

If you chose to delete your Account, it will be permanently deleted within 60 days. In case if your Account is inactive for 180 days, it will be scheduled for removal and permanently deleted after another 60 days. You can ask us to restore Data until it's permanently deleted.

How you can control your Data

You have various rights to control use and processing of your Personal Data and other information. This means that you are entitled to request us to take certain actions at any time and free of charge.

Data portability right. You have the right to request a digital copy of your Data in a structured, commonly used and machine-readable format to be able to move from one service to another.

You can email us at info@mind.com and we will provide you with an electronic file containing your Data.

Right to rectification. You have the right to obtain the rectification of inaccurate Data. You entitled to have incomplete Personal Data completed. In order to do so, please use appropriate settings to edit and complete your incomplete Personal Data if you find it necessary or provide us with a supplementary statement by sending e-mail at info@mind.com

Right to erasure ("Right to be forgotten"). You are eligible to delete certain Data from our site and services.

If you choose to delete your Data, it will become unavailable and will be completely deleted in 60 days upon your delete request.

Please, be aware, that sometimes we have to store some Data for a longer period of time either due to technical limitations or to comply with the law.

Underage

UCaaS Provider OÜ does not intentionally collect Personal Data from persons, who are minors under their applicable local legislation. If you are under 16, you will need consent from your parent(s) or other legal guardian(s) before submitting any information to UCaaS Provider OÜ via the website, with the exception if such activities are allowed by applicable law of your country. If we become aware that a person under 16 has provided us with personal information without appropriate aforementioned consent, we will take steps to delete such information.

Public Areas

UCaaS Provider OÜ may create, host and provide discussion forums, newsgroups, blogs or other public environments to Mind™ users and general public. Any information disclosed in blogs or forums is considered public and each user is responsible for and should exercise caution when disclosing any Personal Data in such areas. UCaaS Provider OÜ is not responsible for any action taken as a result of information presented or received in such areas.

Links to Other Sites

This site contains links to other sites. Please be aware that UCaaS Provider OÜ is not responsible for the privacy practices or the content of such websites as well as any information they might collect, even though our name or logo may appear on those sites. We encourage you to be aware when you leave our site and to read the privacy statements of each and every website that you visit, as the Privacy Policy of those sites may differ from ours. Our privacy statement applies solely to https://imind.com

How we use "Cookies"

Please refer to Cookie Policy.

Data Protection

Your Account is password-protected so that you have secure access to your Mind™ portal and Personal Data stored on your website. It is the user's responsibility to protect the security of their password. We do not take responsibility for any undesirable information disclosure due to password insecurity.

To minimize any personal data breach we implemented following different security measures including:

- user password strength settings;
- strong cipher-encryption for all mediums containing Personal Data;
- activity logs;
- two-factor authentication;
- end-to-end encryption using modern TLS (Transport Layer Security) cryptographic protocol for all connections containing Personal Data;
- other safety measures to reduce the risk of unauthorized access.

Third-party service providers.

We use third-party service providers to provide hosting and analytics.

AWS Amazon file hosting. We use Amazon AWS cloud storage to store user files including Data.

To learn how Amazon AWS treats your privacy, please see the following link.

Google Analytics.

We also use Google Analytics to track what is used the most, to understand our users needs and to make our site and service better.

Please visit the <u>link</u> to understand Google's approach to privacy.

Privacy Policy Updates

UCaaS Provider OÜ may update this Privacy Policy from time to time. We encourage you to review this privacy statement for any changes occasionally. If any changes are made to the way in which we treat your Personal Data, we will inform you about such changes via email or by posting a note on our website.

Further Questions

If you have any questions about our Privacy Policy, feel free to email us at info@mind.com.