

# Streetify Privacy Policy

Last Updated: Saturday, June 2, 2018

## Introduction

This Privacy Policy (the "Policy") is effective May 2018. It summarizes the data and information Streetify might collect, use, maintain, protect, process, or disclose.

Streetify (referred to as "our Company", "we" or "us") provides online businesses (our "Customers") with address verification services, improving their ability to deliver products to online shoppers who transact with them ("Shoppers") and providing them with enhanced control over shipping destinations (collectively, these are our "Services"). Our Services are made possible by the proprietary software application (our "App") we develop and manage. Customers can subscribe to or purchase our Services via <https://streetify.io> (our "Website") or from our e-commerce platform partners' websites (see Data Partners List). Our Website markets to and informs prospective customers and partners, who are generically website visitors ("Visitors"), about our Services, our App and related issues in the e-commerce arena. Streetify values and respects the privacy of our Visitors, Customers and Shoppers (collectively referred to as "you" in this Policy).

This Policy applies to data and information that may come from:

- Our website (<https://streetify.io>) ("Website")
- Application ("App") settings and dashboard for business accounts with Streetify
- Payment processing for business accounts
- E-commerce platforms, which may share additional account information
- E-commerce check-out pages, where shipping addresses and other information may be collected or processed
- Electronic communications, including emails, surveys, texts, chats and pop-up messages

## Definitions

"Personally identifiable information" (PII) means information that can be used to identify you as an individual, such as:

- First name and last name
- Company name
- Email address
- Phone number
- Home, billing, business or shipping address
- Social media posts or content

- User ID
- Password
- Payment information, including bank account, credit card or invoicing information
- Domain name
- Internet protocol (IP) addresses
- Cookie identifiers

“Company Information and Data” (CID) may include:

- Business contact information (phone, email)
- Business social media posts or content
- Business payment information, including bank account, credit card or invoicing information
- Store conversion rates
- Store order volume
- Store abandoned cart rates
- Recipient countries of orders shipped

### **Information Collected**

The type of PII or CID that we may collect from you and how we collect it are described below in three sections: Visitors, Customers and Shoppers.

We collect information about you when you provide it:

- Directly to us, via our Website or our App
- Indirectly to us, via 3rd parties, including e-communication tools (such as online surveys), payment processors, and e-commerce platforms
- Automatically, in order to continue using our services (for example, monthly subscription payments or auto-renew enablement)

We require certain types of PII and CID in order to offer our Services. While you have significant control over your PII and CID and our collection and processing of that information, as described in this Policy, if you elect not to share PII or CID, we reserve the right not to register you as Customer or, subsequently, provide you with our Services. In addition, without the use of some or all of your PII and CID, certain features and functionality of our Services may be limited or unavailable.

#### **Website Visitors**

Due to information collection practices of our customer support data partner, we may collect PII from Website Visitors who initiate communications with us via online messaging. This information may include:

- IP address
- Location
- Device type (desktop, mobile, tablet)
- Browser (e.g., Chrome, Firefox)
- Operating system
- Domain name

We may use this information, individually or in the aggregate, for technical administration of our website(s), research and development, customer and account administration, and to help us focus our marketing efforts more precisely.

Streetify also collects information from Website Visitors via cookies, which may be required or optional for browsing our website. When Visitors arrive at our Website for the first time on a device, they will be asked to accept our cookies, by continuing to browse the Website. Visitors may opt out of non-essential cookies, any cookies not categorized as Necessary (see Cookies section for more information).

Legal Basis: We process this information for our legitimate interest in providing our Services and conducting analytics to improve the performance of our Services and Website.

#### Customers

To create an account with Streetify, in order to utilize our App and Services, Customers must provide us with the following:

- First name and last name
- Business name
- Email address
- Phone number
- Address
- Credit card information for payment

Our e-commerce platform partners (for example, Shopify) may share with us additional information about our Customers' accounts with them. This PII or CID could include the following:

- Streetify installation date
- Business owner name
- Account identification number
- Domain names
- Total Streetify sales
- Currency and money formats

- Taxes: included, host country and shipping
- Google apps domain
- Location: latitude and longitude
- Timezone

If Streetify allows Customers to tag Streetify in social media posts (e.g., Facebook, Instagram) or post on Streetify's Website, any images or text provided by Visitors or Customers will be classified and treated as information that is "manifestly made public".

Legal Basis: We process this information as described in our Use of Information section, for our legitimate interests in providing Services to our Customers. Customers also provide us with this data when they install our App and create an account with Streetify. We are committed to taking all of the measures legally required to protect our Customers' PII and CID and are voluntarily taking extra precautions, as needed, to ensure your data privacy and security.

### Shoppers

Streetify collects the following information from our Customers' online Shoppers:

- First name and last name
- Email address
- Shipping address

Legal Basis: We process this information as described in our Use of Information section, for our legitimate interests in providing the Services to our Customers. No PII or CID are retained (no names or email addresses), once we have fully verified a Shopper's shipping information.

Customers are expected to ensure that their Shoppers are aware of third-party data processors and collectors that they utilize. If a Customer's Shopper would like their PII deleted, they email us at [streetify@shopinet.xyz](mailto:streetify@shopinet.xyz) with the subject line: "Data deletion request - GDPR". If we have the data in our database, we will delete it within two business days.

### Information Prohibitions

Our Website and our App are only intended for use for people over 13 years old. No one under age 13 may provide any PII to or on the Website. We do not knowingly collect PII from children under 13.

If you are under 13 years old, do not use or provide any PII to this Website or App, make any purchases through the Website or App, use any of the interactive or public comment features of this Website or App. We do not want to collect any of the following PII about you: your name, address, phone number, email address, or any screen name or user name you may use.

If we learn that we have collected or received PII from a child under 13 years old without verification of parental consent, we will delete that information within two business days of receiving notification. If you believe we might have information from or about a child under 13 years of age, please contact us at [streetify@shopinet.xyz](mailto:streetify@shopinet.xyz)

## **Legal and Compliance Obligations**

Streetify's operations are located in the United States (U.S.). If you are based outside of the U.S., you agree to use Streetify's website in accordance with both U.S. and international data privacy laws and regulations, including:

- U.S. Department of Commerce's Safe Harbor Framework
- U.S. Children's Online Privacy Protection Act
- U.S. Federal Trade Commission Act
- California Online Privacy Protection Act
- European Union's General Data Protection Requirements (GDPR)

Streetify is voluntarily in the process of working towards full compliance with EU-U.S. Privacy Shield Framework.

## **Use of Information**

Streetify may collect and process your PII and CID to enable our legitimate interests in providing Services and our App to Customers, as well as information about our Services and App to Visitors and Customers.

For our Website Visitors, we may collect or process this information to:

- Respond to your questions and comments electronically
- Analyze market opportunities and prospective customer preferences and issues
- Market our Services to you once you leave our Website

For our Customers, we may collect or process this information to:

- Communicate electronically or by phone, before or after you become a customer, to:
- - Send notifications and information about account administration
  - Respond to or solicit feedback
  - Request online reviews
  - Email marketing communications or blog posts (with your consent)
- Create and maintain your Customer account on our App
- Improve our Services and App

As part of our Services, we indirectly collect Shoppers' email addresses and shipping addresses via our Customers' e-commerce platform providers (see Data Partners List), which makes Streetify a data processor of Shoppers' data. This PII is collected while Shoppers are checking-out online (pre-order submission) and afterwards (post-order submission) in order to:

- Verify shipping addresses submitted by Shoppers, to determine whether they match the formats and data in our postal databases.
- Auto-correct or suggest corrections to shipping address that cannot be verified.
- Assure that Shoppers' shipping addresses satisfy the deliverability criteria set by our Customers
- Email automatic messages to Shoppers when an address is 'unverifiable.'
- Display verification and assurance results on our Customers' Streetify account dashboards.
- Whitelist addresses that postal databases flag as unverified but are deliverable (whitelisting enabled by Customers manually)

If we create anonymous data records from your PII or CID, at our discretion, it is for the purpose of monitoring, improving and updating Streetify's Services, App and marketing efforts.

Anonymized PII or CID may be utilized to enhance the results of analysis, aggregation or communications conducted by third parties. (For example, we aggregate and analyze the countries that our Website Visitors contact us from for the purpose of understanding where market needs are. This anonymous country-level information may be processed by a third-party vendor, like Google Dashboard.)

An example of an anonymized data record are online customer reviews, which may be displayed on our publicly-accessible website, other marketing materials or elsewhere. This anonymized review would include the customer's first name, initial of the last name and country. While the initial feedback may include PII or CID, Streetify will treat your feedback-related PII or CID as confidential, unless otherwise agreed upon by both parties.

### **Data Control and Rights**

This section describes the rights you have with respect to the PII and CID that we may collect and process about you.

#### **Access to Data**

You have the right to request information about the PII and CID we hold about you and to request a copy of that information. For Customers, much of that information is already available via your account with Streetify or your e-commerce platform provider.

#### **Portability**

You may ask for a copy of your PII and CID in a machine-readable format. You can also ask us to transfer your data to another data processor or collector, if technically feasible.

#### **Correction and Deletion**

For Customers, at any time, you may review and change your PII or CID by logging into your account with your e-commerce provider. If you are unable to edit or alter your PII or CID directly with your e-commerce provider or with Streetify, or if you do not currently have an account with us, you may request changes by contacting Streetify directly. You may also request deletion of your PII and CID, if we

collect or process it. If we have direct control over the PII or CID, we will make the changes or deletions requested within two business days. If the PII or CID is not alterable by Streetify but rather by a Customer (in the case of Shoppers' data) or a Data Partner, you must request that party make the changes desired.

#### Withdrawal of Consent

For PII and CID that we collect or process on the basis of your consent, you can choose to withdraw your consent at any time. If you choose to withdraw your consent for Streetify to access your PII or CID, that withdrawal will not affect the legality of processing we may conduct on grounds other than your consent.

#### Limit Processing

You have the right to request that we limit our processing of your PII and CID.

#### File Complaint

You have the right to file a complaint about our collection or processing of your PII and CID with the appropriate supervisory authority in your country.

#### Data Retention

If any Customers choose to discontinue our Services and associated Streetify accounts, our Customers may uninstall our App and remove Streetify's code from their e-commerce store. Customer records will be retained for 30-days from the date of uninstallation. If Customers desire their records be deleted sooner, or immediately upon discontinuation of service, you may request deletion by emailing Streetify at [streetify@shopinet.xyz](mailto:streetify@shopinet.xyz) and including "GDPR : Data deletion request" in the subject line.

#### Third Parties

In order to provide our Services and build and maintain our App, we may receive from or share your PII or CID with third-party vendors or service providers ("Data Partners"). Our Data Partners all have their own processes, policies and practices for providing data security and privacy.

Streetify will not disclose your PII or CID except:

- as necessary to provide services you have paid for or requested;
- as described in this Policy, or in other ways for which you have otherwise consented;
- in the aggregate with other information in such a way so that your personal identity cannot reasonably be determined (for example: statistical compilations);
- as required by law (for example: in response to a subpoena or search warrant);
- to auditors who agree to keep the information confidential;
- as necessary to enforce the Terms of Use;

- as necessary to protect the rights, safety, or property of Streetify, its Visitors, Customers, Shoppers, or others (for example: exchanging information regarding fraud protection or risk reduction).

If you provide PII or CID to Streetify, directly or through any of our Data Partners, we will:

- Not sell it to a third-party without your express permission
- Request your permission, either directly or through a Data Partner, to send you marketing communications
- Take reasonable precautions to protect the PII or CID from loss, misuse and unauthorized access, disclosure, alteration and destruction

Streetify may disclose PII or CID if it believes in good faith that such disclosure is necessary to (a) comply with relevant laws or to respond to subpoenas or warrants served to Streetify; or (b) protect or defend the rights or property of Streetify or our Customers.

In the future, Streetify may have subsidiaries, joint ventures, or other companies under a common control (collectively, "Related Entities"), and we may share some or all of your PII or CID with these Related Entities. Before doing so, we would provide you with an opportunity to consent and would require Related Entities to honor this Policy.

Streetify could sell, divest or transfer the Company (including shares in the Company), or any combination of its products, services, assets and/or businesses in the future. In such an event, PII or CID may be sold or otherwise transferred. In advance, we would notify our Customers by email and provide public notice of changes in ownership, as soon as reasonably practical. We would share the options that you may have regarding sharing or withholding your PII and CID. We could potentially sell, assign or otherwise transfer such information in the course of corporate divestitures, mergers, acquisitions, bankruptcies, dissolutions, reorganizations, liquidations, similar transactions or proceedings involving all or a portion of the company.

This Policy does not govern the collection and use of PII or CID by companies or entities that Streetify does not control, nor does the Policy govern PII or CID shared with individuals who are not employed, contracted or directly managed by Streetify. For example, if you visit a website that Streetify mentions or links to, it is your responsibility to review its policies before providing those entities your PII or CID.

## **Security**

Streetify is committed to protecting the security of your PII or CID. We implement industry-standard security protocols, processes and practices to guard against unauthorized access, use, or disclosure of your PII, CID or other Customer account information.

To maintain the security of your data and your online sessions, our security measures include:

- Industry-standard firewalls
- Secure web servers (https)
- Secure sockets layer (SSL)



- Data encryption and authentication procedures

### **Cookies Statement**

Cookies are small data files containing a string of characters that are transferred by a website to your computer's hard drive or mobile device. Cookies are used for a variety of reasons including security and to personalize our website for you. Websites must get consent to send cookies or tags, unless they are required aspects of the service they provide.

Streetify uses OneTrust ([www.onetrust.com](http://www.onetrust.com)) to obtain user consent as well as monitor and control cookies on our Website. The types, names and purposes of the cookies we use are below.

#### Strictly Necessary Cookies

These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the site will not then work. These cookies do not store any personally identifiable information.

#### Cookies used

- OptanonConsent
- OptanonAlertBoxClosed
- ARRAffinity

#### Performance Cookies

These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies we will not know when you have visited our site, and will not be able to monitor its performance.

#### Cookies used

- \_gid
- \_ga

### **Your Responsibilities**

To help protect your privacy, we strongly recommend that you:

- Do not to share login details for accounts managing our Services
- Log-off from your accounts between sessions,
- Take customary precautions to guard against "malware" (viruses, Trojan horses, bots, etc.), for example by installing and updating suitable anti-virus software.

**Changes to this Privacy Policy**

Streetify reserves the right to change this Privacy Policy as we deem necessary or appropriate because of legal compliance requirements or changes in our business practices. We will notify our Customers of any substantial updates or edits.

**Questions?**

If you have questions or comments about our Privacy Policy, please email us at [streetify@shopinet.xyz](mailto:streetify@shopinet.xyz), or contact us via our Website.

We value your business, respect your privacy and thank you for choosing Streetify.