

# Privacy Policy

**Last modified: January 11th 2020**

CvvCart is a platform designed to make it easy for businesses and marketers to create engaging checkout pages and deliver their products and services to you, their customer.

We are committed to protecting your privacy, and this policy explains how we collect and process personal information about you when you visit our website (CvvCart.com), when you use our products and services (our “Services”), or when you otherwise do business or make contact with us.

Please read this policy carefully to understand how we handle your personal information.

## **What information do we collect?**

We may collect and process the following personal information from you:

Information you provide to us: We collect personal information when you voluntarily provide us with such information in the course of using our website or Services. For example, when you register to use our Services, we will collect your name, email address, password, organization information, and billing details. We also collect personal information from you when you subscribe to our newsletter, or respond to a survey. If you make an enquiry through our website, or contact us in any other way, we will keep a copy of your communications with us. Information we collect when you do business with us: We may process your personal information when you do business with us – for example, as a customer or prospective customer, or as a vendor, supplier, consultant, or other third party. For example, we may hold your business contact information and financial account information (if any) and other communications you have with us for the purposes of maintaining our business relations with you. Information we automatically collect: We may also collect certain technical information by automatic means when you visit our website, such as IP address, browser type and operating system, referring URLs, your use of our website, and other clickstream data. We collect this information automatically through the use of various technologies, such as cookies. Personal information where we act as a data processor: We also process personal information on behalf of our customers in the context of supporting our products and services. Where a customer subscribes to our Services, they will be the ones who control what data is collected and stored on our systems. For example, they may ask us to request from you basic user data (e.g., email address), but may request more detailed information (e.g. your billing address). In such cases, we are data processors acting in accordance with the instructions of our customers. You will need to refer to the privacy policies of our customers to find out more about how such information is handled by them. What do we use your information for?

The personal information we collect from you may be used in one or more of the following ways:

To deal with enquiries, requests and technical support (your information helps us respond to your individual needs)  
To create and administer records about any online account that you register with us  
To provide you with information and access to resources that you have requested from us  
To improve our website (we continually strive to improve our website offerings based on the information and feedback we receive from you), including to improve the navigation and content of our sites  
For website and system administration and security  
For general business purposes, including to improve customer service (your information helps us to more effectively respond to your customer service requests and support needs), to help us improve the content and functionality of our Services, to better understand our users, to protect against wrongdoing, to enforce our Terms of Service, and to generally manage our business  
To process transactions and to provide Services to our customers and end-users  
For recruitment purposes, in the event you apply for a job with us  
To administer contests, promotions, surveys, or other content across our site  
To send periodic transactional emails. The email address you provide to process your order and purchase a product will only be used to send you information and updates pertaining to your order. Where it is in accordance with your marketing preferences, we will send occasional marketing emails about our products and services, which you can unsubscribe from at any time using the link provided in the message  
How do we protect your information?

We implement a variety of security measures to maintain the safety of your personal information when you enter, submit, or access your personal information. We offer the use of a secure server. All supplied sensitive/credit information is transmitted via Secure Socket Layer (SSL) technology and then encrypted into our Payment gateway providers database only to be accessible by those authorized with special access rights to such systems, and are required to keep the information confidential. During and after a transaction, none of your private information (e.g., credit card numbers, social security numbers, financials) are transmitted to nor stored on our servers.

### **Do we use cookies?**

Yes. Please see our cookie policy for more information.

### **Do we disclose any information to outside parties?**

We will only share your information with third parties in certain circumstances:

We engage certain trusted third parties to perform functions and provide services to us, including cloud hosting services, off-site backups, email service providers, and customer support providers. We will only share your personal information with third parties to the extent necessary to perform these functions, in accordance with the purposes set out in this Privacy Policy and applicable laws. In the event of a corporate sale, merger, reorganization, dissolution,

or similar event, your personal information may be sold, disposed of, transferred, or otherwise disclosed as part of that transaction. We may also disclose information about you to third parties where we believe it necessary or appropriate under law, for example: (1) to protect or defend our rights, interests, or property or that of third parties; (2) to comply with legal process, judicial orders, or subpoenas; (3) to respond to requests from public or government authorities, including for national security and law enforcement purposes; (4) to prevent or investigate possible wrongdoing in connection with the Services or to enforce our Terms of Service; (5) to protect the vital interests of our users, customers, and other third parties. We may use and share aggregated non-personal information with third parties for marketing, advertising, and analytics purposes.

We do not sell or trade your personal information to third parties.

As noted, the CvvCart platform creates and hosts checkout pages for our customers. When visiting such pages, we are data processors acting in accordance with the instructions of our customers. You will need to refer to the privacy policies of our customers to find out more about how such information is handled by them.

### **Third Party Links**

Occasionally, at our discretion, we may include or offer third party products or services on our website. If you access other websites using the links provided, the operators of these websites may collect information from you that will be used by them in accordance with their privacy policies. These third party sites have separate and independent privacy policies. We, therefore, have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

### **International Transfers**

If you are visiting our website or using our Services from outside the United States (U.S.), please be aware that you are sending personal information to the U.S. where our servers are located. The U.S. may not have data protection laws that are as comprehensive or protective as those in your country of residence. However, our collection, storage, and use of your personal information will at all times be in accordance with this Privacy Policy.

### **EU-U.S. Privacy Shield**

As a USA-based company, we are not able to self-certify under the EU-U.S Privacy Shield framework, however, we have committed publicly to an equivalent agreement. More details of this commitment can be found [here](#).

### **Your Rights**

If you are from the EU, you may have the right to access a copy of the personal information we hold about you, or to request the correction, amendment, or deletion of such information where it is inaccurate or processed in violation of the principles of the Privacy Shield framework. To make such a request, please contact us at the contact details at the bottom of this document.

We will consider and respond to your request in accordance with the Privacy Shield equivalent framework and applicable laws.

Furthermore, we commit to giving you an opportunity to opt-out if your personal information is to be disclosed to any other independent third parties, or to be used for a purpose materially different from those that are set out in this Privacy Policy. Where sensitive personal information is involved, we will always obtain your express opt-in consent to do such things. If you otherwise wish to limit the use or disclosure of your personal information, please write to us at the contact details at the bottom of this document.

You can also unsubscribe from our marketing communications at any time by following the instructions or unsubscribe mechanism in the email message itself.

### **Data Retention**

We may retain your personal information as long as you continue to use the Services, have an account with us, or for as long as is necessary to fulfil the purposes outlined in the policy. You can ask to close your account by contacting us at the details at the bottom of this document, and we will delete your personal information on request.

We may, however, retain personal information for an additional period as is permitted or required under applicable laws, for legal, tax, or regulatory reasons, or for legitimate and lawful business purposes.

### **Changes to our Privacy Policy**

If we decide to change or update our privacy policy, we will post those changes to this page, and update the Privacy Policy modification date at the top of this document.

### **Contacting us**

You may contact our support staff by clicking [here](#) and going to this submission page or by emailing [support@CvvCart.com](mailto:support@CvvCart.com). We endeavour to respond to all messages within 24 hours, but depending on the nature of your request, it may take longer.

