

Privacy Policy

This Privacy Policy was posted on 08/10/2021 by Felix Store Ltd, a Karta company, which may be referred to herein as “we”, “us” or “our”. The privacy of our users is important to us. It is our policy to respect privacy of our users regarding any information we may collect through our website karta.io (hereinafter, “**our Website**”). This Policy reflects our intent to comply with the EU General Data Protection Regulation (GDPR) standards.

Information Collected

Log data

Whenever users visit our Website, servers providing functionality for our Website may automatically log the standard data provided by user web browser. Such data is considered “non-identifying information”, as it does not contain anything that is capable of identifying any user personally. The standard data may include user computer’s IP address, the type of browser used, the pages visited, the time and date of visit and the time spent on each page of our Website.

We collect personal information when users request information about our services and products, request delivery of information, schedule an event or otherwise voluntarily provide such information through our Website or otherwise. This information may include any of the following:

- personal contact information, such as name, phone number and email address; and
- services and products any particular user may be interested in purchasing

Generally, every user will have control over the amount and type of information he or she provides to us when using our Website.

Personal Information

We may ask users to provide personal information, such as:

- Name, surname;
- Phone number;
- Email address;
- Company name;
- Role with the company;
- Company size;
- Country of residence.

Payment Information

This data is considered “identifying information”, as it can personally identify users. We only request personal information relevant to providing users with our service, and only use it to help provide or improve this service.

How Information Is Collected

We collect information by lawful means, with user knowledge and consent. We also let users know why we are collecting information about users and how it will be used. Users are free to refuse our request, with the understanding that, if our request is refused, we may be unable to provide the refusing user with some of the services and functionality available on our Website.

How Information Is Used

We may use the collected information, both identifying and non-identifying, to understand who our users are, how they use our services, and how we may enhance their experience of our Website. We do not disclose any such information publicly.

When we use or process personal information about users, we do so only as necessary to provide services to users (e.g., to meet our contractual and legal obligations), or otherwise with user consent, to comply with applicable law, or to fulfill other legitimate interests. Through our Website, all users are provided with the choice of which types of communications users will receive from us, and the ability to change those choices whenever users want. Some of the more common, specific uses of the information provided by users are described below.

Providing Services; Fulfilling Contractual Obligations

We may use personal information to provide the services requested by users or to otherwise perform any contract we may have with users, including communicating with users about the scope of work, payment or other related topics. When user account is set up on our Website or user otherwise agrees to the terms and conditions of our Website, a contract is formed between the particular user and us. In order to carry out that contract, we must process the information provided to us by user. Some of the information provided by users may contain personal information, and we may use it in order to do any of the following:

- verify user identity for security purposes;
- provide user with suggestions and advice concerning our services;
- provide our services, which includes updating, securing and troubleshooting, as well as providing support; and/or
- improve, personalize and develop our services.

We will continue to process this information until the contract between user and us ends or is terminated by either party under the terms of the contract.

Processing of Information Subject to User Consent

Through certain actions when otherwise there is no contractual relationship between user and us, such as when, after having browsed our Website, user requests us to provide more information about our business, including about our services, we may request user to provide consent to us in order to process information that may be personal information.

Wherever practicable, we aim to obtain explicit user consent to process personal information. Sometimes user might give consent implicitly, such as when user sends us a message containing personal information by email to which user expects us to reply.

When we communicate with users about our business, we will use the contact information provided to us to discuss technical issues, services, and other information of interest to users. We may also send users email messages containing useful information and promotional information about our business. Except where a particular user has consented to our use of user information for a specific purpose, we will not use any of user's information in any way that would identify the user personally.

We will continue to process user information on this basis until user withdraws consent or it can be reasonably assumed that user consent is no longer valid.

Each user may withdraw consent at any time by instructing us using the contact information at the end of this Policy, using unsubscribe instructions provided in communications, or changing user elections within our Website. However, if user does so, he or she may no longer be able to use our Website or our services.

Legally Required Disclosure of Information

We may be legally required to disclose user personal information, if such disclosure is:

- required by subpoena, law, or other legal process;
- necessary to assist law enforcement officials or governmental authorities;
- necessary to investigate violations of or otherwise enforce our Terms and Conditions of Use;
- necessary to protect us from legal action or claims from third parties including users; and/or
- necessary to protect the legal rights, personal/real property, or personal safety of our company, customers, third party partners, employees, and affiliates.

Other Legitimate Interest

We may process information or use it to communicate with users on the basis that doing so is necessary to achieve a legitimate interest, either to a particular user or to us. Where we use user information on this basis, we do so after having given careful consideration to:

- whether the same objective could be achieved through other means;
- whether processing (or not processing) might cause a particular user any harm;
- whether the user would expect us to process his or her data, and whether the user would consider it reasonable to do so;

For example, we may process user data or communicate with the user for any of the following purposes:

- operating our business, which includes analyzing our performance, meeting our legal obligations, developing our workforce, and conducting research;
- record-keeping for the proper and necessary administration of our business;
- responding to user complaints or service requests;
- protecting and asserting the legal rights of any party;

- insuring against or obtaining professional advice that is required to manage business risk; and/or
- protecting the interests of any particular user where we believe we have a duty to do so.

We will continue to use this information for this purpose until the legitimate interest no longer exists or such use is not necessary to achieve the legitimate interest.

Data Processing and Data Storage

The personal information we collect is stored and processed in USA. We only transfer user data within jurisdictions subject to data protection laws that reflect our commitment to protecting the privacy of our users.

We only retain personal information for as long as necessary to provide our services. While we retain personal information, we will protect it by applying commercially acceptable means to prevent loss or theft, as well as unauthorized access, disclosure, copying, use or modification. That having been said, we would like to remind users that no method of electronic transmission or storage is 100% secure, and we cannot guarantee absolute security of personal information.

Whenever users request us to delete their personal information, or where user personal information is no longer relevant to our operations, we will erase it from our system within a reasonable timeframe.

Use of Cookies

Like many other websites, we use "Cookies." A Cookie is a small piece of data stored on user computer or mobile device by user's web browser. We may automatically record information when users visit our Website, including the URL, IP address, browser type and language, visitor activity on our Website, details of the websites visited before or after users visit our Website, pages viewed and activities undertaken whilst using our services, the date and time of user visit. We use this information to analyze trends among our users to help improve our Website or customize communications and information that users receive from us. We also use cookies to enhance user online experience by eliminating the need to log in multiple times for specific content.

We use "cookies" to collect information about our users and user activity on our Website. A cookie is a small file that our Website stores on user computers, and accesses each time user visits, so we can understand how user uses our Website. This helps us serve users content based on preferences they have specified. Please refer to our Cookie Policy for more information.

Our Website uses Google Analytics, a web analytics service provided by Google, Inc. Google Analytics uses "cookies," which are text files placed on user computer, to help us analyze how our users use our Website. The information generated by the cookie about user activity on our Website is transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating use of our Website, compiling reports on user activity for website operators and providing other services relating to internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google does not associate IP address with any other data held by Google. Each user of our Website may refuse the use of cookies by selecting the appropriate settings on his or her browser, however users who do this may not be able to use the full

functionality of our Website. By using our Website, users consent to the processing of data about them by Google in the manner and for the purposes set out above.

To provide visitors of our Website with the ability to prevent their data from being used by Google Analytics, Google has developed the Google Analytics opt-out browser add-on. Users who wish to opt-out should download and install the add-on for their web browser. The Google Analytics opt-out add-on is designed to be compatible with Chrome, Safari, Firefox and Microsoft Edge. In order to function, the opt-out add-on must be able to load and execute properly on user browser. Users may want to learn more about the opt-out and how to properly install the browser add-on by accessing this link: <https://support.google.com/analytics/answer/181881?hl=en>

Payment Processing

Payment processing services may personal information of our users solely for the purpose of performing specific tasks on our behalf. We do not share any personally identifying information with them without explicit consent of our users. We do not give payment processors permission to disclose or use any of our data for any other purpose.

We will refuse government and law enforcement requests for personal information if we believe a request is too broad or unrelated to its stated purpose. However, we may decide to cooperate if we believe the requested information is necessary and appropriate to comply with legal process, to protect our own rights and property, to protect the safety of the public and any person, to prevent a crime, or to prevent what we reasonably believe to be illegal, legally actionable, or unethical activity.

We do not otherwise share or supply personal information to third parties. We do not sell or rent personal information of our users to marketers or third parties.

Third Party Sites

This Policy only relates to our Website and does not extend to user activity on the Internet outside our Website; in particular, it does not relate to any websites to which users may link using the hypertext connections within our Website and we are not responsible for the privacy practices of other websites.

Users are encouraged to read the privacy policies or privacy statements of the other websites from which they visit our Website to be aware of their data privacy practices.

Requesting, Amending or Deleting Personal Information

Access to user personal information

Any user may review certain information that we hold about him or her by signing in to user account on our Website. To obtain a copy of all information we maintain about a particular user, that user may send us a request using the contact information at the end of this Policy. After receiving user request, we will tell when we expect to provide the user with the requested information.

Removal or change of user information

If a user wishes us to remove or change personal information that he or she has provided us, the user may contact us at the contact information at the end of this Policy. However, the removal or change of user information may limit the service we can provide.

Verification of information

When we receive any request to access, edit or delete personal information, we will first take reasonable steps to verify user identity before granting access or otherwise taking any action. This is important to safeguard user information.

Retention period for personal data

Except as otherwise mentioned in this Policy, we keep user personal information only for as long as required by us:

- to provide a particular user with the services he or she has requested, or otherwise to perform or enforce our contract;
- to continue to provide the best possible user experience to visitors who return to our Website to collect information;
- to comply with other law, including for any period demanded by tax authorities; and/or
- to support a claim or defense in any court or in any legal, regulatory or administrative proceeding.

Security

We have implemented appropriate technical and organizational security measures to protect the personal information of our users in our care, both during transmission and once we receive it. This includes physical and technical security measures to protect our data from accidental or unlawful destruction, loss, or alteration, and from unauthorized disclosure or access. However, users should be aware that no method of transmitting information over the Internet or storing information is completely secure.

Limits of this Policy

This privacy policy only covers our own collecting and handling of data. We only work with partners, affiliates and third-party providers whose privacy policies align with ours, however we cannot accept responsibility or liability for their respective privacy practices.

Our Website may link to external sites that are not operated by us. Please be aware that we have no control over the content and policies of those sites, and cannot accept responsibility or liability for their respective privacy practices.

Changes to this Policy

At our discretion, we may change our privacy policy to reflect current acceptable practices. We will take reasonable steps to let users know about changes via our Website. Continued use by users of our Website after any changes to this policy will be regarded as acceptance of our practices around privacy and personal information.

User Rights and Responsibilities

As our user, you have the right to be informed about how your data is collected and used. You are entitled to know what data we collect about you, and how it is processed. You are entitled to correct and update any personal information about you, and to request that such information be deleted. You may amend or remove your account information at any time, using the tools provided in your account control panel.

You are entitled to restrict or object to our use of your data, while retaining the right to use your personal information for your own purposes.

Please feel free to contact us if you have any concerns or questions about how we handle your data and personal information.

support@karta.io

This policy is effective as of 08/10/2021.