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Update
Who we are

CargoPlanning.com is a trademark of SC NIMA SOFTWARE SRL, identified by VAT Number: RO34150371, Registry of Commerce No. J22/314/2015, with headquarters in Romania, Iasi, Str. Elena Doamna 20 - 22.

At cargoplanning.com we consider the privacy of our visitors to be extremely important. This privacy policy document describes in detail the types of personal information is collected and recorded by cargoplanning.com and how we use it.

We DO NOT sell your personal information to no third party, such as marketing companies.

Some information is shared with third parties for the sole purpose of monitoring and improving the system, but no personal or identifiable information is shared without your consent.

This privacy policy applies to all websites on the domain cargoplanning.com, including but not limited to www.cargoplanning.com, www.app.cargoplanning.com, etc.

Contact

If you require any more information or have any questions about our privacy policy, please feel free to contact us by email at privacy@cargoplanning.com.

For other questions regarding our Services we can be contacted via email at support@cargoplanning.com or through our online chat.

What is personal data?

The new General Data Protection Regulation (GDPR) defines what is meant by personal data:

“any information relating to an identified or identifiable natural person (hereinafter referred to as the “data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person; [...]”

A transfer of data to third parties occurs only when required by law. We will only pass user’s data on to third parties if, for example, this becomes necessary for contractual purposes or based on legitimate interests or for the economic and effective operation of our business. We would like to point out that data transmission via the internet (for example, in communication via e-mail) can be subject to security breaches. On the Internet, however, IP addresses are used and cookies are set. By using our website, you hereby consent to our privacy policy and agree to its terms.
Log Files

Like many other Web sites, cargoplanning.com makes use of log files. These files merely logs visitors to the site - usually a standard procedure for hosting companies and a part of hosting services's analytics. The information inside the log files includes internet protocol (IP) addresses, browser type, Internet Service Provider (ISP), date/time stamp, referring/exit pages, and possibly the number of clicks. This information is used to analyze trends, administer the site, track user's movement around the site, and gather demographic information. IP addresses, and other such information can be linked to any information that is personally identifiable for the sole purpose of identifying and fixing bugs in production environments.

Data collected:
- IP address of the requesting computer,
- Date and time of access,
- Name and URL of the retrieved file,
- Website from which access is made (referrer URL),
- Browser used and, if applicable, the operating system of your computer as well as the name of your internet service provider.

The data given is processed by us for the following purposes:
- Ensuring smooth connection to the website,
- Ensuring ease of use of our website,
- Evaluation of system security and stability
- Additional administrative purposes.

Log files are stored for 14 days.

Database Logs

CargoPlanning stores an audit regarding all operations performed by each user in the platform. This audit is stored in the database and it used to have a history of each entity. For example, if an user needs to know who changed some information on a shipment 3 days ago, he could read it from the audit.

The audit of any information is currently kept for minimum of 1 year, but can be kept longer depending on the requirements of each customer.

Cookies and Web Beacons

cargoplanning.com uses cookies to store information about visitors' preferences, to record user-specific information on which pages the site visitor accesses or visits, and to personalize or customize our web page content based upon visitors' browser type or other information that the visitor sends via their browser.

Cookies are small text files that can be used by websites to make a user's experience more efficient.
This site uses different types of cookies. Some cookies are placed by third party services that appear on our pages.

**How do we use them?**

**Where strictly necessary.**
These cookies and other technologies are essential in order to enable the Services to provide the feature you have requested, such as remembering you have logged in.

**For functionality.**
These cookies and similar technologies remember choices you make such as language or search parameters. We use these cookies to provide you with an experience more appropriate with your selections and to make your use of the Services more tailored.

**For performance and analytics.**
These cookies and similar technologies collect information on how users interact with the Services and enable us to improve how the Services operate. For example, we use Google Analytics cookies to help us understand how visitors arrive at and browse our products and website to identify areas for improvement such as navigation, user experience, and marketing campaigns.

**Social media cookies.**
These cookies are used when you share information using a social media sharing button or “like” button on our websites or you link your account or engage with our content on or through a social media site. The social network will record that you have done this. This information may be linked to targeting/advertising activities.

**Targeting Cookies or Advertising Cookies.**
We do not use such cookies. CargoPlanning is an add-free service.

You can at any time change or withdraw your consent on our website by using specific options available for your browser.

In case you wish to delete the cookies installed on your device and to configure your browser or refuse cookies in the future you can set up your preferences in your browser options. Usually this settings are found in the menus named “Options”, “Settings”, “Preferences”, but this can differ from browser to browser. For more information on how to disable cookies please read the guide specific to your browser:

[Cookie settings Internet Explorer – Internet Explorer;](#)
[Cookie settings in Firefox – Firefox;](#)
You will not be able to opt-out of any cookies or other technologies that are “strictly necessary” for the Services.

To learn more about cookies please visit www.allaboutcookies.org or www.youronlinechoices.eu, which provides extra information regarding online private life.

**Third Parties**

CargoPlanning uses third party services to improve the quality of it’s service. Each of the third party has its own privacy policy which you should read and agree to it.

Third party services used by CargoPlanning are Google Analytics, Google Maps, New Relic, Tawk.to and MouseFlow

We have no or limited control on third parties cookies.

Google Analytics it’s used to identify users behaviour and geolocation. We need geolocation to identify malicious activity coming from countries outside of our regions of interest.

Google Maps it’s used to provide routing and distance computing services. No personal or identifiable data is being sent to Google Maps.

New Relic is a system monitoring provider and it is used to monitor the overall system performances. No personal or identifiable is being sent to New Relic.

Tawk.To is the support system that allows you to get in touch with us by chat directly in the system. We send to Tawk.To only your name, email and company name if you are logged in. If you are not logged in, the chat will firstly request your name and email. This information is mandatory for us to be able to offer support.

MouseFlow is a system which helps us track users activity in the system and to identify user interface issues. All personal data that might be captured by this service is anonymized automatically. For more details please read their privacy policy.

**Third Party Privacy Policies**

You should consult the respective privacy policies of these third-party servers for more detailed information on their practices as well as for instructions about how to opt-out of certain practices.
cargoplanning.com's privacy policy does not apply to, and we cannot control the activities of, such other service providers or web sites. You may find a comprehensive listing of these privacy policies and their links here: Privacy Policy Links.

If you wish to disable cookies, you may do so through your individual browser options. More detailed information about cookie management with specific web browsers can be found at the browsers' respective websites. What Are Cookies?

What we collect about you in other ways than cookies

We collect information about you when you provide it to us, when you use our Services, and when other sources provide it to us, as further described below.

Information you provide to us

We collect information about you when you input it into the Services or otherwise provide it directly to us.

Account and Profile Information:

We collect information about you when you register for an account, create or modify your profile, set preferences, sign-up for or make purchases through the Services. For example, you provide your contact information and, in some cases, billing information when you register for the Services. You also have the option of adding a company logo and other details to your profile information to be displayed in our Services. We keep track of your preferences when you select settings within the Services.

Content you provide through our products:

The Services include the CargoPlanning products you use, where we collect and store content that you post, send, receive and share. This content includes any information about you that you may choose to include. Examples of content we collect and store include: When you enter a contact person to an itinerary, or filling in the details of a shipment including but not limited to price, itinerary, pickup and dropoff dates, etc.

Content you provide through our websites:

The Services also include our websites owned or operated by us. We collect other content that you submit to these websites, which include social media or social networking websites operated by us. For example, you provide content to us when you provide feedback or when you participate in any interactive features, surveys, contests, promotions, sweepstakes, activities or events.

Information you provide through our support channels:

The Services also include our customer support, where you may choose to submit information regarding a problem you are experiencing with a Service. Whether you designate yourself as a technical contact, open a support ticket, speak to one of our representatives directly or otherwise engage with our support
team, you will be asked to provide contact information, a summary of the problem you are experiencing, and any other documentation, screenshots or information that would be helpful in resolving the issue.

Payment Information:
We collect certain payment and billing information when you register for certain paid Services. For example, we ask you to designate a billing representative, including name and contact information, upon registration. In the future you might also provide payment information, such as payment card details, which we will collect via secure payment processing services.

Information we collect automatically when you use the Services
We collect information about you when you use our Services, including browsing our websites and taking certain actions within the Services.

Your use of the Services:
We keep track of certain information about you when you visit and interact with any of our Services. This information includes the features you use; the links you click on; the type, size and filenames of attachments you upload to the Services; frequently used search terms; and how you interact with others on the Services. We also collect information about the teams and people you work with and how you work with them, like who you collaborate with and communicate with most frequently.

Device and Connection Information:
We collect information about your computer, phone, tablet, or other devices you use to access the Services. This device information includes your connection type and settings when you install, access, update, or use our Services. We also collect information through your device about your operating system, browser type, IP address, URLs of referring/exit pages, device identifiers, and crash data. We use your IP address and/or country preference in order to approximate your location to provide you with a better Service experience. How much of this information we collect depends on the type and settings of the device you use to access the Services. Server and data center Service administrators can disable collection of this information via the administrator settings or prevent this information from being shared with us by blocking transmission at the local network level.

Cookies and Other Tracking Technologies:
CargoPlanning and our third-party partners, such as our advertising and analytics partners, use cookies and other tracking technologies (e.g., web beacons, device identifiers and pixels) to provide functionality and to recognize you across different Services and devices. For more information, please see our Cookies and Web Beacons section, which includes information on how to control or opt out of these cookies and tracking technologies.
Information we receive from other sources

We receive information about you from other Service users, from third-party services, from our related companies, and from our business and channel partners.

Other users of the Services:

Other users of our Services may provide information about you when they submit content through the Services. For example, you may be mentioned in a shipment created by someone else. We also receive your email address from other Service users when they provide it in order to invite you to the Services. Similarly, an administrator may provide your contact information when they designate you as the billing or technical contact on your company's account.

Other Partners:

We receive information about you and your activities on and off the Services from third-party partners, such as advertising and market research partners who provide us with information about your interest in and engagement with, our Services and online advertisements.

How we use information we collect

How we use the information we collect depends in part on which Services you use, how you use them, and any preferences you have communicated to us. Below are the specific purposes for which we use the information we collect about you.

To provide the Services and personalize your experience:

We use information about you to provide the Services to you, including to process transactions with you, authenticate you when you log in, provide customer support, and operate and maintain the Services. For example, we use the name and picture you provide in your account to identify you to other Service users. Our Services also include tailored features that personalize your experience, enhance your productivity, and improve your ability to collaborate effectively with others by automatically analyzing the activities of your team to provide search results, activity feeds, notifications, connections and recommendations that are most relevant for you and your team. For example, we may use your stated job title and activity to return search results we think are relevant to your job function. We also use information about you to connect you with other team members seeking your subject matter expertise. We may use your email domain to infer your affiliation with a particular organization or industry to personalize the content and experience you receive on our websites. Where you use multiple Services, we combine information about you and your activities to provide an integrated experience, such as to allow you to find information from one Service while searching from another or to present relevant product information as you travel across our websites.
For research and development:
We are always looking for ways to make our Services smarter, faster, secure, integrated, and useful to you. We use collective learnings about how people use our Services and feedback provided directly to us to troubleshoot and to identify trends, usage, activity patterns and areas for integration and improvement of the Services.

To communicate with you about the Services:
We use your contact information to send transactional communications via email and within the Services, including confirming your purchases, reminding you of subscription expirations, responding to your comments, questions and requests, providing customer support, and sending you technical notices, updates, security alerts, and administrative messages. We send you communications as you onboard to a particular Service to help you become more proficient in using that Service. These communications are part of the Services and in most cases you cannot opt out of them. If an opt out is available, you will find that option within the communication itself or in your account settings.

To market, promote and drive engagement with the Services:
We use your contact information and information about how you use the Services to send promotional communications that may be of specific interest to you, including by email and by displaying CargoPlanning ads on other companies’ websites and applications, as well as on platforms like Facebook and Google. These communications are aimed at driving engagement and maximizing what you get out of the Services, including information about new features, survey requests, newsletters, and events we think may be of interest to you. We also communicate with you about new product offers, promotions and contests. You can control whether you receive these communications by unsubscribing using the links provided in the communication.

To generate statistics:
We use the information you provide through the platform to generate statistics that are of interest for the logistics market in general, but also for our internal business analysis process. An example of such a report might be the total value of shipments on a particular route for a certain period of time. This statistics can be used in newsletters, ads, marketing and business events or displayed on our public website.

Under no circumstance will we ever display personal or identifiable information when building such statistics without your consent.

Customer support:
We use your information to resolve technical issues you encounter, to respond to your requests for assistance, to analyze crash information, and to repair and improve the Services.

For safety and security:
We use information about you and your Service use to verify accounts and activity, to monitor suspicious or fraudulent activity and to identify violations of Service policies.
To protect our legitimate business interests and legal rights:
Where required by law or where we believe it is necessary to protect our legal rights, interests and the interests of others, we use information about you in connection with legal claims, compliance, regulatory, and audit functions, and disclosures in connection with the acquisition, merger or sale of a business.

With your consent:
We use information about you where you have given us consent to do so for a specific purpose not listed above. For example, we may publish testimonials or featured customer stories to promote the Services, with your permission.

Legal bases for processing (for EEA users):
If you are an individual in the European Economic Area (EEA), we collect and process information about you only where we have legal bases for doing so under applicable EU laws. The legal bases depend on the Services you use and how you use them. This means we collect and use your information only where:

We need it to provide you the Services, including to operate the Services, provide customer support and personalized features and to protect the safety and security of the Services;
It satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote the Services and to protect our legal rights and interests;
You give us consent to do so for a specific purpose; or
We need to process your data to comply with a legal obligation.

If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we or a third party (e.g. your employer) have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using the Services.

Other important privacy information
Notice to End Users

Many of our products are intended for use by organizations. Where the Services are made available to you through an organization (e.g. your employer), that organization is the administrator of the Services and is responsible for the accounts and/or Service sites over which it has control. If this is the case, please direct your data privacy questions to your administrator, as your use of the Services is subject to
that organization’s policies. We are not responsible for the privacy or security practices of an administrator’s organization, which may be different than this policy.

Administrators are able to:

- require you to reset your account password;
- restrict, suspend or terminate your access to the Services;
- access information in and about your account;
- access or retain information stored as part of your account;
- install or uninstall third-party apps or other integrations

In some cases, administrators can also:

- restrict, suspend or terminate your account access;
- change the email address associated with your account;
- change your information, including profile information;
- restrict your ability to edit, restrict, modify or delete information

Even if the Services are not currently administered to you by an organization, if you use an email address provided by an organization (such as your work email address) to access the Services, then the owner of the domain associated with your email address (e.g. your employer) may assert administrative control over your account and use of the Services at a later date. You will be notified if this happens.

Please contact your organization or refer to your administrator’s organizational policies for more information.

Our policy towards children

The Services are not directed to individuals under 16. We do not knowingly collect personal information from children under 16. If we become aware that a child under 16 has provided us with personal information, we will take steps to delete such information. If you become aware that a child has provided us with personal information, please contact our support services.

How we share information we collect

We make collaboration tools, and we want them to work well for you. This means sharing information through the Services and with certain third parties. We share information we collect about you in the ways discussed below, including in connection with possible business transfers, but we are not in the business of selling information about you to advertisers or other third parties.
Sharing with other Service users

When you use the Services, we share certain information about you with other Service users.

For collaboration:
You can create content, which may contain information about you, and grant permission to others to see, share, edit, copy and download that content based on settings you or your administrator (if applicable) select. Some of the collaboration features of the Services display some or all of your profile information to other Service users when you share or interact with specific content. For example, when you bid on a shipment, we display your name, email and phone number next to your offer so that other users with access to the page can view them and make decisions. When you upload a document such as “CMR” or truck insurance to a shipment, other users with access to it will also be able to download and view your documents.

Moreover, every company has a public profile which can be viewed by any registered user. The company profile includes the contact data of the company administrator.

Managed accounts and administrators:
If you register or access the Services using an email address with a domain that is owned by your employer or organization, and such organization wishes to establish an account or site, certain information about you including your name, contact info, content and past use of your account may become accessible to that organization’s administrator and other Service users sharing the same domain. If you are an administrator for a particular site or group of users within the Services, we may share your contact information with current or past Service users, for the purpose of facilitating Service-related requests.

Sharing with third parties

We share information with third parties that help us operate, provide, improve, integrate, customize, support and market our Services.

Service Providers:
We work with third-party service providers to provide website and application development, hosting, maintenance, backup, storage, virtual infrastructure, payment processing, analysis and other services for us, which may require them to access or use information about you. If a service provider needs to access information about you to perform services on our behalf, they do so under close instruction from us, including policies and procedures designed to protect your information.
CargoPlanning Partners:
We work with third parties who provide consulting, sales, and technical services to deliver and implement customer solutions around the Services. We may share your information with these third parties in connection with their services, such as to assist with billing and collections, to provide localized support, and to provide customizations. We may also share information with these third parties where you have agreed to that sharing.

Third Party Apps:
You, your administrator or other Service users may choose to add new functionality or change the behavior of the Services by installing third party apps within the Services or to integrate the Service with your own or a third party system. Doing so may give third-party apps access to your account and information about you like your name and email address, and any content you choose to use in connection with those apps. If you are a technical or billing contact listed on an account, we share your details with the third-party app provider upon installation. Third-party app policies and procedures are not controlled by us, and this privacy policy does not cover how third-party apps use your information. We encourage you to review the privacy policies of third parties before connecting to or using their applications or services to learn more about their privacy and information handling practices. If you object to information about you being shared with these third parties, please uninstall the app.

Links to Third Party Sites:
The Services may include links that direct you to other websites or services whose privacy practices may differ from ours. If you submit information to any of those third party sites, your information is governed by their privacy policies, not this one. We encourage you to carefully read the privacy policy of any website you visit.

Social Media Widgets:
The Services may include links that direct you to other websites or services whose privacy practices may differ from ours. Your use of and any information you submit to any of those third-party sites is governed by their privacy policies, not this one.

With your consent:
We share information about you with third parties when you give us consent to do so. For example, we often display personal testimonials of satisfied customers on our public websites. With your consent, we may post your name alongside the testimonial.

Compliance with Enforcement Requests and Applicable Laws; Enforcement of Our Rights: In exceptional circumstances, we may share information about you with a third party if we believe that sharing is reasonably necessary to (a) comply with any applicable law, regulation, legal process or governmental request, including to meet national security requirements, (b) enforce our agreements, policies and terms of service, (c) protect the security or integrity of our products and services, (d) protect CargoPlanning, our customers or the public from harm or illegal activities, or (e) respond to an emergency which we believe in
good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person.

Sharing with affiliated companies:

At the moment there are not affiliate companies to share your information with, but in the future we may share information we collect with affiliated companies and, in some cases, with prospective affiliates. Affiliated companies are companies owned or operated by us. The protections of this privacy policy apply to the information we share in these circumstances. If such companies shall arise you will be notified via email.

Business Transfers:

We may share or transfer information we collect under this privacy policy in connection with any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company. You will be notified via email and/or a prominent notice on the Services if a transaction takes place, as well as any choices you may have regarding your information.

How we store and secure information we collect

Information storage and security

We use data hosting service providers in Romania and Ireland to host the information we collect, and we use technical measures to secure your data. For more information on where we store your information, please contact our support team.

While we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that data, during transmission through the Internet or while stored on our systems or otherwise in our care, is absolutely safe from intrusion by others.

How long we keep information

How long we keep information we collect about you depends on the type of information, as described in further detail below. After such time, we will either delete or anonymize your information or, if this is not possible (for example, because the information has been stored in backup archives), then we will securely store your information and isolate it from any further use until deletion is possible.

Account information:

We retain your account information for as long as your account is active and a reasonable period thereafter in case you decide to re-activate the Services. We also retain some of your information as necessary to comply with our legal obligations, to resolve disputes, to enforce our agreements, to support business operations, and to continue to develop and improve our Services. Where we retain information for Service improvement and development, we take steps to eliminate information that directly identifies
you, and we only use the information to uncover collective insights about the use of our Services, not to specifically analyze personal characteristics about you.

Information you share on the Services:
If your account is deactivated or disabled, some of your information and the content you have provided will remain in order to allow your team members or other users to make full use of the Services. For example, we continue to display messages you sent to the users that received them and continue to display content you provided such as quotations or documents attached to shipments.

Managed accounts:
If the Services are made available to you through an organization (e.g., your employer), we retain your information as long as required by the administrator of your account. For more information, see "Managed accounts and administrators" above.

Marketing information:
If you have elected to receive marketing emails from us, we retain information about your marketing preferences for a reasonable period of time from the date you last expressed interest in our Services, such as when you last opened an email from us or ceased using your CargoPlanning account. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created.

How to access and control your information
You have certain choices available to you when it comes to your information. Below is a summary of those choices, how to exercise them and any limitations.

Your Choices:
You have the right to request a copy of your information, to object to our use of your information (including for marketing purposes), to request the deletion or restriction of your information, or to request your information in a structured, electronic format. Below, we describe the tools and processes for making these requests. You can exercise some of the choices by logging into the Services and using settings available within the Services or your account. Where the Services are administered for you by an administrator (see "Notice to End Users" above), you may need to contact your administrator to assist with your requests first. For all other requests, you may contact us to request assistance.

Your request and choices may be limited in certain cases:
For example, if fulfilling your request would reveal information about another person, or if you ask to delete information which we or your administrator are permitted by law or have compelling legitimate interests to keep. Where you have asked us to share data with third parties, for example, by installing third-party apps, you will need to contact those third-party service providers directly to have your information deleted or otherwise restricted. If you have unresolved concerns, you may have the right to
complain to a data protection authority in the country where you live, where you work or where you feel your rights were infringed.

Access and update your information:
Our Services and related documentation give you the ability to access and update certain information about you from within the Service. You can update your profile information within your profile settings and modify content that contains information about you using the editing tools associated with that content.

Deactivate your account:
If you no longer wish to use our Services, you or your administrator may be able to deactivate your Services account. If you can deactivate your own account, that setting is available to you in your account settings. Otherwise, please contact your administrator. If you are an administrator and are unable to deactivate an account through your administrator settings, please contact CargoPlanning support. Please be aware that deactivating your account does not delete your information; your information remains visible to other Service users based on your past participation within the Services. For more information on how to delete your information, see below.

Delete your information:
Our Services give you the ability to delete certain information about you from within the Service. For example, you can remove content that contains information about you using the editing tools associated with that content, and you can remove certain profile information within your profile settings. Please note, however, that we may need to retain certain information for record keeping purposes, to complete transactions or to comply with our legal obligations.

Request that we stop using your information:
In some cases, you may ask us to stop accessing, storing, using and otherwise processing your information where you believe we don't have the appropriate rights to do so. For example, if you believe a Services account was created for you without your permission or you are no longer an active user, you can request that we delete your account as provided in this policy. Where you gave us consent to use your information for a limited purpose, you can contact us to withdraw that consent, but this will not affect any processing that has already taken place at the time. You can also opt-out of our use of your information for marketing purposes by contacting us. When you make such requests, we may need time to investigate and facilitate your request. If there is delay or dispute as to whether we have the right to continue using your information, we will restrict any further use of your information until the request is honored or the dispute is resolved, provided your administrator does not object (where applicable). If you object to information about you being shared with a third-party app, please disable the app or contact your administrator to do so.

Opt out of communications:
You may opt out of receiving promotional communications from us by using the unsubscribe link within each email, updating your email preferences within your Service account settings menu, or by contacting us as provided below to have your contact information removed from our promotional email list or
registration database. Even after you opt out from receiving promotional messages from us, you will continue to receive transactional messages from us regarding our Services. You can opt out of some notification messages in your account settings.

**Turn off Cookie Controls:**

Relevant browser-based cookie controls are described in our Cookies and Web Beacons section.

**Send “Do Not Track” Signals:**

Some browsers have incorporated “Do Not Track” (DNT) features that can send a signal to the websites you visit indicating you do not wish to be tracked. Because there is not yet a common understanding of how to interpret the DNT signal, our Services do not currently respond to browser DNT signals. You can use the range of other tools we provide to control data collection and use, including the ability to opt out of receiving marketing from us as described above.

**Data portability:**

Data portability is the ability to obtain some of your information in a format you can move from one service provider to another (for instance, when you transfer your mobile phone number to another carrier). Depending on the context, this applies to some of your information, but not to all of your information. Should you request it, we will provide you with an electronic file of your basic account information and the information you create.

**How we transfer information we collect internationally**

**International transfers of information we collect**

We collect information globally and primarily store that information in Romania and Ireland. We transfer, process and store your information outside of your country of residence, to wherever we or our third-party service providers operate for the purpose of providing you the Services. Whenever we transfer your information, we take steps to protect it like using in-transit encryption.

**Online Privacy Policy Only**

This privacy policy applies only to our online activities and is valid for visitors to our website and regarding information shared and/or collected there. This policy does not apply to any information collected offline or via channels other than this website.

**Rights of the data subject**

Given below is information on your rights in connection with your personal data:

- You may request information about your personal data processed by us. In particular, you can request information on the processing purposes, the category of personal data, the categories of
recipients to whom your data has been disclosed, the planned retention period, the rights to rectification, deletion, limitation of processing, or objection, the existence of a right to complain, the source of the data, if not collected from us, and the existence of automated decision-making including profiling and, where appropriate, meaningful information about the details;

· You may immediately demand the correction of incorrect or incomplete personal data stored with us;

· You may also request the deletion of your personal data stored by us, unless processing such data is required for the exercise of the right to freedom of expression and information, for the fulfilment of a legal obligation, for reasons of public interest or for assertion, exercise or defence of legal claims;

· You may request the limitation of processing of your personal data if the accuracy of your data is disputed, the processing is unlawful, but if you decline the deletion of such data and we no longer require the data, however you require the data for the assertion, exercise or defence of legal claims or if you have objected to the data processing;

· You may receive your personal data provided to us in a structured, standard and machine-readable format or require it to be forwarded to another data controller;

· You may revoke your consent previously given to us at any time. As a result, we are not permitted to continue the data processing based on this consent for the future;

· You may complain to a supervisory authority. You are normally permitted to contact the supervisory authority of your usual place of residence or workplace or our registered office.

**Consent**

By using our website, you hereby consent to our privacy policy and agree to its terms.

**Update**

This Privacy Policy was last updated on: October 1st, 2018.

This Privacy Policy go into effect starting with: November 1st, 2018.

*Should we update, amend or make any changes to our privacy policy, those changes will be posted here.*