

PRIVACY POLICY

Phonet LLC designed and built the Phonet Mobile (further also referred as “Application”) as a commercial application which should be used in order to provide our call Services using mobile phones. This application is provided by Phonet LLC and is intended for use as is.

This Privacy Policy is used to inform visitors regarding Phonet LLC policies with the collection, use, and disclosure of Personal Information if anyone decided to download the Application and use our Services.

If you choose to use our Service, then you agree to the collection and use of information in relation to this Privacy Policy. The Personal Information that Phonet LLC collect is used for providing and improving the Services. Phonet LLC will not use or share your information with anyone except as described in this Privacy Policy.

Phonet LLC understands that privacy of our users and subscribers is important. This Privacy Policy is designed to explain how Phonet LLC collect, use, process and store all the personally identifiable information which deemed as Personal Data which can be collected within the period of use of our mobile application Phonet Mobile.

The terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, which is accessible at Phonet Mobile unless otherwise defined in this Privacy Policy.

This Privacy Policy explains the entire procedure of collection and use of Personal Data of our application users as well as any individual whose Personal Data was supplied to the Phonet Mobile by such users.

Information Collection and Use

For the purpose of providing better experience while using our Application and Services we may require you to provide us with certain personally identifiable information, including but not limited to Personal Data. The information that Phonet Mobile request will be retained by Phonet LLC and used as described in this Privacy Policy.

The Application may use third party services that may collect information used to identify you.

Link to privacy policy of third party service providers used by the App:

- [Firebase](#)

The developer, Phonet LLC, notifies that the app’s privacy practices may include handling of data as described in this Privacy Policy.

Controllership

In limited cases where Phonet LLC acts as a data controller (i.e. it decides on the purposes of the processing), it may use certain minimum Personal Data for the following purposes:

- For account registration and administration;
- For providing any kind of user verification or client support;
- For the procedure of settlement and payments for the Services rendered;
- For troubleshooting and improving our Application.

Most of the processing activities occur through our clients' use of the Application.

In the context of such activities, we duly act as a data processor for your Personal Data and we do not have much control over how your Personal Data is used by our clients.

Categories of Personal Data

We may collect the following categories of Personal Data about our Application users and Service consumers:

- Certain biographical information such as name, surname, email address, phone number;
- information related to calls, such as the caller name and/or phone number and or responder name and/or phone number, waiting time, the length of each call, the start and end time of each call, the quantity of calls per day or month, the duration of each call etc.

How We Receive Personal Data

Phonet LLC may receive your Personal Data:

when our user or subscriber provide it directly to our Application (e.g., when registering in our system or when such information altered or modified by user or subscriber);

Through the use of our Application or Services by its users or subscribers.

Log Data

Phonet LLC has to inform you that whenever users or subscribers use our Application or Service, in a case of an error in the Application we may collect data and information (through third party products) on your mobile phone or smartphone and it so called Log Data. This Log Data may include information such as your device Internet Protocol (“IP”) address, device name, operating system version, location, the configuration of the Application when utilizing our Service, the time and date and duration of usage of the Service or Application, and other statistics which may be treated as Personal Data.

Cookies

Cookies are files with a small amount of data that are commonly used as anonymous unique identifiers. These are sent to your browser from the websites that you visit and are stored on your device's internal memory.

This Application and Service does not use these “cookies” explicitly. However, the Application may use third party code and libraries that use “cookies” to collect information and improve the Services. You may have the option to either accept or refuse these cookies and know when a cookie is being sent to your device. If you choose to refuse our cookies, you may not be able to use some portions of the Services.

Service Providers

Phonet LLC may employ third-party companies and individuals due to the following reasons:

- to facilitate our Service;
- to provide the Service on our behalf;
- to perform Service-related services; or
- to assist us in analyzing how our Service is used.

Phonet LLC will inform all the users and subscribers of Service or Application that these third parties may have access to Personal Information we collect and use. The reason is to perform the tasks assigned to them on our behalf. However, they are obligated not to disclose or use the information for any other purpose.

Basis of Processing

In the context of our data processing activities as a data controller, we may rely on one or more of the following legal grounds for processing your Personal Data:

- the need to perform our obligations under our [terms and conditions](#) (i.e., providing you with our Services);
- the need to pursue our legitimate interests, such as to improve our software and its functionality;
- any other ground, as required or permitted by law in the specific respective context.

In the context of Phonet LLC activities as a data processor, we process your Personal Data on behalf of our clients who rely on various legal grounds to process and share your Personal Data with us.

Purposes of Processing

Phonet LLC processes your Personal Data for the purposes of:

- providing the services to you and our clients and subscribers;
 - user account registration and administration;
 - managing the relationship with our clients and subscribers;
 - providing the support for our clients and subscribers;
 - producing any kind of analytics for calls made by clients and subscribers;
 - ensuring the settlement and payments for the services rendered;
 - resolving technical issues, detecting and fixing bugs in our Application;
 - complying with applicable laws including Personal Data protection regulations;
- Preventing or detecting fraud, security breaches or illegal activities.

Where Phonet LLC acts as data processor, the use of Personal Data is quite limited and the purposes of the processing are decided by the respective client (the data controller).

We do not use Personal Data to make automated decisions about users.

Sharing Personal Data with Third Parties

Phonet LLC may share your Personal Data with certain third-party providers for the purposes of facilitating the provision of our services and proper functioning of Application. We will require that all these

third-party vendors maintain at least the same level of Personal Data protection that we maintain for such Personal Data.

Such third-party vendors may provide helpdesk software services and/or cloud storage services.

Security

Phonet LLC value your trust in providing us your Personal Information, thus we are striving to use commercially acceptable means of protecting it. But remember that no method of transmission over the Internet, or method of electronic storage is 100% secure and reliable, and we cannot guarantee its absolute security.

Links to Other Sites

The Service may contain links to other sites. If you click on a third-party link, you will be directed to that site. Note that these external sites are not operated by us. Therefore, we strongly advise our clients and subscribers to review the Privacy Policy of these websites. Phonet LLC have no control over and assume no responsibility for the content, Privacy Policies, or practices of any third-party web-sites or services.

Other Disclosure of Your Personal Data

Phonet LLC may disclose your Personal Data:

- to the extent required by law or if we have a good-faith belief that such disclosure is necessary in order to comply with official investigations or legal proceedings initiated by governmental and/or law enforcement officials, or private parties, including but not limited to: in response to subpoenas, search warrants, or court orders;
- to the Police or any other law enforcement body of the country of origin or country where the client make or receive a call;
- in connection with a merger, division, restructuring, or other association change; or
- to subsidiaries or affiliates (if any) only if necessary for operational purposes.

If Phonet LLC will obliged to disclose your Personal Data in order to comply with official investigations or legal proceedings initiated by governmental and/or law enforcement officials, Phonet LLC may not be able to ensure that such recipients of your Personal Data will maintain the privacy or security of your Personal Data.

Children's Privacy

Our Application and Services do not address anyone under the age of 18. Phonet LLC do not knowingly collect personally identifiable information from children under 18. In the case we discover that a child under 18 has provided us with personal information, we immediately delete this from our servers and data storages. If the user or subscriber is a parent or guardian and you are aware that your child has provided us with personal information, please contact us so that we will be able to do necessary actions.

Data Integrity & Security

Phonet LLC takes information security very seriously. Phonet LLC permanently works hard to protect the Personal Data you give us from loss, misuse, or unauthorized access. Phonet LLC may utilize a variety of safeguards such as encryption, digital and physical access controls, non-disclosure agreements, and other technical, legal and organizational measures to protect the Personal Data submitted to us, both during transmission and once it is received, collected and stored.

However, please be aware that no electronic transmission, storage, or processing of Personal Data can be entirely secure. Phonet LLC cannot guarantee that the security measures used for the purpose to safeguard and protect Personal Data will never be defeated or fail, or that those measures will always be sufficient or effective. Therefore, although Phonet LLC is committed to protecting your privacy data, we do not promise, and you should not expect that your Personal Data will always remain private or secure.

Data Retention Period

Phonet LLC will retain Personal Data of each client, user or subscriber only for a certain period of time which may continue as long as it will be necessary for the purposes set out in this Privacy Policy. By default Phonet LLC will retain Personal Data during the period necessary for the purpose(s) for which it has been collected and/or is being processed for up to 3 (three) years unless a longer retention period is established by applicable laws.

Phonet LLC will remain the right to retain and use your Personal Data to the extent necessary to comply with our legal requirements and/or contractual obligations (for example, if we are required to retain your Personal Data to comply with applicable laws or to ensure the payment for the services rendered), resolve disputes, and enforce our legal agreements and policies.

Some data may be deleted whenever you like and some data will be deleted or shortened automatically, but some data may be retained for longer periods of time when it is necessary for Phonet LLC. When client, user or subscriber decided to delete data, we may follow a deletion policy (if any) to make sure that Personal Data was safely and completely removed from our servers and storages or retained only in necessary volume and anonymized form.

Sometimes business and legal requirements oblige us to retain certain information, for specific purposes, for an extended period of time. For example, when we process a payment, or when client, user or subscriber make a payment to us, we'll retain this data for longer periods of time as required for tax and/or accounting purposes. Reasons we might retain some data for longer periods of time included but not limited:

All kind of security measures including fraud protection and/or abuse prevention.

Financial record-keeping including all kind of taxation matters.

Complying with legal or regulatory requirements, enforcement the court decisions.

Ensuring the continuity of our Services and improvement of Application.

Further direct communications by email in order to offer the special prices for services or new discounts if any.

Access, Review, Objection to Processing and Portability

If the client, user or subscriber is a European citizen or resident, the GDPR grants a number of additional rights concerning the use, storage, and processing of Personal Data. In situations when Phonet LLC acts as a data processor and our client, user or subscriber is a data controller who holds Personal Data of our client, user or subscriber, you must contact this person directly if you wish to exercise any of the privacy rights mentioned below.

Understand certain circumstances; you may exercise the following privacy rights:

- right of access – you may ask us whether we are processing your Personal Data and you have the right to request a copy of the information we hold about you.

- right of rectification – you have the right to correct inaccurate or incomplete Personal Data about you and you may have the ability to do so yourself in the settings of your Profile.

- right to be forgotten – you can ask for the information that we hold about you to be erased from our system and we will comply with this request unless we will have a legitimate reason not to do so.

- right to restriction of processing – where certain conditions apply, you can ask us to 'block' the processing of your Personal Data.

- right to data portability – you have the right to have the data we hold about you transferred to another organization and to receive Personal Data in a structured, commonly used format.

- right to object to automated processing (including profiling) – this right provides you with the ability to object to a decision based on purely automated processing. We are not currently processing your Personal Data for such type of automated decision-making, including profiling, but if we elect to do so in the future we will provide you with notice and choice, in accordance with EU data protection law;

If any of our clients, users or subscribers wishes to learn more about the GDPR and your rights, the <https://www.privacy-europe.com/> website is a reliable source.

Changes to This Privacy Policy

If Phonet LLC decided to make any material change to this Policy, we will post the revised Privacy Policy to our web page and update the "Effective on" date above to reflect the date on which the new Privacy Policy became effective. We will also notify you about these changes via email or by official web-site information.

Phonet LLC may update this Privacy Policy from time to time. Thus, you are advised to review this information periodically for any changes. Phonet LLC will also notify clients, users or subscribers of any crucial changes by posting or providing the information of new Privacy Policy using its official web-site www.phonet.ua.

Legal rights under the General Data Protection Regulation (GDPR).

Any person as a data subject, have the following rights regarding the personal data:

- a) The right to request access to your personal data (Art. 15 GDPR);
- b) The right to rectification or erasure of your personal data (Art. 16 and Art. 17 GDPR);
- c) The right to restriction of, or to object the processing of your personal data (Art. 18 and Art. 21 GDPR);
- d) The right to data portability (Art. 20 GDPR).

Please note that your rights according to b), c) and d) above will only exist under certain conditions pursuant to the GDPR and may, therefore, not apply vis-à-vis us. Furthermore, you always have the right to lodge a complaint with a data protection authority.

Contact information

If you have any questions or suggestions about our Privacy Policy, do not hesitate to contact us at our official address in Kiev, Ukraine.

If you need to contact to ask some questions about this Privacy Policy or the processing of your Personal Data, please be advised that you may send an email at privacy@phonet.ua or send us the letter to the following address: 3, Surikova str., Kyiv city, Ukraine, office 34.

This policy is effective as of May 31st, 2020.