

Privacy Policy

Last revised and updated on 2023-07-31.

Your privacy is important to us. We describe in this notice how we collect and use information about you in your use of the WebSimulator services, including the WebSimulator platform and related websites. If you are one of our customers, please read this notice.

1. Who we are?

As you know, we are an internet service provider. According to European Union ('EU') data protection laws, we are qualified as 'data controllers' when collecting information about our customers or website visitors. We are responsible for deciding how we hold and use your personal data.

2. How do we collect information about you?

When you fill in a contact form on our website, send us an email, or register to use our platform and apps, we collect information about you. We will need basic personal information to fulfill your request, whichever way you contact us.

We may also receive your personal data from third parties when you express interest in our services.

We collect information by automated means. When you visit our website, view an advertisement on a third-party website, or read our marketing email, we automatically collect information about you through cookies, web beacons, and other similar technologies. These are small files associated with information that your browser or our servers will save and return as part of your use of the website and services, such as saving your login session between visits, remembering viewing preferences, and tracking website usage.

3. What information do we collect about you?

We collect two types of information about you: personal data and non-personal data.

Personal data. It is information that lets us know who you are. It includes the information you provide when you register to use the platform, such as your name, simulated company name, email address, postal address, and other contact information you share with us. Your login credentials are also personal data. This category also includes information

linked to your identity that you provide us through other means, such as emails to our support team and transactional information, including purchase history, order and contract information, details about deliveries and technical support, and payment and billing information.

Non-personal data. It is information that does not allow us to determine your identity. It usually comes from your use of the services after registration. Non-personal data includes information that can personally identify you in its original form but has been modified to remove or hide (for example, by aggregation) any personal data.

4. How do we use your information?

If you are a visitor to our website, we use your personal and non-personal data to interact with you and support live conversations.

When you are one of our customers, we use the information we collect about you to provide services to you. As part of this purpose, we use your personal and non-personal data to:

- 1. create and maintain your platform account and control access to it;*
- 2. provide real-time records of your use of the platform;*
- 3. respond to any requests you may submit for support or sales information or similar communications;*
- 4. communicate with you (for example, through newsletters, marketing emails, announcements, or special offers) about our services;*
- 5. for billing and collection purposes, if you have subscribed to one of our paid services;*
- 6. for the investigation and prevention of fraud and breaches of the terms of service;*
- 7. to allow third parties to provide services to us;*
- 8. for customers requesting allocated dedicated IP addresses, assign the dedicated IP address to that customer;*
- 9. to comply with applicable laws to which we are subject.*

We may use your non-personal data to improve services, for example, through web analytics or troubleshooting. We may also use aggregated or de-personalized information to promote our services, such as by disclosing usage statistics, to make the websites easier to use, such as by identifying you across platforms or devices to provide a consistent user experience, and by tailoring content and advertising relevant to your interests through analytics and profiling technologies.

10. *Subscribe / Unsubscribe.*

We offer you the option to receive different types of communication and information related to our company, products, and services. You can subscribe to e-newsletters or other publications and receive marketing communications and other special offers from us via email. If at any time you would like to change your email communication preferences, we provide an unsubscribe option.

5. On what legal basis do we collect your personal data?

We collect your personal data because we need to perform a contract we have signed with you or because you have taken steps to enter into a contract with us (for example, when you fill in a contact form to request information about our services or when you sign up for a WebSimulator access account or request to purchase application credits from the WebSimulator platform). Otherwise, we collect personal data based on your consent.

Minors

We do not knowingly collect information from minors who do not have authorization from their parents, guardians, or legal representatives to use our services. Suppose a parent, guardian, or legal representative learns that his or her minor child has provided us with personal information without his or her prior authorization. In that case, he or she should contact us at privacy@websimulator.biz.

6. With whom do we share personal data?

Except for the limited circumstances described here or in the applicable contract/terms of service, we do not share your personal data with third parties. Where we need to provide your personal data to third parties, we will only share it to the extent necessary to provide our services. We may also share your personal data as necessary or permitted by law and as described below.

We host the website and operate the WebSimulator platform using third parties. The platform will be hosted in data centers in Brazil, the United States and/or Europe, based on where we deem most convenient to deploy WebSimulator services.

We may use financial services from Banco do Brasil, Asaas, Husky, Stripe, and Chargify, among others, to process payments. Therefore, we provide them with the personal data necessary for us to receive electronic transfers, charge your credit card or debit card.

We may use third-party services embedded in our website (such as Disqus, Drift, Optimizely, Segment, and Google Analytics) or outside of it (such as GitHub, WhatsApp,

Facebook, Instagram, Skype, Telegram, and Twitter) to communicate with you or enhance the function of the website and services.

We use third-party platforms and service providers (such as Google, WhatsApp, Instagram, and others) for customer engagement, customer chat, product feedback, and customer support ticketing.

While we do not provide these third parties with more information than is necessary for them to provide the services to us, any information you provide to these service providers independently is subject to their respective privacy policies and practices.

In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

In addition, we will provide information to third parties in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or a portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

7. Security

The security of your personal information is important to us. We follow generally accepted standards to protect personal information submitted to us during transmission and after receiving it. WebSimulator's infrastructure is located in top data centers. Each location adheres to strict physical and procedural, frequently audited controls. Mailing applications are routinely checked for vulnerabilities. All of our people undergo background checks and sign non-disclosure agreements upon hire. If you have any questions about the security of your personal information, please get in touch with us at privacy@websimulator.biz.

Please keep in mind, however, that some parts of the services are public and that email, by its nature, is not a reliable private means of communication. If you voluntarily provide personal data in a public area of the website, unrelated third parties online may view and collect it. If you do not wish to make this information publicly available, please do not post it.

8. For how long do we retain your personal data?

We keep your personal data for as long as necessary to provide our services to you.

If you want us to cease all described uses of your personal data, you may inform us of this decision. This procedure will not delete all your personal data from our records, but we will no longer use it. We may also retain copies of your personal data in backups. Please note

that we may be required to retain certain information by law and/or for legitimate business purposes.

9. What are your rights regarding personal data?

You have the right to:

1. Request access to your personal data. This procedure allows you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
2. Request correction of the personal data we hold about you. This procedure allows you to correct any incomplete or inaccurate information we hold about you.
3. Withdraw your consent and cancel our communications. We will honor your unsubscribe within 10 days. Please note that you cannot unsubscribe from service-related messages like password recovery.
4. Object to processing your personal data, for example, if we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation that makes you want to object to processing on that basis.
5. Request transferring your personal data to another party (right to data portability).

If you wish to exercise any of the above rights, please email our privacy team at privacy@websimulator.biz.

If you have an unresolved privacy or data use issue that we have not addressed satisfactorily, please get in touch with us to discuss your disagreement.

10. Changes

The information in this notice may be modified to address new issues or policy changes. We will post the changes here. If we make significant changes, we may notify you by other means (for example, by email or with a banner on the website) before the change is effective. Any changes we make will take effect 1 day after the updated date mentioned below. If you object to the changes, please email privacy@websimulator.biz requesting to cancel the use of your data and immediately stop using our services.

July 31, 2023