

"inboxCEO" provides variety of Data Driven Marketing products and services.

We are deeply committed to privacy, and want our users and customers to understand how we collect information and our commitment to privacy, copyright laws and similar laws that deal with data and data driven communications.

1. Source of Information

At inboxCEO, we are dedicated towards empowering businesses to engage meaningfully with their customers. For this we collect and store "data" (personally identifiable information, contact details, Company details, Social Information, publicly available financial information and filings and other such distinguishing information) in a variety of ways to enable our clients to reach their customers effectively.

- 1. We collect data when users visit our website, and engage in activities like creating an account, downloading content, registering for a webinar, signing up for a newsletter or email, we may request for some information which we may use in accordance with this Privacy Policy.
- 2. We have partnered with data suppliers, data providers, data agencies, and other strategic business partners who are similarly advised to adhere to relevant and applicable privacy and copyright laws. We do not partner with any company, individual or organization who willfully collects and supplies data without proper regulatory, privacy or copyright compliance.
- 3. We also collect data from a number of sources such as public databases, social media, publications, surveys, subscriptions to enhance our ability to provide better marketing services.
- **4.** We also gather permission based data when you download, and use applications developed by inboxCEO or when you permit us gather such contact information stored on your Device, Application or Service.
- 5. We collect data when users and customers participate in Information Exchange programs or opt-in campaigns.
- 6. We collect data from Contact Signature Cards, Email signatures, Email Headers, and Visiting Cards shared or exchanged during participation in public or private Events, Lectures, Conferences and Promotions.
- 7. We also collect data from Websites by our proprietary search and web crawling mechanisms and other such web data extraction tools from public web sites and permitted web pages.



2. Information we collect

People, Personnel or Personal information refers to data that can be used to identify or contact an individual. We might ask you to provide your personal information anytime you are in contact with inboxCEO or any other affiliated company. This information includes, but is not limited to name, title, company name, job function, expertise, postal address, telephone number, email address, Work location, Cell Phone number, company number and extension and more. We collect the content and other information you provide when you use our Services, including when you sign up for an account, use our products or services, provide other information related to other people or company, etc. inboxCEO and its affiliates may share this personal information with each other and use it consistent with this Privacy Policy. We may also combine it with other information to provide and improve our products, services, content, and advertising.

WE DO NOT COLLECT, COMPILE OR STORE ANY PERSONALLY IDENTIFIABLE INFORMATION (PII) OR SENSITIVE PERSONAL INFORATION(SPI). WE BELIEVE THIS VIOLATES THE PRINCIPLES OF PRIVACY AND IS UNETHICAL AND WE DISCOURAGE ANY INTENTIONAL USE OF SUCH INFORMATION.

WE CONSIDER THE FOLLOWING LIST AS PII/SPI AND WE ROUTINELY CLEANSE AND PURGE OUR DATABASE OF SUCH INFORMATION IF IT EXISTS.

- i. NAMES USED TO IDENTIFY THE INDIVIDUAL IN PRIVACY
- ii. PSEUDONYMS OR ALIASES
- iii. HOME ADDRESS
- iv. PRIVATE EMAIL ADDRESSES (YAHOO, GMAIL, HOTMAIL ETC.)
- v. SSN OR OTHER SUCH NATIONAL ID'S
- vi. DRIVING LICENSE OR OTHER SUCH STATE ISSUED ID'S
- vii. VEHICLE REGISTRATION NUMBERS
- viii. FINGERPRINTS OR IRIS SCANS OR SUCH BIOMETRIC IDENTIFIERS
- ix. CREDIT CARD NUMBERS OR OTHER SUCH FINANCIAL INFORMATION

EXCEPT FOR TRANSCATIONS ON OUR SITE

x. GENETIC OR OTHER BIO MARKERS

We also collect data that is not directly associated with any specific individual. This might include, but is not limited to, browser and device information, IP address, system activity, location, information collected using server logs, cookies, pixel tags, HTTP Referrer or similar technologies. We do this to improve services we offer you and help you with targeted marketing and lead generation, and improve our website's usability. We may also use this information to display information which we think may be of interest while you browse through websites. We also collect Company Information as is available on the Internet or any such public sources including Filings, Utilities, stock data from 3rd Party API providers, Vendor relations, Press Releases, White Papers, Announcements, Organizational Changes, Insider Trading, Install Base.



We also collect Company web traffic and related data including but not limited to Search Engine Optimization Data, Web Analytics Data, Traffic, Software stack used to build the website, Web technology used to build the website, traffic patterns of the website, typical sources of traffic to the website and more. We may collect this ourselves or via 3rd party service providers.

3. Use of Information

The Data provided on our website as a product or as a service is provide as is to our clients. Our customers may use the information in ways that are appropriate and legal for their country and we encourage full legal adherence to all rules, laws and regulations of the land in use of our data. inboxCEO are not responsible on how the data is used by our end users/customers and inboxCEO assumes no obligation or responsibility on how this information is finally used. For complaints, or other enquiries write to us at sales@inboxceo.com.

4. Policy Amendments

We may change our Privacy Policy from time to time. We will post the changed version of our privacy policy changes on this page. Please review this website every now and then to understand any changes as use of this website subsequent to changes implies that you accept the revised privacy policy.

5. Opt-Out

Our users may unsubscribe from our email list or newsletters at any point by following the instructions at the end of the email If you would like to have your profile updated, edited, changed or deleted please contact us at sales@inboxceo.com.

6. Third Party

We work with our partners to ensure that we bring best in class products and services to our customers. We share information with our partners who help us provide customer care service, facilitate payments, conduct research and surveys, measure ad effectiveness, provide technical services etc. These partners are bound by strict legal and confidentiality obligations to control any shared information, governed by the contracts and agreements we entered with them. However, neither inboxCEO nor the affiliates, partners or resellers have control over or obligated herein to control the eventual use of the data.

Our websites may allow you to link to other websites, either through direct links or through social media icons like "Like", "Share" buttons. Likewise, other websites might have link to inboxCEO or its affiliates' websites. The information or content collected on their websites is governed by the Privacy Policy of those websites, and not by our Privacy Policy. We encourage you to review such third-party Privacy Policy to understand the how they handle such information.



7. Others

- 1. We commit to adhere to laws laid out by the government. It may be required by law, legal process, litigation, or request from government bodies to share information, in which case such information will be disclosed.
- 2. Any violation of inboxCEO terms and conditions may lead to an investigation to enforce the terms and conditions. Also, if a fraud, security breach or technical issue is detected, any required information might be made available to the investigators.

8. Updating Information

Access, Correct, Remove:

We believe in maintaining the highest level of security for any information that we hold. If we have any information that you want to update, you may review, update or delete any information we might hold by logging in using your secured credentials and modifying your information.

9. Data Transfer and Storage

Any information that we collect may be stored and processed in any country where we have our official business facilities and engage in business operations. Please note that the data governing policies of these countries might be different from the Privacy Policy in the country where you reside and from where the information was collected. We will retain any information for the period required to fulfill the goals outlined in this Privacy Policy, or as required by law.

10. Integrity and Internal Monitoring

We take measures to ensure that data is handled, protected and transmitted securely. For this reason, we have built a secure infrastructure surrounded by firewalls and encryptions.

Also, all employees are made aware of security guidelines and are mandated to adhere to practices that are consistent with this Privacy Policy.

11. EU-U.S. Privacy Shield Policy and U.S.-Swiss Safe Harbor Framework

inboxCEO participates in, and is committed to compliance with, the EU-U.S. Privacy Shield Framework ("Privacy Shield Framework") as set forth by the U.S. Department of Commerce. inboxCEO seeks to comply with the principles of the U.S.-Swiss Safe Harbor Framework regarding Notice, Choice, Onward Transfer, Security, Data Integrity, Access and Enforcement. If there is any conflict between the policies in this privacy policy and the Safe Harbor Privacy Principles, the Safe Harbor Privacy Principles shall govern. To learn more about the US-Swiss Safe Harbor, please visit http://www.export.gov/safeharbor.



In compliance with the US-Swiss Safe Harbor Principles, inboxCEO is committed to resolving complaints about your privacy as well as our collection or use of your personal information. Swiss citizens with questions or complaints regarding this privacy policy should first contact at sales@inboxceo.com.

12. Contact Us

Any violation of inboxCEO terms and conditions may lead to an investigation to enforce the terms and conditions. Also, if a fraud, security breach or technical issue is detected, any required information might be made available to the investigators.

For any questions or to know more about our Privacy Policy, you may contact us at - sales@inboxceo.com.

13. Reference Laws and Regulations

Country Wise Reference to SPAM laws

USA

- CAN-SPAM ACT
- Compliance Guide to CAN-SPAM ACT
- Rules related to CAN-SPAM ACT
- FTC's consumer guide
- https://epic.org/
- www.privacy.org
- https://www.donotcall.gov/

Australia

Spam Act 2003

Austria

Telecommunications Act 2003

Belgium

Etat des lieux en juillet 2003, July 4, 2003

Canada

Canada's Anti-Spam Legislation (CASL) CASL basics.



China

Measures for Administration of E-Mail Service on Internet (2006) (Unofficial English Translation)

Cyprus

Section 06 of the Regulation of Electronic Communications and Postal Services Law of 2004.

Czech Republic

Act No. 480/2004 Coll.

Estonia

Information Society Service Act

EU

Article 13 of **DIRECTIVE 2002/58/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL** of 12 July 2002. The Contact Network of Spam Enforcement Authorities (CNSA).

The Directive is implemented by each member state independently so you will want to check with your particular country law for more details.

EU General Data Protection Regulation. http://www.eugdpr.org/

France

CNIL Guidelines on email marketing.

Germany

Art. 7 German Unfair Competition Law (Gesetz gegen Unlauteren Wettbewerb) (UWG) Art. 202a, 263, 303a, 303b of the German Criminal Code Art. 6 of the German Law regarding Information Society Services Art. 28 Par. 4 of the German Data Protection Act.

India

Information Technology Act of 2000

Italy

Italy's anti-spam laws are very strict. You can even be imprisoned for sending spam. If you're sending to Italian recipients, follow these guidelines as well.

Personal Data Protection Code (legislative decree no. 196/2003)

The Code transposed EC Directive 95/46 on the protection of personal data and EC Directive 2002/58 on privacy in electronic communications; it consolidated all Italian pre-existing laws and regulations in this sector.



DL 196/2003 Personal Data Protection Code

- DL 675/1996 on privacy protection states, inter alia, that a company must have authorization from each user whose personal data (such as e-mail) they want to use.
- DL 171/1998 (deriving from the European Community directive 97/66/CE) on telecommunications privacy protection: this put outlaws all automatic systems to call a user and says that all the expenses of an advertising must be paid by the company and not the user (faxes and e-mails are instead paid also by the user).
- DL 185/1999 (deriving from the European Community directive 97/7/CE) on customer protection with respect to long-distance contracts: this obliges companies to seek the permission of the user for virtual or telephone sales.

China

Netherlands

New Zealand

The Unsolicited Electronic Messages Act 2007. The Department of Internal Affairs provides detailed guidelines on the anti-spam las.

South Africa

Regulation of Spam in South Africa – South African Law.

Sweden

Swedish Marketing Act (Swedish Code of Statutes, SFS 1995:450). Personal Data Act (Swedish Code of Statutes, SFS 1998:204), in so far as spam activities involve processing of personal data.

UK

The Privacy and Electronic Communications (EC Directive) Regulations.