
PRIVACY POLICY

Last Modified: 28.11.2019

This Privacy Policy (the "Policy") explains the way in which Futurecomes Family PLC (hereinafter referred to as "Callaba") collects, uses, shares, and protects Personal Information of users ("User", "you") obtained through the <https://callaba.io/> website ("Website") and its services. The terms "we," "us," and "our" refer to "Callaba".

"Personal Information" is an information that identifies or can be used to identify, contact, or locate the person to whom such information pertains.

At Callaba, we are fully committed to respecting privacy and to protecting any information that our users provide. Your privacy and security are both our highest priorities and we make every effort to ensure that all the information provided by you is protected.

We follow and comply with best practices and regulation in the sphere of privacy including but not limited to General Data Protection Regulation (GDPR).

Unless otherwise expressly stated by the Policy, all definitions herein shall be understood, as they appear in Callaba's Terms and Conditions.

1. WHO WE ARE

1.1. The Personal Information on the Website is collected, controlled and processed by the Futurecomes family PLC, a legal entity with registry code 14015117 and with registration address in Harju maakond, Tallinn, Põhja-Tallinna linnaosa, Randla tn 13-201, 10315, contact e-mail: support@callaba.io.

2. PERSONAL INFORMATION WHICH WE MAY COLLECT

2.1. While providing our services, we may collect Personal Information, namely:

2.1.a) **An information necessary for registration.** When you register on our Website, you shall provide your name, an e-mail address and create a password. When you use Facebook to log-in to our Website or to create an account on our Website we may collect and process your Facebook profile information.

2.1.b) From time to time we may add some services on a fee-paying basis. In case you are willing to use such services, we may process your credit/debit card information.

2.1.c) **Contact data:** when communicating with Callaba we might process Personal Information, which you may willingly provide to us, for example: name, address, telephone number, e-mail, etc. Provision of Personal Information, described in this clause is optional.

2.1.d) **Passively collected data:** during your activities on the Website, our system might automatically process following information: Internet protocol (IP) address, browser type, Internet service provider (ISP), referring/exit pages, the files viewed on our Website (e.g., HTML pages, graphics, etc.), operating system type and version, client version, IP addresses along the network path, the MAC address of your internet connection, date/time stamp, and/or clickstream data to analyze trends and administer the Website and/or Services. In addition, when you use some of our Services, usage information is transmitted back to us so

we can determine how users are interacting with our Services, to assist us with improving our Services, and to correct any problems that may occur.

2.1.e) **Marketing data:** We also automatically record information about your usage of the Service, including actions taken, date and time, frequency, duration, quantity, quality, network connectivity, and performance information related to logins, clicks, messages, contacts, content shared, calls, use of video and screen sharing, meetings, cloud recording, and other feature usage and marketing information.

2.1.f) **Information related to Calls:** invitation content, participants, meeting link, date, time and duration. We collect activity recorded during the Call (such as joining or leaving), including without limitation activity related to communication via Call, together with the date, time, person engaged in the activity, and other participants in the Call with the date, time, duration, and quality ratings that you provide. We route audio and video content and screen sharing content between Call participants, but we do not retain or store the content unless cloud recording is used.

2.1.g) **Information related to messages.** We may process message content, sender and recipients, date, time, and read receipts as well as content shared: files and file names, sizes, and types.

2.1.h) You may wish to share with us some other Personal Information, that is not described in this Policy. We reserve the right to collect and process such data.

2.1.i) Our Website uses Google Analytics, a web analysis service of Google, Inc. Google Analytics employs cookies that are stored to your computer in order to facilitate an analysis of your use of the Website. The information generated by these cookies, such as time, place and frequency of your visits to our site, including your IP address, is transmitted to Google. If you want to know more about Google Analytics, please visit <https://www.google.com/analytics/terms/us.html>.

3. CHILDREN

3.1. The services of Callaba are not purposed for the use of persons under the age of 18 years. Only persons of legal age are permitted to use the services of Callaba and register in our Website. Therefore, we do not knowingly collect personal data from children. So, if you are under the age of 18 years, please do not use Callaba's Website and do not provide any Personal Information to us.

4. OUR USE OF YOUR INFORMATION

4.1. All processing of the Personal Information is performed in accordance with the GDPR. We process your Personal Information for the purposes listed below. If Callaba will ask to provide any other Personal Information not described above, then such information, the purpose and legal basis for the collection and processing, will be communicated to the User at the point of collecting the Personal Information.

4.2. **For compliance with legal obligations (Art 6 para 1 lit c GDPR).** From time to time Callaba is obliged to collect and process Personal Information as it prescribed by respective laws and regulations. Notwithstanding anything to the contrary in this Policy, we

may preserve or disclose your information if we believe that it is reasonably necessary to comply with a law, regulation, legal process, or governmental request; to protect the safety of any person; to address fraud, security or technical issues; or to protect our or our users' rights or property. The following data processing operations, for example, are covered by such legal obligations:

4.2.a) compliance and risk management;

4.2.b) monitoring for prevention of fraud, misuse (e.g. for illegal purposes) and any other type of criminal activity;

4.2.c) providing legal aid to competent authorities in the context of criminal proceedings or to prosecution in accordance with official orders and requests.

4.3. For the performance of our Services (Art 6 para 1 lit b GDPR). It may be necessary to process your Personal Information in order to perform our Services, fulfil our contractual obligations or to provide you with the possibility to enter into contractual arrangements with us. The following data processing operations, for example, are covered by such contractual obligations:

4.3.a) To maintain our Website. We use Personal Information to ensure general performance of our services, all tasks necessary for the operation, performance and administration of Callaba and its Website;

4.3.b) To improve our Website and services. Personal Information helps our systems ensure that our interface is accessible for users across all platforms and devices;

4.3.c) To save records of Calls. We may store records of Users' Calls in order to provide Users with an opportunity to save such records or to download them to cloud storage;

4.3.d) To analyze and to improve the quality of the services and the general user experience;

4.3.e) To provide information security and IT-security on our Website and safeguarding our network;

4.3.f) To send periodic e-mails: We may use the information we collect from you when you register or use certain other Website features (e.g. filling of the contact form). This might be for security reasons, to ask your opinion about the Website, or it may be to keep you updated on any changes to the services provided on the Website;

4.3.g) market research, business management and continuing development of services and products;

4.3.h) processing statistical data, performance data and market research data via the Website or social media platforms;

4.3.i) processing client preferences (e.g. language, region) via cookies on our Website (see more about cookies below);

4.3.j) direct marketing and advertising (e.g. performance of marketing strategies, targeting of Users, advertisement from Callaba and its partner companies).

4.4. **For the protection of the legitimate interests (Art 6 para 1 lit f GDPR).** Where necessary, data processing might take place beyond the performance of the agreement in order to maintain the legitimate interests of Callaba or a third party. The following data processing operations are covered by such a legitimate interest:

- 4.4.a) prevention of fraud, misuse (e.g. for illegal purposes) and any other type of criminal activity;
- 4.4.b) identification and examination of potentially vulnerable accesses to our Website;
- 4.4.c) measures for protecting our Users, as well as safeguarding network and information security; also measures to protect our employees and property of Callaba;
- 4.4.d) processing inquiries from competent authorities, lawyers in the course of legal prosecution and enforcement of legal claims in the context of legal proceedings.

4.5. **Based on your consent (Art 6 para 1 lit a GDPR).** If you have given us your consent to process your Personal Information, processing will only take place in accordance with the purposes defined and to the extent agreed in the declaration of consent. You have a right to withdraw your consent at any time, if you no longer agree to the processing. For example, with your consent we are processing data for the following purposes:

- 4.5.a) direct marketing and advertising (e.g. client satisfaction surveys, newsletters and other advertising communications);
- 4.5.b) website analysis and tracking for advertising purposes via cookies;
- 4.5.c) Please note that the withdrawal of the consent does not affect the lawfulness of processing based on consent before its withdrawal.

5. DATA RETENTION ---

5.1. For how long we retain your Personal Information depends on the type of information and the purpose for which we process the data. We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Policy and to comply with our contractual and/or legal obligations unless a longer retention period is required or permitted by law.

6. SHARING OF THE INFORMATION ---

6.1. In certain situations, We may be required to disclose Personal Information in response to lawful requests by competent authorities, including to meet national security, public interests or law enforcement requirements.

6.2. We may disclose your Personal Information where required by law (e.g., to comply with a subpoena, warrant, court order, or legal process served on Callaba), and when we believe that disclosure is necessary to protect our rights, avoid litigation, protect your safety or the safety of others, investigate fraud, and/or respond to a government request.

6.3. Our officers and/or employees will receive access to your Personal Information on a need-to-know basis only.

6.4. Our Website and/or Services are not suitable for sharing logins and passwords, cryptographic keys, debit/credit card information, PIN codes, numbers of ID documents and any other type of sensitive information. You shall not share such sensitive information via our Website and/or Services. It is solely your responsibility to secure respective sensitive information and Callaba will not be liable for any transfer of such kind of information via our Website and/or Services.

6.5. Callaba might share your Personal Information with third parties with your consent or for the purpose of performing a contract. We require any company with which we may share your Personal Information to protect that data in a manner consistent with this Policy and to limit the use of such Personal Information to the performance of services for Callaba.

6.6. To a limited extent, we transmit Personal Information to the following processors: Google, Facebook and Amplitude. Processors may only use or disclose this data to the extent necessary to perform services for us or to comply with legal rules.

7. COOKIE POLICY

7.1. Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your computer's hard drive.

7.2. The first time you visit our Website with one of your devices, a pop-up will appear with the information that our Website uses cookies as well as a link to our Privacy Policy. With this pop-up you will be able to adjust personal settings in connection with cookies.

7.3. Like many websites, we use "cookies" to collect information in order to make our Website more user-friendly, for example by remembering your personal preferences and settings. Additionally to that, we use cookies to help the Website work properly, improve your user experience, and to ensure services promoted are relevant to you. Our cookies don't store personal information like your name or address. Some cookies last only for the duration of your web session and expire when you exit your browser; other cookies may last for longer than your web session, including after you exit your browser, for example by remembering you when you return to our Website. The table below explains the cookies that Callaba and our third-party partners use and why.

Category of Cookies	Purpose
Essential Cookies	Essential cookies, web beacons and other tracking technologies are necessary for the operation of the Website and Services. These tracking technologies enable you to move around on the Website and use the Website's features. You may not opt-out of these types of cookies because they are required to operate the Website and Services.
Performance cookies	Performance cookies, web beacons and other tracking technologies collect information about how you have used the Website and Services. We use performance cookies, web beacons and other tracking technologies to improve the user experience with our Website and Services.

Functionality cookies	Functionality cookies, web beacons and other tracking technologies allow us to remember how you are logged into our Website, when you logged in or out and the actions you have taken while you have been logged into the Website. We use functionality cookies to improve the user experience with our Website and Services and to remember your activity on the Website and Services.
Advertisement Cookies	Advertising cookies, web beacons and other tracking technologies are used by our third-party service providers to deliver advertising to you on other third-party websites as well as help measure the effectiveness of our advertising. We also use these types of cookies to analyze Website visits and ad conversions from third-party websites.

7.4. We recommend you don't change your cookie settings as it may limit your user experience and the performance of the Website. If you do want to change the cookies setting, you can do this through your browser. Different web browser may use different way of controlling cookies, so you'll need to use your browser's help section to find out how to do this.

8. SECURITY MEASURES

8.1. The security of information is very important to Callaba and we are committed to protecting information we collect. We maintain comprehensive administrative, technical and physical measures designed to protect your Personal Information against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use. For example, we use Transport Layer Security (TLS) cryptographic protocol while dealing with Personal Information.

8.2. We use certain security measures to keep your Personal Information safe, but we cannot guarantee that these measures will stop any users try to get around the privacy or security settings on the Website through unforeseen and/or illegal activity. That is why we make no warranty, express, implied or otherwise, that we will prevent such access.

9. YOUR RIGHTS TO YOUR INFORMATION

9.1. In accordance with effective regulations You have a significant number of rights related to your Personal Information, such as e.g.:

9.1.a) You may request access to the Personal Information we maintain about you. If you request such access, we will provide you with all the information as required by law.

9.1.b) The right to data portability. You may also obtain a copy of any Personal Information that we hold about you in our records in a format compatible and structured to allow you to exercise your right to data portability when the processing is based on your consent or on the performance of an agreement between you and us.

9.1.c) You may also request that we correct, amend, erase, any information which is incomplete, out of date or inaccurate.

9.1.d) The right to restrict processing. You can request the restriction of the processing (i) if you wish to restrict processing of your Personal Information rather than deleting it despite the fact that the processing is unlawful, (ii) if you wish Callaba to keep your Personal Information because you need it for your defense in the context of legal claims.

9.1.e) The right to delete your Personal Information. You can request the deletion of your Personal Information if (i) your Personal Information is no longer necessary for the purpose of the data processing, (ii) you have withdrawn your consent on the data processing based exclusively on such consent, (iii) you objected to the data processing, (iv) the Personal Information processing is unlawful, (v) the Personal Information must be erased to comply with a legal obligation applicable to Callaba.

9.1.f) The right to object to the processing of your data. You have a right to object to our use of your Personal Information for our own purpose at any time. In other words you can withdraw your consent to processing your Personal Information by us. In case you want to exercise this right, you may contact us. This right also includes the right to object to processing your personal information for marketing and advertising purposes.

9.1.g) You also have the right to lodge a complaint with the competent supervisory authority. In Estonia, this is Data Protection Inspectorate (Andmekaitse Inspektsioon) - <https://www.aki.ee/et>.

9.2. In case you want to exercise your rights, please contact us. Our Data Protection Office is reachable via support@callaba.io.

9.3. There are exceptions to these rights, however. For example, access to Personal Information may be denied in some circumstances if making the information available would reveal Personal Information about another person or if we are legally prevented from disclosing such information. In addition, where some of the data is necessary to maintain Callaba or where that is a legal requirement, we may retain such data for the period it is needed or required even if you withdraw your consent or cancel your account. Such information will not be considered as subject to erasure.

10. DECLARATIONS OF CONSENT

10.1. By checking the respective box (or giving consent in other similar way) as a part of the registration process or by utilizing the Website, the User agrees to this Policy and agrees to the data processing as described herein.

10.2. The User has the right to withdraw his consents at any time via mail to Futurecomes Family PLC, Harju maakond, Tallinn, Põhja-Tallinna linnaosa, Randla tn 13-201, 10315, or via E-Mail to support@callaba.io. The withdrawal of the consent does not affect the lawfulness of processing based on consent before its withdrawal.

11. CHANGES TO POLICY

11.1. This Policy may be amended at our full discretion without prior notice. We encourage you to review it periodically in order to be aware of the changes we may have made. Reading it carefully and checking for any modifications is your responsibility. By using the Website, you accept and agree to the Policy and the Terms and Conditions.

12. CONTACT US

12.1. If you have any further questions about this Privacy Policy or the processing of your Personal Information, please contact our privacy team: support@callaba.io.