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# Privacy Policy

Railsware Products Studio, Inc., United States of America company registered office: 118 Coalpit Hill Road, Danbury, CT 06810, USA ("Railsware", "us", "our", or "we"), focuses on assuring that the Coupler.io (the "Product", "Application") provides a safe environment for its customers ("Customer", "You") and users ("User"). We need to collect, process and store some Personal and Navigational information in order to provide you with an ability to use the Product and subscribe to it, make online payments, submit support and feature requests for our consideration.

We are dedicated to protecting your privacy. We never sell Personal Data and we carry out all processing operations in strict compliance with applicable global privacy and data protection laws.

This Privacy Policy (herein the "Policy") applies to the Site and the Product, and it administers the ways we collect, process and store data. The Policy has a direct reference to the Terms of Use and applies to it. It also explains how website visitors, Product users and Customers can exercise their rights to know, obtain, access, erase, use, delete or rectify their Personal Information that was of their own free will submitted to us.

When you subscribe to the Product, use the Product, leave support requests, submit product ideas, fill out a survey, or perform an online payment, you give consent and fully agree to the Policy under which Railsware collects, processes, uses, stores and discloses Personal Information. If you do not agree with the points stated in this Policy, you should not subscribe to any of the Product's Subscription plan, use the Product, perform an online payment, submit support requests and product ideas, or perform other activities, which may result in supplying us with your Personal and Navigational Information.

## 1. Product User, Customer and Site Visitor Data

### 1.1. Personal Data You Provide

When you register or subscribe to the Product, use the Product, make an online payment, participate in a survey, email us or in any other way submit your Personal Information to us, Railsware may collect, process and store the following data: your name, email, your bank card details, and your billing address.

You will know when we gather your data through Google's pop-up form which suggests to use the Google Account in order to activate the Product and informs you about the information Google will share with us once you activate it.

When you install the Product, you perform an action which authorizes Google to share your data with us. By doing so, you provide Railsware with access to all Google Sheets data that your Google Account has access to.

We will keep a record of your Subscription Plan, purchases, any marketing-, sales- and support-related communication and replies, general Product usage statistics in order to provide you with the high level Product quality and support services.

## 1.2. Data We Collect Automatically

Railsware may collect information through our Site, Product and the GSuite Marketplace listing.

The data we gather from your device: its type, IP address, the browser you are using, OS (operating system), as well as the referral site from which you entered the website or Coupler.io GSuite Marketplace listing. We may also monitor your online behavior, including the time of your visit, your online activity at the website including the URL clickstream through the Coupler.io website, the pages you visited, the time you spent viewing them, and the frequency of your visits.

We gather this data automatically through the commonly used data-gathering technologies, like cookies and web beacons in order to understand how Customers and website visitors browse the Website, the GSuite Marketplace listing and use the Product. This data helps us manage the Website and the Product, analyze general online behavior and usage trends, and provide targeted advertisements. We also collect demographic information about our Product users and Customers, as well as Website and GSuite Marketplace listing visitor base that helps us tailor both the Website's content and the Product functionality in order to meet your expectations and requirements.

When you browse the Website or GSuite Marketplace listing, use the Product, we collect Personal and Navigational Information along with unique User IDs. In addition, we aggregate extra data that refers to the user flow, such as the start and the end of a web session, page views, purchase and checkout. We may associate this data with the information we store within the analytics software to Personal Information that you submitted to us. We do this to enhance our Product and Website content and UX, as well as use this data to improve the Product functionality, our marketing communication and analytics.

## 1.3. Google Sign-in Authentication

You install our Product using Google Sign-in authentication system. When you use Google Sign-in authentication, you give us access to your full name and email address. This data is stored by us in compliance with the Privacy Policy. The Google Sign-in authentication system will also let you know that by installing the Product you will be asked to allow the Product to:

- See, edit, create and delete your spreadsheets in Google Drive
- Connect to an external service

- Allow this application to run when you are not present
- Display and run third-party web content in prompts and sidebars inside Google applications

## 2. Types of Information

### 2.1. Personal Information

Under ‘Personal Information’ we understand any data that you of your own free will provide us with, such as your first and last name, phone number, your email address, company name, your billing address, your IP address, geographical location, as well as any other information that refers to you or your workplace (business). We also collect Client ID that is assigned to your browser, and User ID that is associated with the use of the Product and your Coupler.io account.

Personal Information also refers to other information that is available on the internet, such as from Facebook, LinkedIn, Twitter and Google, and includes any other publicly available data that you previously agreed to share and that is available from public databases and other service providers.

#### 2.1.1 Categories of Personal Information

Railware has collected the following categories of Personal Information from its Users and Customers within the last twelve (12) months.

Category	Description	Sources	Purpose of collection
Identifiers	First and last name, phone number, email address, company name, bank card details, billing address, IP address. We also collect Client ID that is assigned to your browser, and User ID that is associated with the use of the Product and your Coupler.io account.	Coupler.io Product Customers and Users on their free will input this information on one of the coupler.io web pages or when installing the Product from the GSuite Marketplace, or upgrading to a paid plan. Client and User IDs are assigned automatically using cookies which track visits to the Website, the Product, and the GSuite Marketplace listing.	To fulfil the obligations Railware took as the Product provider and Website owner.  See Article 3.3 and 3.4 of this Privacy Policy for more information.
Usage of Site, GSuite Marketplace listing and Product	Information on the User interaction with Website, GSuite Marketplace listing and Coupler.io Product: data which	Railware uses cookies, web beacons and other technologies which are embedded into the Coupler.io Site, the GSuite Marketplace listing, Product and its pages	To enhance user experience while browsing the Website and using the Product for your projects.  See Article 3.3 and 3.4 of this

	refers to your computer and your visits to the Site and the Product such as your browser type, referral source, length of visit and pages viewed.	to collect this data.	Privacy Policy for more information.
Geolocation data	Geographical location which refers to your computer and your visits to the Website, the GSuite Marketplace listing and the Product.	Railsware uses cookies, web beacons and other technologies which are embedded into the Coupler.io Website, the GSuite Marketplace listing, Product and its pages to collect geolocation data of a user limited to country, state, and city.	To have a better understanding of the Product User and Customer base.  See Article 3.3 and 3.4 of this Privacy Policy for more information.

## 2.2. Navigational Information

'Navigational Information' refers to your use of the Product's app and browser versions, browser type, IP address, referral source, OS (operating system), geographical location, length of visit and pages viewed, as well as the general Product usage statistics.

### 2.2.1. Cookies Definition and Categories

Cookies are small files which are received from a web server and are either stored on your web browser until its expiry date, or until the end of each session. You may not agree to accept cookies and refuse them.

Our Website, GSuite Marketplace listing and Product incorporate different cookies that are divided into several categories:

- **Essential** cookies are necessary to provide you with our Website's and Product core services and functionality, such as enable Application sign-in.
- **Analytics** cookies help us understand how our Website and Product are being used, how good our marketing campaigns perform, and based on the information - customize and enhance both the Website and Product for you.
- **Performance** cookies improve the Site's and Product performance by leveraging non-essential functionality, such as allowing remembering the last position a Website's visitor or a user watched a video before this process was interrupted due to problems with internet connection or other reasons.

## 2.2.2. Cookies Served Through our Website, GSuite Marketplace and the Application

Cookie Name	Category	Expiration Date	Description	Company or service that provides this cookie	How to opt out
_ga	Analytics	2 years	Used to distinguish users.	Google Analytics	To refuse these cookies, please follow the general browser rules explained in the 'Disabling Cookies' part of this Privacy Policy, or visit this page:  <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a>
_gid		24 hours	Used to distinguish users.		
_gat		1 minute	Used to throttle request rate.		
__dc_gtm		1 minute	Used to throttle request rate (if Google Analytics is deployed via Google Tag manager).		
__stripe_mid	Essential	1 year	Fraud prevention and detection.	Stripe	Note: if you refuse these cookies, you won't be able to make a payment on the Coupler.io Site and, therefore, won't be able to use any of our paid Subscription Plans.
__stripe_sid		30 mins	Fraud prevention and detection.		
_couplerio_session	Essential	Expires when browser session ends.	Used to store information about user session.	Coupler.io	Note: if you refuse these cookies, some of the Site content or the Application functionality will not be available to you.

					If you still want to refuse these cookies, please follow the general browser rules explained in the 'Disabling Cookies' part of this Privacy Policy.
hide_cookie_consent		1 year	Used to remember when a website visitor clicked the accept button when giving consent to the Privacy Policy and Terms of Use published on the Coupler.io Site.		

### 2.2.3. Disabling Cookies

Website visitors and the Product users have the right to opt out from using the cookies on the Site and as part of the Product. To reject these cookies you can either follow the instructions provided in the table above, or amend your web browser settings and either accept or refuse these cookies.

Opting out from the Essential cookies may result in not being able to access certain functionality that is available on our Website and as part of the Product.

Here are the links to different web browsers where you can amend your browser preferences, and either enable or disable cookies:

- Microsoft Internet Explorer: <https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies>
- Google Chrome: <https://support.google.com/accounts/answer/61416>
- Safari: [https://support.apple.com/kb/PH21411?locale=en\\_US](https://support.apple.com/kb/PH21411?locale=en_US)
- Mozilla Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

In addition, you can also opt out from the targeted advertising, like Google Adwords. In order to do so, please visit <https://support.google.com/ads/answer/2662922?hl=en>

#### 2.2.4. Web Beacons

In addition to cookies, we may use other technologies, like web beacons to track user behavior on the Website and the Product. In contrast to cookies, web beacons are small pieces of code (pixel) embedded into the website.

Web beacons provide the data on what pages website users visit and when, allowing to group them by shared behavior and advertise to them. Web beacons may also rely on cookies that help record such activities, as conversion. That is why disabling cookies may result in incorrect web beacon functioning.

### 2.3. Product Content

When you add a new Importer or, in other words, connect a new Data Source to the Product, Railsware through the Application UI interface will collect and store the credentials of the connected Data Source account. These credentials may include passwords, OAuth tokens or any other credentials required for our Product to be able to load data from a third-party system. Our Application requires this information in order to provide the Services to you.

To transfer your data from a Data Source to a Data Destination, Railsware acts as an intermediary for a very short period of time. Railsware does not store the transferred data after it was imported to a chosen by you Data Destination.

When you delete an Importer from the Product's sidebar, as well as delete the corresponding to this Importer connected Data Source account, Railsware will delete all previously collected and saved credentials for the corresponding Data Source, like Jira, Google Sheets, etc.

With Google services, our Product's data access rights are limited to your Google Sheets data. We are not able to access any other data related to your Google account. You can revoke Product's right to access data at any point in time from your [Google Account control panel](#). You should also review Google's [Terms of Service](#) and [Privacy Policy](#), as you will be bound to these terms when you connect to and fetch your data from third-party systems.

### 2.4. Sensitive Information

Railsware does not intentionally collect, and both Customers and Users should not provide any information about your medical or health conditions, race and ethnic origin, political opinions, religious and philosophical beliefs, as well as bank account information, TAX and passport numbers, driver's license or other similar personal identifiers.

We do not store your bank card details on any of our internal resources / databases, but transfer them instantly to the Payment Card Industry Data Security Standard compliant service provider for further processing. When receiving an online payment, we collect shipping and billing address(es), your card details: number, cardholder name, card number, expiry date, Postal Code and the Card Security Code (CSC) or the Card Verification Value (CVV).

## 3. Use of the Information We Collect

### 3.1. Compliance with this Privacy Policy

Railsware uses the data it collects only in compliance and according to this Privacy Policy. Therefore, Product users should carefully read this Privacy Policy and other agreements published before proceeding with subscribing to or using the Product.

### 3.2. We Never Sell Personal Information

Railsware does not, and will not, sell Personal Information.

### 3.3. How We Use the Information We Collect

We use the Personal Information we collect from our Product users to:

- Enable smooth functioning of our Product, allowing Customers and Users load data from third-party systems (Data Sources) to other systems, Data Destinations (for example, Google Sheets)
- Enhance Product's services
- Manage the Product security and system administration
- Create accounts and provide information to a PCI-compliant service provider for payment processing
- Respond to customer support and other Product-related requests
- Communicate with the Product users, inform them about important product- and company-related updates
- Contact the carefully-selected Product users to inform about other Railsware products and services that we think may be of interest to them
- Distribute other personalized marketing information
- Hold surveys, send out questionnaires that help us understand our customer requirements and expectations from the Product, support or any other services that we provide
- Put together and analyze the statistic data of the Product usage
- Conduct an investigation of unauthorized access and use of Product, fraud, breach and other illegitimate actions

### 3.4. Use of Navigational Information

We use Navigational Information to operate and improve the Website and the Product. We may also use Navigational Information alone or in combination with Personal Information to provide you with personalized experience while using Coupler.io Product or navigating the Website.



### 3.5. Use of Bank Card Information

The bank card details you provide when registering for a paid Coupler.io Subscription plan are neither stored nor processed by Railsware, but are passed over to Stripe for processing. This third party stores your data in order to charge you on a monthly or annual basis for the Coupler.io Product services. The billing process will continue until you cancel a Paid Subscription Plan, uninstall the Product, or request us to delete your Product account, or when you remove your bank card details from your Coupler.io account.

### 3.6. Service Providers

Railsware may employ other organizations and persons ("Agents) to perform tasks or provide services to Product users and may need to share your Personal or Navigational Information with them to provide information, Products, and Services to you. These tasks and services may include marketing and support activities, analyzing different types of data, providing auditing, security, development and testing, as well as advisory and legal services. In all the cases when Railsware shares your information with such Agents, we will request for the agent to accept and strictly observe our Privacy Policy.

### 3.7. Data Security

Railsware applies different security technologies, guidelines and procedures to ensure complete security, as well as full confidentiality of the Personal Information you provide. We also take measures to avoid unauthorized access to personal data and electronic communication systems.

The transfer of bank card details to an authorized third party happens through the use of encryption (such as the Secure Socket Layer protocol and the Transport Layer Security) which guarantees complete safety and security of your data.

Railsware applies an encrypted [JSON Web Token](#) mechanism to verify access to a Product account and identify a User, providing a secure environment for all authorized Users to use the Product.

For any questions that relate to the security of your Personal Information, please email us at [contact@coupler.io](mailto:contact@coupler.io)

### 3.8. Data Retention

Railsware will retain your Personal Information for the period required to fulfill the obligations it took as a Product provider, or unless a longer period of time is required by law for tax, legal or other regulatory reasons. Railsware will delete all Personal Information at the earliest date per your request.

Railsware stores Product usage information in log files except for Personal Information and Data Source settings. No passwords, OAuth tokens, Google Drive URLs or any other credentials are stored in log files as well. The retention period of logs is 30 days.

### 3.9. Social Media Features

The Website incorporates some social media features and widgets. It allows to 'Share' - for Facebook, 'Tweet' - for Twitter and 'Share' - for Google+ content on certain Site's pages. These social media features (buttons) may gather some website visitor-related (IP address, page visits) information. The actions connected to the social media features and widgets are covered by the policy of the company which enables them.

### 3.10. Links and Third-Party Sites

The Coupler.io Website includes links to Third-Party Sites. These Sites may offer certain services to end-users. Railsware does not take any responsibility for their content, services, administrators, practices and policies, and does not endorse them. Railsware also does not bear any responsibility for the privacy of information that you submit on these resources, since this Privacy Policy does not apply to them. We recommend you to familiarize with the Privacy Policy and other legal documents before submitting or sharing any personal information with them.

### 3.11. Third-Party Services

The Website includes third-party systems that allow for support request or product-related idea submission, as well as adding comments to articles published on the website blog. The system, which accepts support requests and product ideas, provides us with the name and email of a user who submitted it, so that our team can take action and respond to these messages. The system, which enables users with the right to publish comments, performs Personal Information collection, storing and processing on its side, giving us the right to monitor the comments that appear on the Website's blog.

### 3.12. International Transfer of Information

To perform our operations, we may transfer and access Personal Information from around the world, including the United States, the EU, and other countries. While transferring the data, we take the necessary measures to safeguard the activity in general, and the data subjects in particular to ensure an appropriate level of protection for their fundamental rights. The Privacy Policy shall apply even if Personal Information is transferred or accessed from other countries.

### 3.13. Compelled Disclosure

Railware reserves the right to disclose personal data to public authorities in accordance with a legal liability to perform their duties, such as customs and tax authorities, financial investigation units, judicial administration and other parties if the EU or the Railware's representative member state law allows to exercise such disclosure in the public interest, including protection of your and other people's safety.

## 4. Data Subject Rights

### 4.1 Product User Rights

If you are our Product's User or Customer, you have the following rights:

- To request Railware to disclose what Personal Information it collects, uses and discloses (to request to know)
- To request access to your Personal Information
- To remove consent from being contacted by email, phone and other means of communication
- To request for all Personal Information that was received from you to be deleted from all our records
- To request that we update, correct or remove any omissions in your Personal Information that we store
- To opt out from all kinds of direct marketing and other communication
- To request us to delete your Personal Information
- To object to the processing of your Personal Information, or ask us to restrict the processing of your Personal Information, or request portability of your Personal Information
- To withdraw your consent from collection and processing of your Personal Information at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect the processing of your Personal Information conducted in reliance on lawful processing grounds other than consent.

### 4.2. How Data Subjects can Exercise their Rights

In order for Data Subjects to exercise any of the rights listed in the Article 4.1 of this Privacy Policy, please email your request at [contact@coupler.io](mailto:contact@coupler.io) After we receive your request, our team will verify your request. We will provide a response to your request within forty-five (45) days, informing you about the steps we have taken to ensure that your rights are exercised.

### 4.3. Opting Out from Our Communication

You may opt-out from our marketing communication by pressing the 'unsubscribe' link, which is located at the bottom of our email, or sending your unsubscribe request at [contact@coupler.io](mailto:contact@coupler.io)

You cannot unsubscribe from our transactional emailing (which also includes Welcome, Confirmation, Billing plan-related emails, invoicing, as well as Product updates), and other information which refers to your Coupler.io Product account.

#### 4.4. Children's Information

Our Product is not intended for children's use. We do not knowingly collect any data from children under the age of 16. If you think that we might have gathered some information from children under the age of 16, please let us know at [contact@coupler.io](mailto:contact@coupler.io) and we will delete this data from our databases and other applicable resources if any.

### 5. Sub-processors

Railsware uses a range of third-party sub-processors that are authorized to process the Product user and customer data, and help us deliver the Product functionality, as well as the accompanying support services in full.

<b>Entity Name</b>	<b>Purpose</b>	<b>Location</b>
Google Inc.	Infrastructure	United States
Amazon Webservices, Inc.	Infrastructure	United States
Heroku, Inc.	Infrastructure	United States
New Relic, Inc.	Infrastructure	United States
Help Scout, Inc.	Customer support	United States
MailerLite UAB	Transactional and marketing emailing	Lithuania
SendGrid, Inc.	Transactional and marketing emailing	United States
Mailtrap.io, Railsware Products Studio, Inc	Transactional and marketing emailing	United States
Stripe, Inc.	Payment processing	United States

Disqus, Inc.	Reader comments	United States
Typeform SL	Customer feedback	Spain
WPENGINE, Inc.	Infrastructure for blog	United States
LinkedIn Ireland Unlimited Co	Marketing analytics	Ireland
Twitter, Inc.	Marketing analytics	United States
Facebook, Inc.	Marketing analytics	United States
Slack Technologies, Inc.	Communication	United States
Hotjar Ltd	Marketing Analytics	Malta
Microsoft Clarity, Microsoft Corporation	Marketing Analytics	United States
Retyp, LLC d/b/a OptinMonster	Marketing Analytics	United States

## 6. General Clauses

### 6.1 Changes to the Privacy Policy

We reserve the right to review and make amendments to this Policy. When the changes are made, we will update the Privacy Policy and amend the 'Last modified' date, which is indicated in the top left corner of this Policy, to the day when the latest amendments were made.

### 6.2 Contact us

For any additional questions or inquiries about the Privacy Policy, please send an email at [contact@coupler.io](mailto:contact@coupler.io)