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Privacy Policy

Railsware Products, 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") provides a safe environment for the Google Sheets add-on 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 requests and product ideas for our consideration.

We are dedicated to protecting your privacy. This Privacy Policy (hereinafter the "Policy") applies to the Product and administers the ways we collect, process and store data. The Policy has a direct reference to the Product's Terms of Use and applies to it. It also explains how Product users and customers can exercise their rights to obtain, access, erase, use 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.

Railsware is not established in the European Union, but it processes and stores Personal Data of EU citizens, who subscribes to the Product Subscription plan, submits support requests, performs online payment, or other activities, which may result in supplying us with their Personal and Navigational Information.

1. Customer Data

1.1. 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 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 Product which comprises app and browser versions, browser type, OS (operating system), geographical location, as well as the general Product usage statistics.

We gather this data automatically through the commonly used data-gathering technologies to understand how customers use the Product. We do this to enhance our Product functionality, as well as our customer 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 posting and billing address, as well as any other information that refers to you or your workplace (business). 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 other service providers.

2.2. Navigational Information

'Navigational Information' refers to your use of the Product such as app and browser versions, browser type, OS (operating system), geographical location, as well as the general Product usage statistics.

2.3. 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.

Railsware does not collect any bank card numbers when you subscribe to the Product.

2.4. Other Information

When you add a new Importer or, in other words, connect a new Data Source to the Product, Railsware through the Product 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 Product requires this information in order to provide the services to you. 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 <u>Google Account control panel</u>. You should also review the Google's <u>Terms of Service</u> and <u>Privacy Policy</u>, as you will be bound to these terms when you connect and fetch your data from these systems.

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 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 various third-party systems (Data Sources) to 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

3.3 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 data, products, and services to you. These tasks and services may include marketing and support activities, analyzing different types of data, providing 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.

3.4 Personal Information 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.

Railsware applies an encrypted <u>JSON Web Token</u> 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 coupler@railsware.com

3.5 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.

3.6 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.

3.7 Compelled Disclosure

Railsware 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 Railsware'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 access to your Personal Information
- To remove consent from being contacted by email, phone and other means of communication

- To request for all Personal Data 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.

In order to exercise any of these rights, please email us at <u>coupler@railsware.com</u> We will provide a response to your request as soon as possible, informing you about the steps we have taken to ensure that your rights are exercised.

4.2 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 coupler@railsware.com

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 Product account.

4.3 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 coupler@railsware.com 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.

Entity Name	Location
Google Inc.	United States
Heroku	United States
Help Scout	Help Scout

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 coupler@railsware.com