

# Privacy Policy

## WHAT IS IT ABOUT?

This document outlines our procedures for collecting and processing user personal data, describing the relevant processes and informing users of their data rights. We want you to have a clear understanding of how your data will be processed.

We also require individuals who have not reached the age of 18 (i.e., adulthood) to cease using our website. Additionally, if the local legislation of the country where you are a resident imposes a higher age requirement for using SALESCHIEF services, that higher age requirement shall apply.

## 1. APPLICABLE TERMS

In this document, we will be using specific terms. It is important for us that we interpret them consistently with you. That is why we have created this section.

1.1. **We** refers to FireFly Tech Oy, a limited liability company with its principal place of business at Sienimäenkatu 7 C 24 55510 Imatra, Finland.

1.2. **SALESCHIEF service** denotes the object of intellectual property rights, namely the computer program (software product) namely "SALESCHIEF," accessible to users via the internet on the website.

1.3. **Visitor** means an individual who accesses the website but does not have a registered account.

1.4. **Account** refers to the tool that provides access to the SALESCHIEF service. It features a virtual section on our website for configuring, managing, and controlling the SALESCHIEF service, selecting functionality, adjusting project settings, viewing usage statistics, and more.

1.5. **Website** means our internet resource located at the address: <https://saleschief.ai/>

1.6. **Our email** refers to a specially created email address by us: [maksim@saleschief.ai](mailto:maksim@saleschief.ai), used for communication with data subjects regarding the collection and processing of their personal data, including processing instructions regarding personal data.

1.7. **GDPR** refers to the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), available at the following link: <https://eur-lex.europa.eu/eli/reg/2016/679/oj>

1.8. The terms: "**Personal data**", "**Sensitive data**", "**Controller**", "**Processor**", "**Processing**", "**Data subject consent**", "**Data subject**" and "**Personal data breach**" carry the meanings as defined by the GDPR.

## 2. OUR ROLES

2.1. When using our website without registration we act as the data controller (as we independently determine the purposes and means of processing the personal data received), and the visitor is the data subject (as you share your personal data with us).

## 3. PURPOSES OF PROCESSING

3.1. **The purposes of processing your personal data.** The processing of such information serves the following purposes:

- a. account registration in the SALESCHIEF service;
- b. marketing and communication with you;
- c. compliance with legal requirements;
- d. ensuring and/or enhancing the level of security of the SALESCHIEF service;
- e. investigating fraud, spam, improper or illegal use of the SALESCHIEF service;
- f. improvement of the SALESCHIEF service as a product;
- g. proposal for you to enter into a contract and the related communication.;
- h. other purposes expressly provided for by current legislation or a requirement of a governmental authority.

We acknowledge that any purposes not explicitly stated in this paragraph are limited to our own use.

#### 4. BASIS OF PROCESSING

Until you have an Account with the SALESCHIEF service, we may obtain your personal data through the following ways:

- a. From direct communication with you;
- b. By collecting information necessary to provide support, resolve inquiries, or facilitate access to our services.

##### 4.1. THE LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

- a. **If you are the visitor:**
  - Personal data collected through cookies:**

When using cookies, we rely on the visitor's consent for the processing of their personal data for one or more purposes outlined in section 3.1 of this Policy. This includes the description of technologies, their types, the categories, and purposes of collecting personal data, as well as the procedure for providing, modifying settings, or withdrawing consent for the processing of personal data.
- b. **Any other personal data:**

We rely on legitimate interest as the legal basis for the collection and processing of personal data that we obtain for and as a result of communication with you (including the use of email, technical support services, or the "Contact Us" module). Our legitimate interest includes:

  - Offering and coordinating the use of the website and/or SALESCHIEF service;
  - Providing technical support for the use of the website and/or SALESCHIEF service;
  - Clarifications regarding payments or specific features of the SALESCHIEF service;
  - Investigation, assistance, or advice on issues related to illegal activities prevention or IT system security breaches.

**Note:** The "Contact Us" module is located in the bottom right corner of our website screen. If cookies essential to website functionality are disabled, this module may not be accessible.

##### **If you are not the visitor:**

The legal grounds and methods for collecting and processing personal data are determined based on your interactions with the platform or through terms established at the point of registration or service usage.

#### 5. CATEGORIES OF PERSONAL DATA

5.1. **Visitor's data.** We collect and process the following categories of visitor's personal data:

- a. **Identity Data:** includes visitor's location, preferences, IP addresses, device information, operating system, screen resolution, language, country you are located in, language and marketing preferences, the date and duration of your visit, visited pages, your GA ClientID, browsing history and activity on a website.
- b. **Contact Data:** This category comprises email addresses, phone numbers, voice, messenger identifiers and/or any other contact information that you may provide us through the communication with us.

## 6. PROCESSING

### 6.1. Our processing of visitor's Personal Data. we process such data based on the following principles and grounds:

- a. **Lawfulness, fairness, and transparency:** we process personal data based on your consent or on our legitimate interest, and this process is open and transparent. You can withdraw your consent and/or you may restrict our legitimate interest;
- b. **Purpose limitation:** we receive and process data solely for the purposes stated in Clause 3.1 of this Policy.
- c. **Data minimization:** we receive and process only the amount of data necessary to achieve our defined purposes;
- d. **Accuracy:** we enable you to maintain the accuracy of your personal data and will update them when necessary, according to your instructions;
- e. **Storage limitation:** we retain the received personal data only for the necessary period to achieve the defined purposes (clause 6.7. of this Policy);
- f. **Integrity and confidentiality:** we ensure an appropriate level of protection for the personal data we receive, safeguarding them against unauthorized access, loss, or damage.
- g. **Accountability:** we are responsible for complying with this Policy, ensuring proper processing of personal data and ensuring our activities align with the requirements of the GDPR.

**6.2. Your instructions.** We process your information based on your instructions. Your instructions encompass the actions and settings performed within the website, as well as the instructions that we obtain from you through our communication.

**6.3.** However, if we are unable to fulfill any of your instructions regarding the processing of personal data at any point during our cooperation, we will notify you of the impossibility and may refuse further use of the personal data received from you. In such cases, we will delete all personal data received from you, and you acknowledge that our actions cannot be considered a violation of your rights and/or interests or cause harm.

**For example.** You have contacted us through the "Contact Us" module with a question regarding the use of one of the features of our product. For communication purposes, you provided the email address maksim@saleschief.ai and requested a response to be sent to that address. After we sent a reply to the email address you provided, we received a message (for example, from the same email address or through the "contact us" module) requesting an explanation regarding:

- a. how we obtained this email address,
- b. why we are sending messages to it,
- c. why we are processing it (email as a personal data),
- d. to delete the email from all our databases (right to be forgotten).

Since we cannot independently verify whether the email address belongs to you or another person (the party who sent us the aforementioned requests), we are obliged to comply with the demands of the party contacting us and delete the corresponding data from our servers.

Our actions in this matter are justified by the balance of interests between the individual who may actually own the specified email address, your interest in communicating with us or receiving subsequent consultations regarding the capabilities of our product, and the interests of the individual who does not actually own the email address (if the party who sent us the specified requests has no association with the email address). In our view, the right to erasure (as well as other rights provided by the Regulation) of the individual who may genuinely own the email address prevails over the interests of other individuals in such situations.

In all similar cases (i.e., when we receive instructions from a third party regarding their personal data and cannot verify the identity of the data subject), we will consider the individual making such request to be the data subject, and therefore, we will prioritize the execution of such instructions.

**6.4. Our warranties.** We guarantee and commit to:

- a. complying with GDPR requirements and notifying you in case of any non-compliance.
- b. never sell your personal data or disclose it to any other persons or in any manner not outlined in this Policy.

**6.5. Automated Decision-Making.** We do not use automated decision-making technologies and/or algorithms in SALESCHIEF service and Website.

**6.6. Processing Period.** The commencement of the processing period of your personal data shall be the day on which you accepted the terms of this Policy. The termination of the processing period for personal data, depending on the circumstances, shall be:

- a. the last calendar day of the fifth year from the day you last used SALESCHIEF service, or
- b. the day you withdraw your consent for the processing of personal data

**6.7. Liability.** We are fully responsible, in all applicable cases, for ensuring that the collection and processing of personal data comply with GDPR requirements, as well as for any consequences resulting from the breach of Regulation provisions.

## 7. YOUR RIGHTS

**7.1. Information.** Receive clear and understandable information about what personal data is being collected, how it is used, with whom it may be disclosed, and how long it will be retained. All of this information consists at scope of our documents: this Policy and Terms of Use. may also always contact us with any request regarding your personal data at the Our email;

**7.2. Access.** Request a copy of Your personal data held by Us and obtain information about its processing. To exercise this right, please contact us via email at Our email and we will provide you with a copy of your personal data;

**7.3. Rectification.** Request the correction of inaccurate or incomplete personal data concerning them. You can do this yourself in your Account or provide us with instructions by sending them to Our email;

**7.4. Erasure (right to be forgotten).** Delete your personal data when it is no longer necessary for the purposes for which it was collected or when you withdraw your consent. You can do this yourself by providing us with instructions by sending them to Our email (Except where this right is restricted in accordance with the provisions of Articles 17 and 18 of the GDPR);

**7.5. Withdraw consent.** Withdraw your consent at any time. You can withdraw your consent at any time by sending us a corresponding message to Our email;

**7.6. Restriction of processing.** Restrict the processing of your personal data under certain circumstances, such as disputing the accuracy of the data or the lawfulness of its processing. To exercise this right, please contact us via email at Our email and we will restrict Your personal data in accordance with your instructions;

**7.7. Data portability** Receive your personal data in a structured, commonly used, and machine-readable format and transmit it to another organization, where technically feasible. To exercise this right, please contact us via email at Our email and we will provide you with a copy of your personal data.

**7.8. Object.** Object to the processing of your personal data based on our legitimate grounds. For example, this may occur when you believe that the processing of your data infringes upon their rights and freedoms, or when you/they do not wish their data to be used for direct marketing purposes. To exercise this right, please contact us via email at Our email and we will provide you with a copy of your personal data.

**7.8. Lodge a complaint.** Lodge a complaint with the relevant data protection authority if you believe that your rights regarding the protection of personal data are violated. Here is a list of all the supervisory authorities responsible for personal data protection in the EU: [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en).

## 8. PRIVACY AND SECURITY

**8.1.** Considering the current advancements in technology, implementation costs, nature, scope, context, and purposes of the Processing, as well as the varying risks associated with potential harm and the severity of such harm (its impact) on the rights and freedoms of data subjects, we employ suitable technical and organizational measures to ensure an appropriate level of security commensurate with these risks. These measures may include those outlined in Article 32(1) of the GDPR.

**8.2.** During the provision of the website and SALESCHIEF service, we assess the appropriate level of security by taking into account the risks associated with the Processing, particularly those arising from potential breaches of personal data security.

**8.3. Privacy of communication.** We guarantee the security of the content of your communication with us.

**8.4. Actions in the event of a Personal data breach.** We will promptly notify you of any security incident (personal data breach) affecting your information. In such cases, we'll offer detailed information to help you meet notification obligations to data subjects and regulatory authorities. We will strive to localize, minimize, and assess the impact of the breach as per GDPR requirements. Our actions will focus on reducing harm to data subjects, and notifications will be sent using available contact details.

## 9. OTHER

**9.1. Changes.** In line with our ongoing efforts to enhance personal data processing procedures and expand the features of the SALESCHIEF service, you acknowledge and agree that we retain the right to modify this Policy at our sole discretion, at any time. We will inform you about any changes by sending a notification to the email address associated with your Account. Additionally, if you have opted out of receiving such email notifications, we will provide a link on this page to access the previous version of the Policy at the time of each update.

**9.2. Communication.** When you contact us through our website, using methods such as the contact form or online chat, we request your contact information (e.g., name, email address) along with a summary of the issue and any supporting documentation, screenshots, or relevant information. This data is utilized to address your inquiries. For emails we send, analytics tools may be employed to track actions such as email opens, link clicks, or banner interactions, aiding us in assessing the effectiveness of our communication and marketing efforts. If you request a phone call, we ask for your contact phone number. During the call, you may share

personal information, which we may use to enhance the SALESCHIEF services and for marketing purposes. Phone calls for these purposes may be recorded.

You may receive notification emails regarding product updates, legal documents, customer support, or marketing emails. You can opt out of these messages at no cost (an unsubscribe button is provided at the end of each email). Exceptions include cases required by law (e.g., notifying you of a data breach) or for facilitating the normal use of the SALESCHIEF service (e.g., service messages for password recovery).

**9.3. Account registration.** When the visitor create an account data processes for the purposes of operating our website, identification you as a user, providing the SALESCHIEF services (e.g. sending reports), ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you.