



# Principles of Personal Data Protection

in conformity with the EU-U.S. Privacy Shield Principles

(last update: 15/03/2019)

For us, the **RAYNETCRM, LLC** company, with registered office at 4213 Expedition Way, Osprey, Florida 34229, the **safety and stability of services provided** is an absolute priority. An integral part of fulfilling this priority is also our commitment to make maximum efforts to protect your right of privacy.

In this document, we describe the manner in which we process your personal data within the provision of our services. We have tried to describe the principles as simply as possible; however, if you do not understand some of the terms or if you have any questions regarding the function of Raynet Cloud CRM, please do not hesitate to contact us with your questions (see the chapter "[Contact Us](#)").

Further, you can learn:

- how we collect personal data;
- how we use and share it;
- how we store and protect it.

Specifically, this involves the following services and activities as well as related categories of personal data:

- **RAYNET Cloud CRM** – we register identification and contact data (such as name and surname, e-mail, IP address) necessary for the operation of this product.
- **Communication** – we register identification and contact data (such as name, surname, e-mail, telephone, Skype, postal address, photographs) necessary for the provision and improvement of customer support and care, which we provide through various channels: e-mail, telephone, chat, idea maker, web conferencing, newsletter and others.

- **Marketing** - we register identification and contact data (such as name, surname, e-mail, device information) necessary for offering our services, sending the newsletter and better targeting of online advertising.

Further, you can learn more details on how we process your personal data.

## Notice

RAYNETCRM provides information in the company's Privacy Policy about its Individual Personal Data practices, including the types of Personal Data RAYNETCRM collects, the types of third parties to which RAYNETCRM discloses the Personal Data and the purposes for doing so, the means and choices Individuals have for limiting the use and disclosure of their Personal Data, and how to contact RAYNETCRM about its practices concerning Personal Data. Privacy notices pertaining to specific data processing activities also may contain relevant information.

## Personal data that we collect

We collect information to be able to operate our services and further improve these services.

We collect information in the following manner:

- **Information you transmit to us** – such as:
  - Our cloud service RAYNET Cloud CRM (hereinafter the “cloud service”) requires for its operation your registration, during which we ask you to enter your e-mail, name and surname.
  - If you wish for a phone consultation, you enter your initials and phone number in our web contact form.
  - To subscribe to the newsletter, you enter your e-mail.
- **Information we obtain during use of our services** – if you visit our website or use our cloud service, we automatically save some information in the server protocols. This information includes:
  - **Information on the device** – we collect information on the specific device and its operating environment (such as the operating system and its version, screen resolution, browser type and version).
  - **Cookie files** – these are small text files saved in your computer or mobile device during your visit to websites. They facilitate memorizing your activities and preferences for a certain time so that you do not have to enter them again when returning to the site or switching from site to site.
  - **Pixel marks** – some sections that you visit on our websites can also collect information by means of so-called pixel marks, which can be shared with third parties directly supporting our marketing activities and development of our services. However, information collected by means of these pixel marks does not enable identification of a specific person although it can be connected to your personal data.

- **Protocol information** – if our cloud service is used, we automatically save information created in the course of these interactions.
  - IP address of the device
  - Individual requests (date, time, type of request, performance parameters, flag whether the request has been satisfied successfully)
  - Information on failures and errors

With regard to Privacy Shield Framework, we process personal data for these purposes and pursuant to these legal titles (reasons for processing):

- **Identification and contact data only necessary for the operation of the RAYNET Cloud CRM cloud service**, based on the **execution of the contract**: [Conditions of the RAYNET Cloud CRM Software Application Usage](#); in as much as this a contractual requirement here, non-provision results in interruption of provision of this service. This data is saved for at least the period of using this cloud service and the subsequent archiving period (as specified in the conditions of provision of the application) and for no longer than 10 years after the expiry of this period.
- **Identification and contact data only for the provision and improvement of customer support and care based on legitimate interest** in assisting you in your difficulties, improving your user experience and increasing the benefit from using our cloud product. Non-provision of this personal data results in the impossibility of providing of customer support and care. This data is saved for no longer than 10 years after termination of the provision of the subject cloud service.
- **Identification and contact data only for marketing purposes based on legitimate interest** in informing you of innovations in the services we already provide to you and offering you further similar products and services. This data is saved for no longer than 2 years after the last provision of our services (such as sending of the newsletter).
- **E-mail only based on consent** to sending of marketing content or articles as well as other content published in our blog. If the consent is revoked, these marketing materials are no longer sent and this e-mail forgotten (deleted or anonymised). This data is saved for no longer than 2 years after the last sending of an e-mail with marketing content based on consent.

All data entered in your instance of the RAYNET Cloud CRM application is your sole property to which also all your rights apply according to the Privacy Shield Framework; at the same time, you are responsible for its correctness and content. **In no case do we make use of this data.**

- **Identification and contact data only for the purpose of identification in accounting documents to fulfil a legal obligation.**

## Use of this information

We use the information collected on you to provide you our services, and further support during their employment, to notify you of changes in our services as well as to improve our services. This information can further be used to inform you about additional services and products which we offer and which supplement those that you have already ordered or inquired about.

Specifically, this involves these cases:

- Your e-mail which you enter during registration of the RAYNET Cloud CRM cloud service is used for login and your unambiguous identification within your instance of this application. Moreover, the e-mail is used for the provision of user support and possible education as well as sending information on innovations and changes regarding this cloud service.
- If you fill in your phone number in your user profile in RAYNET Cloud CRM, you can use it for your identification if you call us by phone; we can also contact you on this number within the user support.
- Information which we automatically collect and profile if you use our services are utilized for error diagnostics, monitoring, evaluation and optimization of operation, as well as for statistics on the client environments in which our service is operated. Based on this information, we improve and optimize our cloud application, whereas no automated decision-making is employed for processing of all the above-mentioned personal data.
- The e-mail which you enter in the chat on our website or in the idea maker section will be used for feedback and further communication with you.
- If you contact us through other communication channels: telephone, Facebook, Skype and/or other social media, your contact (phone number, URL profile, Skype name, ...) will be saved and used for further communication.

In case you want to limit any of given personal information, see part: **Your rights**.

## Sharing information

- **For the purpose of external processing** – We provide personal data to subjects of these categories (types): accounting company, e-mail service provider and data storage provider, so that they can process it for us exclusively for the indicated processing purposes and pursuant to our instructions, in conformity with these Principles of Personal Data Protection and other pertinent measures to ensure the privacy and security of your personal data.
- **For legal reasons** – we can share your personal data with third parties if we are in good faith convinced that its sharing is reasonably necessary for the purpose of:
  - observance of laws or other legal regulations as well as judicial proceedings or response to a request from the public administration;
  - application of pertinent contractual terms including investigation of their potential violation;
  - finding, prevention or another procedure within the protection of legal claims of the RAYNET s.r.o. company (against fraud, for instance), in the case of technical difficulties and/or security problems;
  - protection against damage to health or property as well as the security of the

RAYNETCRM, LLC company, our users or the public as required or permitted by a legal regulation.

- **We can share data** that does not enable your identification (such as statistics and other aggregated data). That is, only information without any linkage to personal data.

## Where we retain personal data

For data storage, we employ the services of the hardware, network connection and data storage provider. With this provider, Amazon Web Services, Inc., we have concluded all the necessary contractual documentation in conformity with these Principles of Personal Data Protection and other pertinent measures to ensure the privacy and security of your personal data.

# Data security

**We give maximum priority to data security;** therefore, we endeavour to protect our clients against unauthorized data operations. We strive to adopt suitable technical and organisational measures and take all the necessary steps to ensure safe handling of your data in conformity with these principles.

Specifically, this involves the following safety measures:

- **Physical data security (Data Centre)** – The RAYNET Cloud CRM operation is secured by one of the biggest and state-of-the-art IT infrastructures in the world: Amazon Web Services (AWS). The AWS data centres constitute world leaders in the area of physical and software security, enabling resistance even to critical situations, such as natural disasters, massive hacker attacks or power failures. Regular stress and penetration tests are a matter of course.
- **Data transmission security (Network Security)** – All network communication is encrypted by means of a certified electronic signature (the same type is used by banks). The certification has been executed by the prestigious authority DigiCert®.
- **Security at the application level** – Data protection is based on granting access to the individual information groups to authorized persons only.
  - Naturally, the actual access to the application is secured by a unique user name and password.
  - RAYNET Cloud CRM contains a simple tool for the administration of user roles and groups. Thanks to this, it is possible to define data access rights to both individual user groups and totally individually.
  - All data transmissions are encrypted with the TLS protocol.
- **Backup** – Every day we execute a complete backup of data and files. The backup data is archived with a minimum 14-day history.
- **Monitoring** – All data accesses are monitored.
- **Minimization of accessing persons** – Access to personal data is restricted to only the employees of RAYNET s.r.o. who need to know it in order to process it and who are contractually bound by strict obligations to preserve confidentiality; in the case of breach of this obligation, they can be severely punished.

In addition, you are responsible for the selected access password that enables you access to the RAYNET Cloud CRM application and are obliged to keep it in confidence, while following our instructions. Although we verify your identity, you must not share your access data with anybody else and you entrust us with acting according to the instructions of any person who enters this data of yours. At the same time, we declare herewith that we preserve all passwords in a one-way encrypted form and their readable form is unknown and underivable to us.

Transmission of information via the Internet is never absolutely safe. Although we will make every effort to protect your personal data, we cannot guarantee the safety of data transmitted to our side. We cannot be responsible for any such transmission, but as soon as we have received your information, we will apply strict procedures and safety functions as protection against unauthorized access.

All data which you enter in your instance of the RAYNET Cloud CRM application is your sole property to which also all your rights apply according to the Privacy Shield Framework; at the same time, you are responsible for its correctness and contents.

**We do not have direct access to this data and do not work with it, except for the case in which you ask us to execute a data operation (such as data migration from another system, execution of mass data correction, execution of data analysis, etc.). Subsequently, this request is dealt with in a separate agreement. After execution of the requested data operation, all the pertinent data copies and access to the data are removed.**

## Your rights

If relevant in the given case, you have numerous rights in conformity with legal regulations for the protection of personal data, including:

- the right to raise an objection against processing;
- the right to approach and view personal data kept on you (name, email, picture, address, correspondence with RAYNET Cloud CRM support team);
- you can also ask us to make any necessary changes to ensure its accuracy and topicality;
- you can further limit the scope of personal data processed or disclosed in this way;
- the right to ask for transfer of your personal data to another organisation;
- you also have the right to erasure of your personal data, thus “to be forgotten”;
- you also have the right to revoke the granted consent to the processing of your data;
- as well as the right to invoke binding arbitration against this processing at the supervisory authority of the Office for Personal Data Protection.

If in case of need you require a copy of your personal data we store, this will be provided standardly to you free of charge (contact: [support@raynetcrm.com](mailto:support@raynetcrm.com)).

In case you want to limit the use and disclosure of your personal data for reasons other than what it was collected for, please contact [support@raynetcrm.com](mailto:support@raynetcrm.com).

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## Alterations of our principles of personal data protection

Any future alterations which we may make in this document will be published on our [website](#) and, if it is suitable and possible, you will also be notified of this alteration by e-mail. Your rights resulting from these principles of personal data protection will not be restricted without your express consent.

## Contact us

In compliance with the Privacy Shield Principles, RAYNETCRM, LLC commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact RAYNETCRM, LLC at: [support@raynetcrm.com](mailto:support@raynetcrm.com).

## Privacy Shield Panel

An individual is able to invoke binding arbitration. This is done through the Privacy Shield Panel and the procedure is described here: <https://www.privacyshield.gov/article?id=G-Arbitration-Procedures>

## Independent recourse mechanisms

Regarding the independent recourse mechanism available to investigate unresolved complaints: we choose to cooperate with the EU Data Protection Authorities (DPA) and have a DPA panel serve as our independent recourse mechanism.

RAYNETCRM, LLC commits to cooperate with EU data protection authorities (DPAs) and comply with the advice given by such authorities with regard to data transferred from the EU. RAYNETCRM, LLC is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC). RAYNETCRM, LLC guarantees organization's liability in cases of onward transfers to third parties.

## We store your data in privacy and safety.