

Etho (“We”) are committed to protecting and respecting your privacy. This policy (together with our Terms of Service and licence agreement for the use of Etho) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By agreeing to use Etho you are accepting and consenting to the practices described in this policy.

Personal Data processed for the following purposes and using the following services:

1. Analytics

1.1. Analytics collected directly, Google Analytics, Wordpress Stats and HubSpot Analytics

1.1.1. Personal Data: Cookies; Usage Data

1.2. Google Analytics for Firebase

1.2.1. Personal Data: Application opens; Application updates; device information; geography/region; In-app purchases; launches; number of sessions; number of Users ; operating systems; session duration; Tracker; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); Usage Data

2. Backup saving and management

2.1. Backup on Google Drive

2.1.1. Personal Data: various types of Data as specified in the privacy policy of the service

3. Contacting the User

3.1. Contact form

3.1.1. Personal Data: first name; profession

3.2. Mailing list or newsletter

3.2.1. Personal Data: address; company name; Cookies; country; county; date of birth; email address; first name; gender; last name; phone number; profession; Usage Data; website; ZIP/Postal code

3.3. Phone contact

3.3.1. Personal Data: phone number

3.4. Integration of Freshsales with Freshchat and/or Freshdesk

3.4.1. Personal Data: company name; email address; first name; geography/region; last name; phone number; physical address; profession; social media accounts

4. Content performance and features testing (A/B testing)

4.1. Google Optimize and Google Optimize 360

4.1.1. Personal Data: Cookies; Usage Data

4.2. Firebase Remote Config

4.2.1. Personal Data: various types of Data as specified in the privacy policy of the service

5. Hosting and backend infrastructure

5.1. Microsoft Azure, Amazon Web Services (AWS) and Firebase Hosting

5.1.1. Personal Data: various types of Data as specified in the privacy policy of the service

5.2. Netlify

5.2.1. Personal Data: address; company name; Data communicated while using the service; email address; password; phone number; Usage Data; username; various types of Data as specified in the privacy policy of the service

5.3. CookieYes Consent Solution

5.3.1. Personal Data: Data communicated while using the service

5.4. Firebase Cloud Firestore, Firebase Cloud Functions, Firebase Cloud Storage and Firebase Realtime Database

- 5.4.1. Personal Data: Usage Data; various types of Data as specified in the privacy policy of the service
- 6. Infrastructure monitoring**
 - 6.1. Firebase Performance Monitoring**
 - 6.1.1. Personal Data: various types of Data as specified in the privacy policy of the service
- 7. Interaction with data collection platforms and other third parties**
 - 7.1.1. Mailchimp widget**
 - 7.1.1.1. Personal Data: email address; first name; last name; phone number; Usage Data
- 8. Interaction with live chat platforms**
 - 8.1. Freshchat Widget**
 - 8.1.1. Personal Data: Data communicated while using the service; email address; Tracker; Usage Data
- 9. Location-based interactions**
 - 9.1. Geolocation and Non-continuous geolocation**
 - 9.1.1. Personal Data: geographic position
- 10. Managing contacts and sending messages**
 - 10.1. Mailchimp**
 - 10.1.1. Personal Data: address; company name; Cookies; country; date of birth; email address; first name; gender; last name; phone number; Usage Data; username; various types of Data
 - 10.2. ZOHO Campaigns**
 - 10.2.1. Personal Data: address; city; company name; Cookies; country; date of birth; email address; first name; gender; language; last name; password; phone number; profession; profile picture; state; Usage Data; username
 - 10.3. HubSpot Email**
 - 10.3.1. Personal Data: email address; Usage Data
 - 10.4. Microsoft 365**
 - 10.5. Firebase Cloud Messaging and Firebase Notifications**
 - 10.5.1. Personal Data: various types of Data as specified in the privacy policy of the service
- 11. Managing data collection and online surveys**
 - 11.1. Typeform**
 - 11.1.1. Personal Data: address; company name; Cookies; country; Data communicated while using the service; date of birth; email address; first name; gender; geographic position; last name; number of employees; password; phone number; profession; Usage Data; username; various types of Data as specified in the privacy policy of the service
- 12. Managing support and contact requests**
 - 12.1. Zendesk**
 - 12.1.1. Personal Data: various types of Data as specified in the privacy policy of the service
 - 12.2. ZOHO CRM Email**
 - 12.2.1. Personal Data: address; company name; Cookies; country; date of birth; email address; first name; gender; Invoicing information; language; last name; password; phone number; profession; profile picture; state; Usage Data; username; various types of Data as specified in the privacy policy of the service
 - 12.3. Freshdesk**
 - 12.3.1. Personal Data: Data communicated while using the service; various types of Data as specified in the privacy policy of the service
- 1. Operations**
 - a. Clickup
- 2. Platform services and hosting**

- a. **Webflow**
 - i. Personal Data: various types of Data as specified in the privacy policy of the service
- 3. **Registration and authentication**
 - a. **Auth0**
 - i. Personal Data: Cookies; email address; first name; last name; password; picture; various types of Data as specified in the privacy policy of the service
 - b. **Firebase Authentication**
 - i. Personal Data: email address; first name; last name; password; phone number; profile picture; social media accounts ; username
- 4. **Registration and authentication provided directly by this Application**
 - a. **Direct registration**
 - i. Personal Data: academic background; address; billing address; budget; city; company name; Cookies; country; county; date of birth; email address; fax number; field of activity; first name; gender; house number; language; last name; number of employees; password; phone number; picture; prefix ; profession; profile picture; Social Security number (SSN); Usage Data; User ID; username; various types of Data; website; workplace; ZIP/Postal code
- 5. **Social features**
 - a. **Public profile**
 - i. Personal Data: address; city; company name; country; county; date of birth; email address; first name; gender; geographic position; last name; phone number; picture; profession; username
 - b. **Firebase Dynamic Links and Firebase Invites**
 - i. Personal Data: various types of Data as specified in the privacy policy of the service
- 6. **SPAM protection**
 - a. **Google reCAPTCHA**
 - i. Personal Data: Cookies; Usage Data
- 7. **Tag Management**
 - a. **Google Tag Manager**
 - i. Personal Data: Usage Data
- 8. **User database management**
 - a. **ZOHO CRM**
 - i. Personal Data: address; city; company name; Cookies; country; date of birth; email address; first name; gender; Invoicing information; language; last name; password; phone number; profession; profile picture; Usage Data; username; various types of Data as specified in the privacy policy of the service
 - b. **HubSpot CRM**
 - i. Personal Data: email address; phone number; various types of Data as specified in the privacy policy of the service
 - c. **HubSpot Lead Management and Freshsales**
 - 1. Personal Data: various types of Data as specified in the privacy policy of the service

Further information about the processing of Personal Data

13. Analysis and predictions based on the User's Data ("profiling")

13.1. The Owner may use the Personal and Usage Data collected through this Application to create or update User profiles. This type of Data processing allows the Owner to evaluate User choices, preferences and behaviour for the purposes outlined in the respective section of this document.

User profiles can also be created through the use of automated tools like algorithms, which can also be provided by third parties. To find out more about the profiling activities performed, Users can check the relevant sections of this document.

The User always has a right to object to this kind of profiling activity. To find out more about the User's rights and how to exercise them, the User is invited to consult the section of this document outlining the rights of the User.

14. Automated decision-making

14.1. Automated decision-making means that a decision which is likely to have legal effects or similarly significant effects on the User, is taken solely by technological means, without any human intervention. This Application may use the User's Personal Data to make decisions entirely or partially based on automated processes according to the purposes outlined in this document. This Application adopts automated decision-making processes as far as necessary to enter into or perform a contract between User and Owner, or on the basis of the User's explicit consent, where such consent is required by the law.

Automated decisions are made by technological means – mostly based on algorithms subject to predefined criteria – which may also be provided by third parties.

The rationale behind the automated decision making is:

- 14.1.1. to enable or otherwise improve the decision-making process;
- 14.1.2. to grant Users fair and unbiased treatment based on consistent and uniform criteria;
- 14.1.3. to reduce the potential harm derived from human error, personal bias and the like which may potentially lead to discrimination or imbalance in the treatment of individuals etc.;
- 14.1.4. to reduce the risk of User's failure to meet their obligation under a contract. To find out more about the purposes, the third-party services, if any, and any specific rationale for automated decisions used within this Application, Users can check the relevant sections in this document.

15. Consequences of automated decision-making processes for Users and rights of Users subjected to it

15.1. As a consequence, Users subject to such processing, are entitled to exercise specific rights aimed at preventing or otherwise limiting the potential effects of the automated decisions taken.

In particular, Users have the right to:

- 15.1.1. obtain an explanation about any decision taken as a result of automated decision-making and express their point of view regarding this decision;
- 15.1.2. challenge a decision by asking the Owner to reconsider it or take a new decision on a different basis;
- 15.1.3. request and obtain from the Owner human intervention on such processing.

- 15.1.3.1.1. To learn more about the User's rights and the means to exercise them, the User is invited to consult the section of this document relating to the rights of the User.

16. Pseudonymous use

- 16.1. When registering for this Application, Users have the option to indicate a nickname or pseudonym. In this case, Users' Personal Data shall not be published or made publicly available. Any activity performed by Users on this Application shall appear in connection with the indicated nickname or pseudonym. However, Users acknowledge and accept that their activity on this Application, including content, information or any other material possibly uploaded or shared on a voluntary and intentional basis may directly or indirectly reveal their identity.

17. Push notifications

- 17.1. This Application may send push notifications to the User to achieve the purposes outlined in this privacy policy.
- 17.2. Users may in most cases opt-out of receiving push notifications by visiting their device settings, such as the notification settings for mobile phones, and then change those settings for this Application, some or all of the apps on the particular device.
- Users must be aware that disabling push notifications may negatively affect the utility of this Application.

18. Push notifications based on the User's geographic location

- 18.1. This Application may use the User's geographic location to send push notifications for the purposes outlined in this privacy policy.
- 18.2. Users may in most cases opt-out of receiving push notifications by visiting their device settings, such as the notification settings for mobile phones, and then changing those settings for some or all of the apps on the particular device.
- 18.3. Users must be aware that disabling push notifications may negatively affect the utility of this Application.

Contact information

- **Owner and Data Controller**
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