

# Elcomplus Privacy Policy

Effective December 16, 2019. Last Revised December 16, 2019

We at Elcomplus would like to thank you for your interest in our products and services.

We want you to understand how and why Elcomplus collects, uses, and shares information about you when you use our website <https://smartptt.com> (the "Services") or when you otherwise interact with us or receive a communication from us. The Services are intended for use only by entities and organizations.

The Services cannot be provided for personal or domestic needs.

## What We Collect

### Information You Provide to Us

We collect information you provide to us directly when you use the Services. This includes:

*Contact information.* When a visitor submit a request by filling a Form on our website to ask information about Sales, Technical support or other General issues, Elcomplus may collect personal information about you, including name, e-mail, phone number, country, company and, in rare instances, other categories of personal information (if necessary).

*E-mail address information for Newsletter subscription.* We will ask for your e-mail if you want to subscribe for our newsletter. If you do not wish to receive marketing newsletters you can unsubscribe at any time in the bottom of received newsletter. After you opt out, we will not send further promotional emails, but we may continue to contact you to the extent necessary for the purposes of any services that you have requested.

### Information We Collect Automatically

When you access or use our Services, we may also automatically collect information about you. This includes:

*Log and usage data.* We may log information when you access and use the Services. This may include your IP address, browser type, operating system, referral URLs, device information (e.g., device IDs), pages visited, links clicked, the requested URL, hardware settings, and search terms.

*Information collected from cookies and similar technologies.* When you enter our site, our server may attach a small text file to your hard drive called a cookie. A "cookie" is a text file containing small amounts of information which is downloaded to your device when you visit a website. We use this information to improve your experience, understand user activity, personalize content and improve the quality of our Services. For example, we store and retrieve information about your preferred language and other settings.

For more information on how you can disable cookies, please see "Your Choices" below.

*Location information.* We may receive and process information about your location. For example, with your consent, we may collect information about the specific location of your mobile device (for example, by using GPS or Bluetooth). We may also receive location information from you when you choose to share such information on our Services, including by associating your content with a location, or we may derive your approximate location from other information about you, including your IP address.

## Information Collected from Other Sources

We do not receive information about you from other sources.

## How We Use Information About You

We use information about you to:

- Provide customer service and technical support;
- Provide, maintain, and improve the Services;
- Send you technical notices, updates, security alerts, invoices and other support and administrative messages;
- Communicate with you about products, services, offers, promotions, and events, and provide other news and information we think will be of interest to you (for information about how to opt out of these communications, see “Your Choices” below);
- Monitor and analyze trends, usage, and activities in connection with our Services.

## How Information About You Is Shared

Otherwise, we do not share, sell, or give away your personal information to third parties unless one of the following circumstances applies:

- *With your consent.* We may share information about you with your consent or at your direction.
- *With our partners.* We may share information with vendors, consultants, and other service providers (but not with advertisers and ad partners) who need access to such information to carry out work for us. The partner’s use of personal data will be subject to appropriate confidentiality and security measures.
- *With our affiliates.* We may share information between and among Elcomplus, and any of our parents, affiliates, subsidiaries, and other companies under common control and ownership
- *To comply with the law.* We may share information in response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law, regulation, legal process or governmental request, including, but not limited to, meeting national security or law enforcement requirements. To the extent the law allows it, we will attempt to provide you with prior notice before disclosing your information in response to such a request. Our Transparency Report has additional information about how we respond to government requests.
- *In an emergency.* We may share information if we believe it's necessary to prevent imminent and serious bodily harm to a person.
- *To enforce our policies and rights.* We may share information if we believe your actions are inconsistent with our user agreements, rules, or other Reddit policies, or to protect the rights, property, and safety of ourselves and others.

## Analytics Partners

We may partner with third-party analytics providers to content targeted to your interests and to better understand your use of the Services. These third parties may collect information sent by your computer, browser, or mobile device in response to a request for content, such as unique identifiers, your IP address, or other information about your computer or device. For example:

## Analytics Partners

We use analytics partners (such as Google Analytics) to help analyze usage and traffic for our Services. As an example, we may use analytics partners to analyze and measure, in the aggregate, the number of unique visitors to our Services.

## Your Choices

As an Elcomplus user, you have choices about how to protect and limit the collection, use, and disclosure of information about you.

### Controlling the Use of Cookies

Most web browsers are set to accept cookies by default. We may use next types of cookies:

Cookie file name	Domain	Proposes
1P_JAR ANID APISID HSID NID SAPISID SID SIDCC SSID	google.com	Collection of general statistics about visitors' usage. We use it for traffic analytics and the site improvement. It includes unique visitors count, user location and viewed pages.
L Session_id _ym_d _ym_isad _ym_uid cycada i mda sessionid2 yandex_login yandexuid	yandex.ru	
_fbp _ym_d _ym_uid _ym_wasSynced cto_lwid	yastatic.net	
yabs-sid	mc.yandex.ru	
_ga _ym_d _ym_isad _ym_uid wp-settings-154 wp-settings-time-154	smartptt.com	Saving theme settings; exclusion of user double count in visiting reports.

If you prefer, you can usually choose to set your browser to remove or reject first- and third-party cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our Services.

## **Controlling Analytics**

Some analytics providers we partner with may provide specific opt-out mechanisms and we may provide, as needed and as available, additional tools and third-party services that allow you to better understand cookies and how you can opt-out. For example, you may manage the use and collection of certain information by Google Analytics here.

## **Do Not Track**

Most modern web browsers give you the option to send a Do Not Track signal to the websites you visit, indicating that you do not wish to be tracked. However, there is no accepted standard for how a website should respond to this signal, and we do not take any action in response to this signal. Instead, in addition to publicly available third-party tools, we offer you the choices described in this policy to manage the collection and use of information about you.

## **Controlling Promotional Communications**

Elcomplus or its business partners may, from time to time, send you email or direct mail regarding our products and services. If you do not want to receive such information, simply tell us when you give us your personal information, or follow the directions contained on the mailing to remove your name from our mailing list(s).

## **Controlling Location Information**

If you initially consent to our collection of location information, you can subsequently stop the collection of this information at any time by changing the preferences on your mobile device.

## **Other Information**

### **Information Security**

We take measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration, and destruction. For example, we use HTTPS while information is being transmitted. We also enforce technical and administrative access controls to limit which of our employees have access to non-public personal information.

### **Data Retention**

We store the information we collect for as long as it is necessary for the purpose(s) for which we originally collected it. We may retain certain information for legitimate business purposes or as required by law.

### **Additional Information for EEA Users**

Users in the European Economic Area have the right to request access to, rectification of, or erasure of their personal data; to data portability in certain circumstances; to request restriction of processing; to object to processing; and to withdraw consent for processing where they have previously provided consent. These rights can be exercised using the information provided under “Your Choices” above or using the contact information provided at the end of this document. EEA users also have the right to lodge a complaint with their local supervisory authority.

As required by applicable law, we collect and process information about individuals in the EEA only where we have legal bases for doing so. Our legal bases depend on the Services you use and how you use them. We process your information on the following legal bases:

- You have consented for us to do so for a specific purpose;

- We need to process the information to provide you the Services, including to operate the Services, provide customer support and personalized features and to protect the safety and security of the Services;
- It satisfies a legitimate interest (which is not overridden by your data protection interests), such as preventing fraud, ensuring network and information security, enforcing our rules and policies, protecting our legal rights and interests, research and development, and marketing and promoting the Services;
- We need to process your information to comply with our legal obligations.

### **Children**

Web sites operated by or on behalf of Elcomplus are intended for use by persons age 13 and over or as required by local law. Elcomplus does not seek to collect information about children under the age of 13. No information should be submitted to or posted on Elcomplus web sites by users under 13 years of age. If a child under the age of 13 submits personal information to Elcomplus web sites, we delete the information as soon as we discover it was provided by a child under 13 years of age and do not use it for any purpose. Elcomplus encourages parents to take an active role in their children's use of the Internet, and to inform them of the potential dangers of providing information about themselves over the Internet.

### **Changes to This Policy**

We may change this Privacy Policy from time to time. If we do, we will let you know by revising the date at the top of the policy. We encourage you to review the Privacy Policy whenever you access or use our Services or otherwise interact with us to stay informed about our information practices and the ways you can help protect your privacy. By continuing to use our Services after Privacy Policy changes go into effect, you agree to be bound by the revised policy.

### **Contact Us**

If you have any questions about this Privacy Policy, please contact us at [info@smartptt.com](mailto:info@smartptt.com) or via your manager.

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