

# Doosty Privacy Policy

**Last updated on: Jan the 1<sup>th</sup> 2022**

Doosty is concerned with the privacy of the Doosty platform (the **"Platform"**) users, and uses its best efforts to protect it. In particular, Doosty undertakes to ensure a level of protection of personal data that is at least in accordance with the General Data Protection Regulation (**"GDPR"**), and California Consumer Privacy Act (**"CCPA"**).

Doosty collects and processes personal data relating to the users. "users" designate the members who have registered with the Platform, and whose registration was approved by Doosty. This privacy policy (the **"Privacy Policy"**) describes how the personal data relating to the users will be collected and processed.

The personal data shall be processed by Doosty Inc, subject to California law, currently at 1188 Mission St Apt 2422, San Francisco, CA, USA (hereinafter **"Doosty"** or **"We"** or **"Us"** ).

Doosty also collects data relating to the users, and more generally to the Platform users, by means of cookies, as described in more detail in Doosty's cookie policy.

## **1 WHAT INFORMATION DOES DOOSTY COLLECT?**

We collect personal data directly from each user when they register. In particular we collect:

- Registration Data:
  - E-mail address
  - Password (encrypted in a non-reversible manner).
  - Username
- We collect the following User Data:
  - First Name
  - Last Name
  - Phone Number
  - Gender
  - Personal Description
  - Language
  - Country
  - Currency
  - Social Media Info
  - Setting Details
- We collect the following Business (Vendor, Brand, Retailer) Data:
  - Business Name
  - Business Website
  - Business Email
  - Business Tax Identification Number
  - Corporation Type
  - Languages your business can speak
  - Category
  - Social Media Info

- Currencies you support
- Cut-off time
- Minimum Purchase
- Business Address (City, Zip code, State, Country, Street Address, Street Address)
- Phone Number
- Annual Sales
- Years you have been in Business
- Number of clients or resellers (if vendor or brand)
- Lead Time (if vendor or brand)
- Shipping Capability (if vendor or brand)
- ID or Passport
- Payment Information
- Invoice Related Data
- We collect other usage data:
  - Orders
  - Clicks on products
  - Impressions of products
  - Search data
  - User browsing data
- Analytics:
  - We may use analytics service providers, including Google Analytics, to collect information regarding visitors to our Services, such as their behavior on our Services or information about their demographic. For more information about Google Analytics, see <https://www.google.com/policies/privacy/partners/>. To opt out of Google Analytics, visit <https://tools.google.com/dlpage/gaoptout>.
- Do-Not-Track
  - Your browser may offer you a “Do Not Track” option, which allows you to signal to operators of websites and web applications and services (including behavioral advertising services) that you do not wish such operators to track certain of your online activities over time and across different websites. At this time, we do not respond to nor honor Do-Not-Track signals from web browsers.
- Information Collected from Third Parties
  - We may receive information about you from other sources, including to supplement the information we have collected about you. In some circumstances, we may receive payment performance information to evaluate your eligibility for extended payment terms.
  - We may collect information about you through a referral program. If you have been referred to Doosty but wish to opt out of emails from us, please contact us as explained below.
  - If you access our Services through a third party or social networking site, we may collect information about you from that third-party application if that information has been made public and you gave us the permissions.

The data collected are necessary, if such data are not provided, Doosty will not be in a position to make all of the Platform functionalities available.

## **2 PURPOSES OF THE COLLECTION OF PERSONAL DATA BY DOOSTY, AND DATA RETENTION PERIODS**

We collect the personal data relating to users, which are listed in this document, in order to provide the best service possible to our users. The below table gives an overview of how the personal data is processed and used.

- We collect information for business purposes:
  - Contacting you, and communicate with you
  - Allow you to set up a user account and profile
  - Fulfill your requests for products and services
  - (if payment related services offered in your case) Determine if you are eligible for extended payment terms
  - (if payment offered in your case) Process orders, payments

- We collect information for legitimate business interests:
  - Understand how you use the service
  - Personalize your experience
  - Engage in marketing or sales outreach
  - Verify your identity
  - Detect fraud, or security incidents
  - Debug errors
  - Ensure Quality Control
- We retain your information for the period for which you remain a registered user, with the following exception:
  - (if payment offered in your case) Tax and accounting data, bank account data, we retain this information for the duration prescribed by law for the retention of tax and accounting documents

We make use of automatic collection technologies such as cookies, pixel tags, and local storage objects (together “Cookies”) for the following purposes:

- Strictly Necessary: Technologies that allow you to access our Services and use our features. We might use this to identify irregular site behavior and prevent fraudulent activity or improve security
- Personalization of your experience
- Recommendation of content
- Measurement, to understand how we can improve your experience.

Doosty will collect and use personal information based on your consent. You can revoke your consent at any time by contacting us at [info@doosty.com](mailto:info@doosty.com). Note that you might not be able to use any service or feature that requires collection or use of that personal information.

### **3 DISCLOSURE OF YOUR PERSONAL DATA**

The personal data collected and processed by Doosty may be disclosed to the following recipients or categories of recipients:

- (if shipping involved) to the carriers, who will act under the responsibility of the user shipping the order;
- to the providers of payment and financial services;
- to authorities pursuant to a law and/or a court ruling;

### **4 DATA RETENTION PERIOD**

Doosty shall store the personal data of the users only for the duration that is strictly necessary for the purposes listed in this document. The data of the users shall then be archived, with restricted access, for an additional duration so that Doosty can comply with its legal and/or regulatory obligations in relating to the archiving and retention of data. On the expiry of this additional duration, the data of the users shall be permanently deleted from Doosty’s databases.

### **5 MINIMUM AGE**

We do not knowingly collect nor solicit personal information from anyone under the age of 18. If you are under 18, please do not attempt to register for the Services or send any personal information about yourself to us. If we learn that we have collected personal information from someone under age 18, we will delete that information as quickly as possible. If you believe that someone under 18 may have provided us with personal information, please contact us as described below.

### **6 INTERNATIONAL DATA TRANSFERS**

Information we collect about you will be stored in the following locations: EU, Canada, United Kingdom, and the United States. We will protect that information as described in this Policy.

## **7 THE RIGHT OF THE USERS**

You have a right of access, a right to rectification, a right to erasure, and a right to the portability of their personal data, as well as a right to object to the processing of their personal data, the right to withdraw their consent and a right to restriction of processing, in the conditions set out by applicable regulations.

The users may at any time object to the processing of their data for direct marketing purposes or in accordance with applicable regulations.

The users may send their request to Doosty:

- By email, to [info@doosty.com](mailto:info@doosty.com)
- By regular mail to 1188 Mission st, apt 2422, 94103, CA, USA

If a user considers that his/her rights were infringed, this user has the right to lodge a complaint with the data protection authority or any other competent authority.

## **8 CHANGES TO THE PRIVACY POLICY**

Doosty reserves the right to amend and/or update this Privacy Policy, in which case the user will be duly informed of such amendment or updating. The revised Privacy Policy shall be published on the Platform with an indication of the date it was last updated on.