

Pushvault Privacy Policy

Push Notifications Services powered by Spiroox

Revision 13-12-2018

Pushvault is a trademark of Spiroox Media SL, a Spanish company located at Paseo de la Castellana 143 3C 28046 Madrid (in therefore **"Pushvault"**, "we", "us", and "our").

This privacy policy is intended to specify the use and responsibilities of services provided by Spiroox through Pushvault, and how to manage, revoke or decline any of the rights you can have as user.

We have tried to make this policy clear to be sure you understand all the concepts and responsibilities over your user database and how is collected.

We've also provided a section about the choices that you have with respect to "interest based advertising," and we encourage you to read that section and exercise your "opt out" rights if you're inclined to do that. (But because interest based advertising leads to more relevant (and thus, less annoying) advertising, we hope you won't do that.)

Pushvault provides their API and Plugins for websites, and data and analytics services to other data partners and advertisers. These web API permit app developers and websites to send, manage, optimize and customize push notifications to their users. All of these services (further described in this privacy policy) are referred to collectively as our **"Services,"** and all of these developers, website operators, partners and advertisers are referred to collectively as our **"Clients."**

This privacy policy (the **"Privacy Policy"**) explains how we may collect, use, store, and disclose information about the end users (**"End Users"**) of third-party mobile applications and websites that use our Services. We also collect information on our corporate website(s), including any website on which this Privacy Policy is posted.

What we offer? – Uses and Responsibilities

Pushvault makes available to its customers several tools, technologies and APIs free of charge, allowing them to obtain through their own website or online services, activate in the browsers of their end users the service of web notifications, allowing them hereafter, carrying out communications of an informative, operational and / or commercial nature henceforth.

In return, Pushvault reserves the right to use this same channel, in order to make a communication of its own or a third party's commercial type, or to apply a fee on sending notifications in the future or in case of a massive usage of the application.

Pushvault, in any case, will not be responsible for the pernicious use that can be made of this service by third parties, limited to safeguarding the customer database, sending the notifications and making all possible information available, regarding these deliveries, for our clients through the platforms' statistics and / or APIs.

In order to offer a free of charges' service, for as many users as possible, we only request a responsible use of the application, not based on a certain number of deliveries, but also on a moderate use in relation to the number of deliveries and collection's techniques. The service may be cancelled, unilaterally and without any whatsoever right of compensation, to safeguard the

proper functioning of the other customers, if Pushvault determines that this service is repeatedly abused or if the security of the service is violated in any way.

What information we collect?

We collect the following information from visitors to our websites (the “Pushvault Website Information”, including the website on which this Privacy Policy appears (“Pushvault Website(s)”):

Volunteered: You may share information with us on the Pushvault Websites when you request information from us, fill out a form on our website, or interact with us in other ways. This information may include personal information, such as your name, email address, and other contact information.

Passively Collected (e.g., Cookies and Unique IDs): We use automated mechanisms, such as cookies, pixels, and other locally stored objects (such as “IndexedDB”) that we associate with unique identifiers in order to keep track of visitor interactions with the Pushvault Websites. (You can learn more about these technologies below in the Section titled “Cookies, Pixel Tags and SDKs”). We may use third party-services such as Google Analytics, in which case those third parties gather information such as your IP address, browser type, the webpage from which you came to our website, and the times of your access to the Pushvault Website. In addition, as you browse our website, advertising cookies may be placed on your computer so that we can understand what you are interested in. Our display advertising partners may then help us retarget ads to you on other sites based on your interactions with the Pushvault Website. To “opt out” of having your information used to tailor ads to you in this way by third party ad platforms that we may work with or provide data to, please review the Section below titled “Consumer Control and Opt Out Options” to learn how to opt-out of these services and instead receive generic, non-tailored ads

How We Use the Pushvault Website Information

In addition to the uses described above, we use the Pushvault Website Information (alone or in combination) to provide, market, and operate the Pushvault Websites and Services. Among other things, by collecting the Pushvault Website Information, we are able to

- Maintain and offer access to the Pushvault Websites and Services and optimize how they’re offered to our Clients.
- Send information about our products and services, including marketing communications.
- Respond to your questions, concerns, or customer service inquiries.
- Customize the content and advertising you see on the Pushvault Websites, across the Internet, and elsewhere.

How We Share the Pushvault Website Information

We may share the Pushvault Website Information as follows:

- As part of a business sale, merger, consolidation, investment, change in control, transfer of substantial assets, reorganization or liquidation, or in connection with steps taken in anticipation of such an event (e.g., due diligence).
- With our corporate affiliates.
- With third parties that help us to provide the Pushvault Websites or Services, such as entities that help us make the Pushvault Websites or Services available and functional (such as hosting services); entities that help us make available or transmit any information we hold (such as helping us send emails, process payments, and manage customer information); and entities that help us (including our contractors, agents, and affiliates)

provide technical, customer, billing, administrative, event planning, marketing or operational services to us or our Clients.

- When required by law or in response to lawful process, such as a subpoena, or to cooperate in good faith with a request from a government or law enforcement agency or official.

If we believe sharing the information may prevent physical, financial or other harm, injury or loss; or we believe is necessary to protect our, or any other person's or entity's, interests; or in connection with an investigation of suspected or actual unlawful activity.

We also may disclose your information under circumstances not mentioned here with your prior consent.

Que uso hacemos de las bases de datos de nuestros clientes

What use do we make of the databases of our clients

Pushvault does not resell the databases of our clients or share any information of such databases with any third parties. Our customers can only access to their own inventory whenever sending notifications are the purpose. However, a client may assign the exploitation of its user database to Pushvault by means of the appropriate configuration of its administration dashboard, allowing Pushvault to notify its database with its own or third-party campaigns in exchange for financial compensation.

Pushvault reserves the right to make periodic deliveries to some customer users databases for their own use, as compensation for the free service of the platform and in order to keep the service as free of any charges.

In order to reach a specific collaboration or exploitation agreement, the rules that will govern the contractual relationship will be those which be marked in the new signed IO, prevailing over this document.

Data Property

Pushvault will only be considered owner of the data collected regarding this website, or the different platforms that it makes available to its own users.

In the case of the respective users' databases, the owner and final responsible will be the client, who will have the responsibility to inform its end users about the T&Cs of service's use, not being able to demand any responsibilities in any cases to Pushvault, which only acts as a technological partner providing technology.

Where is the information stored?

The Website and our Services are provided, supported and hosted in the European Union, and our operation of them is governed by European laws. If you are using the Site from outside the Europe, be aware that your Information may be transferred to, stored and processed in the European Union. The data protection and other laws of the European Union might not be as comprehensive as those in your country. By using the Site you consent to your information being transferred to our facilities and to the facilities of those third parties with whom we share it as described in this Policy.

Do we use Cookies?

To be able to offer a proper service and an efficient control when managing push notification service messages, we need to establish some cookies' control in your browser or in the browser of the end users.

We use Google cookies to track the results of our advertising actions, as well as page analytics.

We use our own cookies to access and maintain Pushvault platform's login.

We set cookies with the name of your own domain when you use our plugins, in order to control the notification messages cadence to end users.

We keep a unique token in each browser in the internal storage servers, to control whether the end user allows or not, to be notified by our system.

Third Parties

Occasionally, at our discretion, we may include or offer third party products or services on our website. These third party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

Online Privacy Policy Only

This online privacy policy applies only to information collected through our website or any SDK, plugin or code offered to our partners, and not to information collected offline.

Titularity

In compliance with Article 10 of Law 34/2002, of July 11, Services of the Information Society and Electronic Commerce, it is stated:

Who is responsible for the processing of your data?

Name: **SPIROOX MEDIA S.L.**

CIF: ESB85503662

Address: PASEO DE LA CASTELLANA 143 3C 28046 MADRID SPAIN

Email: contact@pushvault.com

Website: <https://pushvault.com>

You can contact us in any of the above ways.