

# Privacy Policy

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This is the privacy policy ("**Privacy Policy**") that governs how we, Ltu Media Ltd. ("**Boomtrack**", "**we**", "**our**" or "**us**"), use Personal Data (defined below) that we collect, receive and store about individuals in connection with the use of: (i) the website at [www.boom-track.com](http://www.boom-track.com), and any other website that we operate (collectively, together with their sub-domains, content and services, the "**Sites**"); and (ii) our lead management tool, available via the Sites and our web and mobile applications (the "**Service**").

We ourselves do not host any of the Sites and Service. All hosting is done by third-party service providers that we engage. This means that data you provide us or that we collect from you (including any Personal Data, as defined below) – as further described in this Privacy Policy – is hosted with such third-party service providers on servers that they own or control. Regardless of where such third-party service providers are located, their servers may be located anywhere in the world. Your data may even be replicated across multiple servers located in multiple countries.

## 1. Introduction.

**Section Summary:** This Privacy Policy is part of our Terms of Service and explains our practices and the choices you can make about the way your Personal Data is collected and used in connection with the Sites and Service. By using the Sites and Service, you agree to the terms of this Privacy Policy and to our collection, processing and sharing of Personal Data for the purposes set forth herein. If you do not agree to this Privacy Policy, please do not access or otherwise use the Sites and Service.

- 1.1. The privacy of our users is important to us. This Privacy Policy explains our online data practices and the choices you can make about the way your Personal Data is collected and used in connection with the Sites and the Service. "**Personal Data**" means any information or data that may be used, either alone or in combination with other data, to personally identify an individual, including a person's name, personal profile, e-mail address, physical address or other contact information.
- 1.2. This Privacy Policy forms part of our Terms of Service which is available at [www.boom-track.com](http://www.boom-track.com) ("**Terms**"). Any capitalized but undefined term in this Privacy Policy shall have the meaning given to it in the Terms.
- 1.3. We strongly urge you to read this Privacy Policy and make sure that you fully understand and agree with it. If you do not agree to this Privacy Policy, please discontinue and avoid using the Sites or Service.
- 1.4. You are not legally obligated to provide us Personal Data and may chose it at your own free will. If you do not agree to provide us with such data or have it processed by us or any of our service providers, please simply do not enter our Sites or use our Service. We reserve the right to change this Privacy Policy at any time at our discretion. Such change will be effective ten (10) days following the e-mail you will get from us' let you know that we changed our privacy policy, and your continued use of the Service thereafter means that you accept those changes. Any change in our privacy policy will be obligate under the GDPR.

## 2. What Personal Data We Collect and How We Collect It.

### Section Summary:

We receive, collect and use the data listed below as it is necessary for the adequate performance of the contract between you and us, to provide you the Service, to support our legitimate interests in better understanding, securing and improving our Service and overall performance, and to allow us to comply with our legal and contractual obligations.

We receive and collect Personal Data from you when you provide us your name and e-mail address during signup, when you contact us or when you make a purchase and provide your billing information. When you submit Customer Data or your User Profile, we will process this information on behalf of your Organization, in accordance with the Data Processing Agreement.

We receive and collect Personal Data from your browser or mobile device about your use of the Sites and Service. We use log files and analytics tools to analyse trends, administer the Sites and Service, track users' movement around the Sites and Service, and gather statistical data. We use "cookies", technical identifiers and other tracking technologies in order to provide and enhance our Sites and Service. We also collect limited data regarding your system and device, such as your mobile device id or browser preferences.

We receive and collect Personal Data from Third Parties, such as service providers, ad networks and marketing agencies, or from Services Integrations when you use third party integrations.

We do not require you to provide us your Personal Data in order to access general information available on the Sites, although such activities may still be logged. However, we do receive and collect Personal Data from you in the ways listed below. We receive and collect this data as it is necessary for the adequate facilitation and performance of the contract between you and us, to provide you the Service, to secure our legitimate interests in analysing the performance of our campaigns and Service, and to allow us to comply with our legal obligations.

- 2.1. User Account. In order to use the Service, or certain areas on the Sites, you are required to create an account ("User Account") and provide your name and e-mail address. We may send you a text message to your mobile phone or an e-mail to the e-mail address you provide, to confirm your registration.
- 2.2. Profile. Once your User Account is created, you can build your profile ("Profile"). Your Profile will be made available to all the Authorized Users who share the same Board(s) as you. Your Profile will include your name, e-mail and any other information you choose to provide such as your profile photo, phone number, location, time-zone, job title, skills and other information you submit through the Service. Your Profile information will be processed by us on behalf of your Organization, in accordance with our Privacy policy.
- 2.3. 'Contact Us' Information. If you send us a "Contact Us" request, whether by submitting an online form on our Sites or by sending an e-mail to an e-mail address that we display, you will be asked to provide us with your contact information (name, e-mail address and phone number).
- 2.4. Usage Data. We collect data about how and the way you are accessing and using the Sites and Service, which include administrative and support communications with us and information about the Boards, channels, people, features, content, and links you interact with, and what third-party integrations you use (if any). Such information may include Personal Data.
- 2.5. Data We Receive from Third Parties. We may receive certain data, including Personal Data, from third parties, such as service providers, ad networks and marketing agencies, which all relate to your preferences and your use of the Sites and Service.
- 2.6. Purchases. The Service includes the option to purchase certain services from us. If you choose to make a purchase, we will require certain information from you as necessary to complete the transaction. Such information could include a credit card number and related account and billing information, invoice related information, and other data required to process the order. We will also update such data should you grant us permission to bill you or your credit card for recurring charges, such as monthly or other types of periodic payments. We use third-party service providers to process transactions, in which case

you will be bound by the terms of service and privacy policy of such third parties – so please make sure you read and accept them.

- 2.7. Log Files. We make use of log files. The data inside the log files includes internet protocol (IP) addresses, type of browser, your device's type, Internet Service Provider (ISP), date/time stamp, referring/exit pages, clicked pages and any other information your browser send to us. We use such data to analyse trends, administer the Sites and Service, track user movement in the Sites and Service and gather statistical data
- 2.8. Cookies and Other Tracking Technologies. Our Sites and Service utilize "cookies", anonymous identifiers and other tracking technologies in order for us to provide our Service, analyse our performance and personalize your experience. A "cookie" is a small text file that is used, for example, to collect data about activity on our Sites. Certain cookies and other technologies serve to recall Personal Data, such as an IP address, previously indicated by a user. Please note that we do not change our practices in response to a "Do Not Track" signal in the HTTP header from a browser or mobile application, however, most browsers allow you to control cookies, including whether or not to accept them and how to remove them. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser.
- 2.9. Mobile Device Data. We collect limited data from your mobile device in order to provide the Service and analyse our performance. Such data includes your mobile device type, mobile device id, and date and time stamps of Service use. In addition, we deploy tracking technologies within the Service to help us gather aggregate, non-personal statistics.
- 2.10. Services Integrations. If, when using the Service, you integrate with a third-party service, we will connect that third-party service to ours. The third-party provider of the integration shares certain relevant data about your account with boomtrack.com. However, we do not receive or store your passwords for any of these third-party services.
- 2.11. **Customer Data**. In the course of using the Service, you may submit Customer Data. Our use of such Customer Data is in accordance with the Terms of service.

### 3. The Way We Use Personal Data and Who We Share It With.

#### Section Summary:

We use your Personal Data to provide and improve our Service, to contact you in connection with the Service, to identify and authenticate your access to the Service, to send you updates and news regarding the Service and our products, to respond to a "Contact Us" request, to send you service and administrative e-mails and messages, and to inform you about changes or important Service related notices.

We transfer your Personal Data to other countries and share it with our subsidiaries or affiliated companies for the purpose of storing or processing such data on our behalf, with third-party service providers who complement and assist us with our business operations and to facilitate our Service (like billing, support or other services), with our business partners and affiliates so they can contact you in order to offer or promote our Service, and with whoever you specifically ask us to share it with.

We will disclose your Personal Data to comply with any law, regulation, legal process or governmental request requiring us to do so, to enforce our Terms, to detect or address fraud or security issues or to protect against harm to the rights, property or safety of Boomtrack.com, our users, yourself or any other members of the public.

We use and share with third If you submit or we collect Personal Data through the Sites and Service, then we will use such Personal Data in the following ways, via any communication channel available to us, including e-mail, SMS, etc.:

- 3.1. We will use your Personal Data to provide and improve our Service, to identify and authenticate your access to certain non-public parts of the Sites and Service, and to allow other Authorized Users on the same Board to identify you and your activity on the Board.
- 3.2. We will use your designated e-mail address to: (i) send you updates and news regarding the Service and our

products; or (ii) to recover your password in case you forgot her

- 3.3. We will send you service and administrative e-mails and messages, including to inform you about changes in our Sites or Service, to provide you with important Service related notices, such as security notices, and to respond to a "Contact Us" or administrative request (for example, to change your password). These e-mails and messages are considered an integral part of the Service and in case you may want to opt-out of them' you will have to stop using our service.
- 3.4. If you choose to send others an e-mail or message inviting them to use the Service, we will use the contact information you provide us to automatically send such invitation e-mail or message. Your name and e-mail address may be included in the invitation e-mail or message.
- 3.5. We will transfer your Personal Data to our local or foreign subsidiaries and affiliated companies for the purpose of storing and processing such data on our behalf. Such data may be transferred to other countries. These parties are committed to process such data in accordance with this Privacy Policy.
- 3.6. We will share or provide access to your Personal Data to our selected third-party service providers and partners, some of which are situated outside of the EEA, but only to assist us with our business operations and to provide our Service to you and other users. Such service providers include hosting and server collocation services, communications and content delivery networks (CDNs), data and cyber security services, DDoS prevention services, billing and payment processing services, domain name registrars, fraud detection and prevention services, web analytics, e-mail distribution and monitoring services, session recording and remote access services, performance measurement data optimization and marketing services, content providers, e-mail, voicemails, support and customer relation management systems (CRM), and our legal and financial advisors. This means that your data may be transferred to other countries. We will typically engage only with such third-party service providers and partners that post a privacy policy governing their processing of Personal Data.
- 3.7. We may disclose and transfer your Personal Data or any information you submit via the Sites and Service per your specific instructions or requests.
- 3.8. We may share your contact details with our business partners and affiliates, so they can contact you in order to offer or promote our Service.
- 3.9. We may disclose your Personal Data if we have a good faith belief that disclosure of such data is reasonably necessary to: (i) comply with any applicable law, regulation, legal process or governmental request; (ii) enforce our Terms, including investigations of potential violations thereof; (iii) detect, prevent, or otherwise address fraud or security issues; or (iv) protect against harm to the rights, property or safety of Boomtrack.com, our users, yourself or the public.
- 3.10. If you contact us for help in resolving an issue specific to a team of which you are a member (and which is managed by your Organization), then given our relationship with your Organization we may share your concern with them.
- 3.11. We use Anonymous Data (as defined below) and disclose it to third-party service providers in order to improve our Sites and Service, to perform random tests for additional features and to enhance your user experience. We also disclose Anonymous Data (with or without compensation) to third parties, including partners. "**Anonymous Data**" means data which does not enable the identification of an individual user, such as aggregated data about the use of our Sites and Service. This Privacy Policy is not intended to place any limits on what we do with data that is aggregated and de-identified, so it is no longer associated with an identifiable person.

- 3.12 In the event that we are acquired by or merged with a third-party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer or assign Personal Data and any other information you provided us in connection with such events. We will let you know about that and you will have the right to refuse

#### 4. How we protect your Data

We follow generally accepted industry standards to protect Personal Data, however no method of transmission over the Internet or method of electronic storage is 100% secure.

- 4.1. Security. The security of your Personal Data is important to us. We follow generally accepted industry standards to protect the Personal Data submitted to us. However, no method of transmission over the Internet or method of electronic storage is 100% secure. Therefore, we cannot guarantee its absolute security or confidentiality. If you have any questions about security on the Sites or Service, you can contact us at [support@boom-track.com](mailto:support@boom-track.com). You can also learn more about boom-track.com's security practices at [www.boom-track.com](http://www.boom-track.com).

#### 5. Your Rights as a "Data Subject"

**Section Summary:** You can exercise your rights at any time by contacting our support team at [support@boom-track.com](mailto:support@boom-track.com) or our Data Protection Officer at [dpo@boom-track.com](mailto:dpo@boom-track.com). We also offer you the following mechanism to exercise your rights.

- 5.1. Data Subject Rights To the extent that you wish to exercise your rights under applicable law (e.g. the EU GDPR) to request access to and rectification or erasure of your Personal Data held with boom-track.com, or to restrict or object to such Personal Data's processing, or to port such Personal Data - please contact your Organization's Admin who will typically have control of your Personal Data. You can also contact our support team at [support@boom-track.com](mailto:support@boom-track.com) or our DPO at [dpo@boom-track.com](mailto:dpo@boom-track.com).
- 5.2. Opting Out. You may choose not to receive future promotional or advertising, or certain Service-related e-mails from us by clicking the "unsubscribe" or "change email preferences" link at the bottom of each e-mail that we send and changing such preferences in your account. Also, you will ask when you will resign to our service if you allow us to send you future promotional or advertising. Please note that even if you opt out of receiving the foregoing e-mails, we will still send you a response to any "Contact Us" request as well as administrative e-mails (for example, in connection with a password reset request) that are necessary to facilitate your use of the Sites and Service, as explained in Section 3.3 above.
- 5.3. Choice. At all times, you may choose whether or not to provide or disclose Personal Data. If you choose not to provide Personal Data which is mandatory in order to fully use our Service, you may still visit parts of the Sites and Service which are available to the general public, but you will not be able to access certain options, programs, and services that require authentication or involve our interaction with you.

#### 6. Additional notices

- 6.1. Links to and Interaction with Third Party Products. The Sites and Service may enable you to interact with or contain links to your user accounts with other third-party websites, mobile software applications and services that are not owned or controlled by us (each a "Third Party Service"). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services may collect Personal Data from you. Accordingly, we encourage you to read the terms and conditions and privacy policy of each Third Party Service that you choose to use or interact with.
- 6.2. Storage and deletion. boom-track.com retains data for as long as we provide you the Service, and thereafter in accordance with our Data Retention Policy. If you want us to delete your Personal Data, or if you want to learn more about where and how long your Personal Data is stored, and for more information on your rights of erasure and portability, please contact our DPO Data Protection in Israel. Ltu Media Ltd. is an Israeli entity. The State of Israel was recognized by the European Commission as Privacy Shield. Boom-track.com's US entity (Ltu Media Ltd.) is self-certified and adheres to the principles of the Privacy Shield Framework.

6.3. Children's Privacy. **The Sites and Service are not structured to attract children under the age of 16**, and we do not intend to collect Personal Data from anyone we know to be under 16. If we learn that we have collected Personal Data from anyone under 16 years, we will delete that information as quickly as possible. If you believe that we might have any such information, please contact us at [support@boom-track.com](mailto:support@boom-track.com).

DPO. Boom-track.com has appointed Privacy veteran as our Data Protection Officer, for monitoring and advising on boom-track.com's ongoing Privacy compliance and serving as a point of contact on Privacy matters for data subjects and supervisory authorities. If you have any comments or questions regarding our Privacy Policy, if you have any concerns regarding your Privacy, or if you wish to make a complaint about how your personal data is being processed by boom-track.com, you can contact [support@boom-track.com](mailto:support@boom-track.com) or our DPO at [dpo@boom-track.com](mailto:dpo@boom-track.com).

## **7. Questions, concerns or complaints**

If you have any comments or questions regarding our Privacy Policy or if you have any concerns regarding your Privacy, you can contact boom-track.com's support at [support@boom-track.com](mailto:support@boom-track.com) or our Data Protection Officer at [dpo@boom-track.com](mailto:dpo@boom-track.com). If you are a GDPR-protected individual, you also have the right to lodge a complaint with an EU supervisory authority.

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