

# iP.1 Privacy Policy

Valid from 2018-05-25

## 1 Introduction

Thank you for choosing iP.1. Our services are intended for use by companies and organizations. You should always be able to feel confident when you submit your personal information to us. Your trust is important to us and we always strive to be open and honest with how your personal information is handled. We have tried to make it as easy as possible to understand this agreement. We want this privacy policy to show how we ensure that your personal data is processed in accordance with the Data Protection Regulation (GDPR).

The purpose is to explain how we use the information you share with us in order to build amazing services, ensure that you understand what information we collect with your permission and what we do with it.

iP.1 Networks AB, VAT SE556671153601, is the data controller, DC, for the processing of your personal data in our services and on this website.

## 2. Collection of information

To access and display any content of our Services, you must register with iP.1 before the content is available to you. During the registration process, you are required to provide us with some contact information, including your name, company, phone number, email address and country. We use this information to contact you about the services we offer in relation to what you have expressed an interest to. Any information we collect is linked to the provision of iP.1 Services and its features.

We may collect and store the following information when you become a customer:

- Registration information, such as your first name, last name, company, username, password (encrypted), email address, mobile number, billing address, IP address and country zip code, and information about your type of subscription.
- We derive which country you are in from your IP address.
- Technical information necessary to provide iP.1 Services such as browser type, language, cookie data software and device you are using. This means, among other things, that you get the right language.

From time to time, we may give you the opportunity to participate in competitions, offers and / or surveys. If you participate, we may ask for certain information beyond the terms of this Privacy Policy, including personal data. Such additional information may be combined with other account information and used as described in this Privacy Policy.

When contacting iP.1 customer support, we may ask you for some information regarding your request, including your name, email address or telephone number. If you send us correspondence, such e-mail or letter, we may collect such information into a file specific to you.

If you participate in any blog or other forums offered by the site or services, your username may appear on content that you submit and will therefore be available to the public. If you associate your name with your User ID, your name, and any related content or posts may therefore be available to the public. You are solely responsible for all liability in connection with your use of such blog or forum.

We collect usage data about you when you use our Services. This can include web pages you visit, what you click on, when you performed these actions, and so on. Like most websites today, our web servers also have log files that register data every time a device accesses these servers. The log files contain data about each access, including originating IP addresses, the files viewed on our webpage (such as HTML pages, graphical elements, etc.), operating system versions, and time stamps. If you come to our website from an external source (as a link on another web page or in an email), we will record information about the source that referred you to us.

If you purchase any of our Services in our online shop as defined on our website [www.ip1sms.com](http://www.ip1sms.com), your credit or debit card information (such as card type and expiration date) and other financial information we need to process your payment, may be collected and stored by us and / or the payment service providers that we work with. We may also collect certain limited information, such as your transaction history, all of which are necessary to provide our Services. In addition, payment service providers usually provide you with some limited information about you, such as a unique token that allows you to make further purchases using the information they have stored, and your card type, expiration date, and certain numbers in your card number.

If you choose to pay by invoice, iP.1 may need to provide information to payment service providers that we may collaborate with, in order to issue invoices, enable credit check and send invoices.

#### **If you create surveys**

Your survey data is owned by you. In addition, iP.1 deals with your surveys as if they were private (except if you have made the surveys available through a public link). We do not sell them to anyone.

We protect the respondents' SMS numbers and e-mail addresses. To make it easier for you to invite people to fill in your surveys via SMS and email, you can upload lists of SMS numbers and email addresses, and in that case, iP.1 acts only as the administrator of this information. We do not sell these SMS numbers and e-mail addresses, and we use them solely as you instruct us, and in accordance with this policy. The same applies to any SMS and e-mail addresses collected through your surveys.

You can back up, share and delete your survey data.

We do not share, and do not abuse, your respondents' SMS numbers and email addresses. You can be sure that iP.1 will not send SMS and email to your respondents or people in your address book, except at your request. We definitely do not sell these SMS numbers and email addresses to any third party.

#### **If you respond to surveys**

By using our services or otherwise by interacting with us, you agree to the following Privacy Policy. Surveys are administered by a survey creator, surveyor. The answers to the survey are owned and processed by the surveyor. We administer the surveys at [www.ip1sms.com](http://www.ip1sms.com) and collect the answers you submit to the creator of the surveys/questionnaires. If you have any questions regarding a survey that you answered, you should contact the surveyor directly, as iP.1 is not responsible for the content of the survey or your answers. The surveyor is usually the same person who invited you to fill in it, and sometimes they have their own privacy policies.

Are your answers anonymous? This depends on how the surveyor has configured the survey. Contact them to find out.

You can unsubscribe so that you no longer will receive SMS and email invitations to surveys sent by out by surveyors.

We do not sell your responses to any third party (but the surveyor can do it, so contact them). iP.1 only works as the administrator to the surveyor, who controls your data, except in the cases described further in this privacy policy.

**By using our Services or otherwise by interacting with us, you agree to the following Privacy Policy.**

### **3. Use of Information**

In accordance with the Service Agreement and the User Agreement, you have given us permission to collect information, we may use the information we collect, including your personal information:

1. to provide and enhance your experience of the Services,
2. to ensure technical functionality, develop new services and analyze your use of the Service,
3. to prevent spam and abuse of our services,
4. to communicate with you for purposes related to the Service or the research purposes, including e-mail, notifications, SMS or other messages, you agree to receive,
5. to communicate with you, for marketing and promotional purposes by e-mail, SMS or other messages, in accordance with the consents you may have provided us through your account settings,
6. to process your payment, or prevent or detect fraud,
7. to improve our website,
8. to improve our customer service and your need for help, and
9. to inform you of important updates and operations. For instance, if our service is temporarily down for maintenance or you forget your password. to inform about important updates and operations. For example, if our service is temporarily suspended for maintenance or you forget your password. Then we can send you SMS and e-mail. In general, you can not opt out of these non-marketing messages. If you do not want to receive these messages, you will be able to disable your account.

### **4. Sharing of information**

We may share your information for limited purposes to service providers to enable them to perform certain functions on our behalf, process user data and help to deliver the service. Service providers will help us understand the use of our Service.

We may also share your information with third parties:

1. to allow a merger, acquisition or sale of all or a portion of our assets,
2. for defense purposes in legal processes (such as a court order or subpoena), if we believe in good faith that it is necessary; to comply with mandatory applicable law; to protect the safety of any person; iP.1 to protect the rights and property, including to enforce the Terms of Use and other terms you have accepted, and to address fraud, security or technical issues,
3. for survey metadata, we can look at statistics such as response rates, amount of questions and answers, and the average number of questions in a questionnaire, and publish interesting observations about this for information or marketing purposes. However, only information in an unidentified format (for example, using so-called hashing) that does not identify you personally,

4. with academic researchers for purposes such as statistical analysis and academic studies, but only information in an unidentified format (for example, using so-called hashing) that does not identify you personally, as well as
5. to publish unidentified or aggregated usage information and show trends on the use of iP.1 Services, as indicated in this privacy policy.

## 5. Your settings

We provide you with settings that allow you to choose which communications you receive from us and manage your SMS and surveys.

We generally keep your data as long as you have an account with us, or to fulfill our legal obligations,, resolve disputes and ensure compliance with our terms.

To delete and/or edit, you can adjust the settings in your account on our website. Deletion of survey data and SMS will not be permanently deleted immediately. As long as you have an account with us, we may keep your deleted data for a limited time, if you deleted something by mistake and need to restore it (which you can request by contacting our support). As far as the law allows, we will delete your data permanently should you ask to terminate your account. Deleted content may remain in backup media in another location up to 12 months. Your sent SMS are deleted automatically after 3 months.

## 6. Transfer to other countries

iP.1 store and process personal data within the EU / EEA.

Your personal information may therefore be subject privacy laws that differ from the laws in your home country. iP.1 will treat your information as described in this Privacy Policy. iP.1 website may contain links to websites operated or owned by someone other than iP.1. We are not responsible for the processing of your personal data carried out on these websites.

## 7. Security

We encrypt our services using SSL. It is important for us that our users' information is protected. Your password protects your user account, so you should use a unique, strong password, restricting access to your computer and browser, and log off after using the Services. Even though we observe precautions for data protection, no security measures are completely safe and we can not guarantee the safety of user information. Due to factors beyond iP.1's control, iP.1 can not ensure that personal data will not be disclosed to third parties.

We need your help for iP.1 Services to continue to be secure, which means that you commit to the following:

1. You may not send unauthorized commercial messages (such as spam SMS or surveys).
2. You may not upload viruses or other malicious software.
3. You may not attempt to collect credentials or access accounts belonging to others.
4. You must not bully, harass or threaten anyone.
5. You may not publish content that is: is hateful, threatening, inciting violence.
6. You may not use iP.1's Services to perform any unlawful, misleading, malicious, or discriminatory act.
7. You may not use iP.1's Services if you are under 13 years, or store data on children under 13 years.
8. You will keep your contact information current and accurate.

9. If you change or deactivate your mobile telephone number, please update your account information at iP.1 within 48 hours to ensure that your messages are not sent to the person who gets your old number.
10. If you collect information from users, and get their consent, you should make it clear to them that it is you (and not iP.1) who collect the information, as well as publish information detailing what information you collect and how to use them. You are then the Data Controller, DC, and our Data Processor Agreement applies.
11. You must not do anything that could disable, overburden, or impair iP.1 Services, (such as a DoS attack).
12. You may not assist or encourage any violations of the terms of this statement or in the Privacy Policy.

For example, we constantly monitor our systems to make sure that they are functioning properly and to detect and correct errors.

## **8. Changes of the Privacy Policy**

Sometimes we can, free of choice, make changes in the Agreements. When we make significant changes to the agreements, we will send you a clear message based on what is appropriate with regards to the circumstances, eg by showing a clear message in the Services or by sending e-mail and text messages to you. In some cases, we will notify you in advance, and your continued use of the Services after the changes have been made will constitute your approval of the changes. Therefore, we ask that you please make sure that you read all such messages carefully. If you do not want to continue to use the Services in accordance with the new version of the Agreement, you can terminate the Agreement by contacting us through Customer Service and e-mail.

## **9. Information about cookies, other technologies**

If you download or use our software, such as a standalone software product, applications or a plug-in for the browser, you agree that the software sometimes downloads and installs upgrades, updates, and other features from us in order to improve and further develop the software.

You may not modify, create derivations, decompile or otherwise extract the source code from us unless you are expressly authorized to do so under an open source license, or if we grant you permission in writing.

A cookie is a text file stored on your computer, mobile phone or other device when you visit a website. The cookie helps website providers recognize your device the next time you visit their site.

We use both session cookies (which expire when you close your browser), and persistent cookies (which remain on the device for a certain amount of time or until you delete them).

We use the following types of cookies for the purposes described below:

### **Necessary operational**

These cookies are necessary in order for us to provide the iP.1 Services that you have requested. For example, they let us know what kind of device you're browsing from and can provide you with services tailored accordingly.

## **Performance / Analysis**

We use these cookies to analyze how iP.1 service is accessed, used, or performing. This information is used to maintain, operate and continuously improve iP.1 Services. We can also receive information from our newsletters via SMS and e-mail, including if you have opened or forwarded a newsletter or clicked on any of its content. This information tells us how effective our newsletters are and helps us to ensure that we deliver information you find interesting.

## **Functional**

These cookies allow us to carry out certain functions in iP.1 Services in accordance with the choices you make. This means that when you continue to use or return to iP.1 services, we can offer our services as requested by you, for example by knowing your username, remembering how you have adapted our Services and can remind you of content that you've read or in other way taken part of.

## **Cookies we use**

*Analytical / performance cookies Google Universal Analytics \_ga*

This helps us to count how many people visit www.ip1sms.com by tracking whether you have visited our website before.

*Analytical / performance cookies Google Universal Analytics \_gid*

Used to distinguish users in order to get a picture of frequently recurring visitors who use iP.1's Services.

*Analytical / performance cookies Google Universal Analytics \_gat*

Used to handle the rate at which page view requests are made.

*Analytical / performance cookie, Google Analytics \_utma*

Like \_ga, we'll know if you've visited www.ip1sms.com before, and thus we can figure out how many of our visitors are new to www.ip1sms.com or to a particular page.

*Analytical / performance cookie, Google Analytics \_utmb*

Works with \_utmc to calculate the average length of time you spend on www.ip1sms.com.

*Analytical / performance cookie, Google Analytics \_utmc*

Works with \_utmb to calculate when you close your browser or tab.

*Analytical / performance cookie, Google Analytics \_utmz*

This tells us how you have reached www.ip1sms.com (eg from another site or a search engine).

*Analytical / function cookie DoubleClick*

Used to measure conversions and possibly display advertising material based on the user's interests and previous visits.

*Analytical / Function cookie cb-enabled*

Used to remember if you accept the use of cookies on www.ip1sms.com.

We may also engage third parties from time to time, to track and analyze non-personally identifiable usage and volume statistics information from site visitors to help us manage the site and improve its quality. Such third parties may use cookies to help track visitor behavior. Such cookies will not be used to associate individual visitors with any personal information (as defined below). All data collected by such third parties on our behalf is used solely to provide us with information about website use and is not shared with any third party.

#### **Manage your cookie settings and other settings**

Many browsers allow you to manage your settings. You can set your browser to refuse cookies or delete certain cookies. You may be able to handle other technologies in the same way that you manage cookies using your browser settings. Note that if you choose to block cookies, it may cause iP.1 Services deteriorate or prevent certain parts of it from functioning.

One of the services we use to track activity related to our Services, such as by placing cookies, is Google Analytics. We may use vendors, including Google, using first-rate cookies (such as Google Analytics cookies) and third-party cookies (such as Doubleclick cookies) including Google Analytics for Display Advertising, together to inform and optimize based on your previous visits to our sites. Google provides tools for managing the collection of data and use of certain tasks that are performed through Google Analytics on [Tools.google.com/dlpage/gaoptout](https://tools.google.com/dlpage/gaoptout) and through Google Analytics for Display Advertising or the Google Display Network by using Google's ad settings at [google.com/ Settings / ads](https://google.com/Settings/ads).

**You hereby consent to the use of cookies and other technologies as described above.**

We have done our best to make our privacy policy legible and understandable. If you have further questions, please contact us by e-mail at [info@ip1.se](mailto:info@ip1.se)

Thank you for reading our Privacy Policy. We hope you enjoy iP.1!

#### **Data Controller:**

iP.1 Networks AB  
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