**Privacy Policy**

**Introduction**

Before using, tesey.eu website, web-client and/or other websites, products and services that contain links to this policy (hereinafter referred to as **“Resources”**), please read the Privacy Policy carefully (hereinafter referred to as **“Policy”**).

Using Resources, you entrust us your personal data. In the Policy we describe measures that are being taken to ensure confidentiality and to justify your trust in us.

*Last changes: April 1, 2020*

*Enforcement date:April 1, 2028*

**General Provisions**

* 1. Following Policy has been developed by Tesey company. All copyrights and exclusive rights to the Resources are the property of Tesey company.
  2. This document provides the following information:

- which personal data of our clients as well as other natural persons who got access to the Resources, that contain reference to the Policy, and use them, Tesey company collects;

- purposes for collecting mentioned personal data, ways of its processing and using.

- the retention period for personal data that was collected.

- other information related to personal data collection and processing by Tesey company.

For purposes of the Policy, terms “information” and “data” are used as synonyms.

* 1. By using Resources you understand that we will collect and use your data in a way, in volume and with a purpose, as described in the Policy.
  2. By using Resources, you agree with the terms of the Policy. If you do not agree to any provision of the Policy or with the Policy generally, you are not allowed to use Resources and you should immediately terminate such usage.
  3. The Policy does not apply to any third-party websites and mobile applications that you may use, including any that are linked to in our Resources. You should review privacy policies for third-party websites and apps before clicking on any links.
  4. We recommend that you consult the Policy prior to using Resources in order to inform yourself of your obligations.

1. **About the company**
   1. We are Tesey company that is incorporated under \_\_\_\_\_\_\_\_\_\_\_\_law. The registration number is \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.
   2. In this Policy:

- «We/Us» means Tesey company;

- «Third party» means someone who is not you or us.

1. **Contacts**

3.1. If you have any questions about our privacy statement, you can email us at:[info@tesey.eu](mailto:info@tesey.eu) .

3.2. Our mailing address is:

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1. **How we collect data**
   1. To provide and improve our Resources and to support advertising and marketing, we collect information about visitors to our sites, users of our Services, the devices they use, and their locations.
   2. We collect certain information directly from you, such as when you fill out forms with a name, email address, name of a company, position, phone number etc. We collect other information, usually about devices, browsers, or locations, automatically (without you typing it into a form).
   3. We may also collect data about you from other sources, such as if we purchase a list of contact information of people who may be interested in our services.
   4. You have choices about whether you visit our sites, install our apps, or provide information to us. However, if you do not provide us with certain information, you may not be able to use some parts of our Services.
2. **Information we collect about You.** 
   1. You provide us with information about yourself when you:

* fill out forms with a name, email address and other information.
* Contact customer support
* Comment on our blogs or in community forums
  1. Examples of the information you provide are: name, email address, mailing address, phone number, company, position, etc.
  2. The types of information we collect about you when you visit and interact with this site are:
* Your contact details such as name and email address where you have contacted us through this site; or
* If you have agreed to cookies, data such as your site preferences or language settings. We can also use this information in an aggregate manner to understand how our visitors navigate this site so we can make it better.

1. **Information We Collect Automatically.** 
   1. We automatically collect information from you and your devices when you use our Services, even when you visit our sites or apps without logging in.
   2. The information we automatically collect includes:

* Device, Usage Information, and Transactional Data. We collect information about how you use our Services and the computers or other devices, such as mobile phones or tablets, you use to access our Services. Some examples include:
* IP address
* Precise geolocation information that you allow our apps to access (usually from your mobile device)
* Unique device identifiers and device attributes, like operating system and browser type
* Usage data, such as: web log data, referring and exit pages and URLs, platform type, number of clicks, domain names, landing pages, pages and content viewed and the order of those pages, the amount of time spent on particular pages, the date and time you used our Services, the frequency of your use of our Services, error logs, and other similar information

1. **Cookies and Related Technologies.** 
   1. We may use cookies, which are text files containing small amounts of information that are downloaded on your device (“Cookies”), or related technologies, such as web beacons, local shared objects and tracking pixels to store or collect information. We also allow others to use Cookies within the Services as described below. Cookies can store your preferences, your username, and help tailor advertisements.
2. **Analytics.** 
   1. We use services like Google Analytics. They use Cookies to gather usage data and help us learn how people use our Services, such as the pages they visit and for how long and the website or page they were on before coming to our website.
3. **Information We Collect from Other Sources.** 
   1. We may collect information about you from others, such as:

* Third-Party Sources. Examples of third-party sources include marketers, partners, researchers, affiliates (like companies connected to Tesey company), and others where they are legally allowed to share your information with us.
* Other Customers. Other customers may give us your information.
* Combining Information from Different Sources. We may combine the information we receive from other sources with information we collect from you (or your device) and use it as described in this Privacy Policy.

1. **Data we collect and process on behalf of customers.**

10.1. When our customers use Resources, we process and store certain data on their behalf. For example, when User of Resources downloads contracts or other documents for verification or signing, we act primarily as a data processor and process information on behalf of the client and in accordance with his instructions. In these cases, the client as a data controller is responsible for most aspects of information processing. If you have any questions or concerns about how the information is processed in these cases, including how to use your rights as a data object, we recommend you to contact he appropriate client.

1. **Data use**

11.1. In general, we collect, use and store or process your data to provide our services, to correct and improve them, to develop new services and to sell our products and services. Here are some examples of how we use the data we process:

- We provide you with services and products that you request, and receive payments.

- Analyze market opportunities, products or special events using email or phone. We send marketing messages about third-party products and services that, in our opinion, may be of interest to you.

- We collect the data about what is happening with electronic documents, for example, who viewed or signed them, which devices were used and when these events occurred.

- We use data for competitions.

- We provide content and individual advertising.

- View data about our users and how they use our services.

- We are testing changes in our Services and developing new features and new products.

- We eliminate problems that may arise with our Services, including answering support questions and resolving disputes.

- We manage the platform, including support systems and security

- We prevent, investigate and take action in the event of fraud, unauthorized access or use of our Services, violation of conditions and policies or other unlawful actions.

11.2. Other use. We may combine the data we collect or remove some of the information to limit or prevent the identification of any particular user or device for use in research and marketing.

11.3. Legal grounds for processing your data. If the GDPR is applied, and Tesey company acts as a data controller, then our legal basis for collecting and using the information described in this Privacy Policy will depend on the data we collect or use.

11.4. We usually collect or use data about you or about other persons only within the framework of your consent to this, in the case when we need data to conclude a contract with you or when processing is in our legitimate interests, and not redefined by your data protection interests or fundamental rights and freedoms. In some cases, we may have a legal obligation to collect or store personal data. Personal data may also be required to protect your interests or the interests of another person. For example, when we:

• Use data to create and manage your account. We need these data to provide you with the appropriate services.

• Collect and record data related to the use of a digital certificate or digital signature in order to comply with current legislation.

• Use names and email addresses for email marketing purposes. We do this with your consent (which you can withdraw at any time).

• Collect usage data and analyze it to improve our Services. We do this based on our legitimate interest in maintaining and improving our Services.

11.5. If you have questions or need additional information, please contact us using the contact information provided in clause 3.1. of the Policy.

**12. Data Exchange**

12.1. We do not rent, sell or transfer your data to third parties, except in the cases described in the Policy.

12.2. We exchange data with third parties only in the following cases:

- Data exchange with service providers. We share data with other companies that we use to support our Resources. These companies provide services such as search technology, advertising, authentication systems, invoice collection, fraud detection and customer support. Our service providers are committed to protecting your personal data and cannot use it for their own purposes.

- Data exchange with affiliates. We may share your personal data with other companies related to Tesey company in matters of ownership. These companies use your data in the manner and subject to the conditions described in the Policy.

- Data exchange to ensure safety, security and compliance. We may transfer your personal data in accordance with applicable law or respond to requests from courts and regulatory authorities that have legitimate reasons to require such data. We may also share your personal data when there is a threat to the physical security of any person, violation of this Privacy Policy or other agreements or protection of the legal rights of third parties, including our employees, users or the public.

- Business operations. We may share your personal data during a corporate transaction, such as a merger or sale of our assets. If a corporate transaction occurs, we will provide a notification of any changes in the management of your data.

- Consent. We may transfer your personal data in other ways if you have asked us to do so or have agreed to it.

12.3. We can also share your data when you allow others to access, use or edit content in your account, we share this content with them.

12.4. Profile information. When you create a profile in our products as an employee, other users of the company where you work can view information about your profile. If you want to keep this information confidential, go to your account settings.

12.5. Your employer or organization. When you create an account or user role with an email address assigned to you as an employee, contractor, or member of an organization, the organization can find your account and take certain actions that may affect your account.

**13. Data storage**

13.1. If the need to store your data is provided by law, we will keep your data for the period prescribed by law. If we do not have obligations under the law regarding data storage, we will store them as much as we need.

13.2. We store your personal data no longer than the period required for the purposes for which it is processed. The length of time during which we store data depends on the purposes with which we collected and used it, and / or in accordance with the requirements of the law. Where there are technical restrictions that prevent deletion or anonymity, we retain personal data and limit their active use.

**14. Freedom of choice**

14.1. This section describes the list of actions you can take to change or limit the collection or use of your data.

14.2. Profile. You can access and view your profile information. If any information is inaccurate or incomplete, you can make changes to your account settings, according to the user's authorization given to you.

14.3. Marketing messages. You can opt out of the emails that we send you. This can be done by clicking on the "unsubscribe" link in the email. Please note that we can send you one message to confirm that you want to refuse. If you are a registered user of our Resources, we can continue to send messages with the information that you need to work in Resources (for example, to send notifications) even after you refuse marketing messages. To refuse other direct marketing from us, please contact us.

14.4 You can refuse to use cookies through your browser settings. However, if you refuse to use cookies, you will not be able to use some of our Services.

14.4. To change the way Google Analytics collects and uses your data, you can install the Google Analytics Debug Browser by clicking here (https://tools.google.com/dlpage/gaoptout).

14.5. Information about the device and use. If you do not want us to see your device location, you can disable sharing of places on your device, change the privacy settings of your device.

14.6. Account closure. If you want to close your account, go to your account settings.

14.7. Complaints. We are committed to responding to privacy concerns and / or use of your personal data. For questions or complaints regarding the use of data or the Policy, please contact us using the email address info@tesey.eu.

**15. Confidentiality of children's personal data.**

15.1. Our services are not for people under the age of 18 (“minors”) and are not provided to them. We do not knowingly collect or request data from minors. We do not knowingly allow minors to use our Services. If you are a minor, please do not use our Services or send us your details. We delete the information we are studying, we collect from a minor without the confirmed consent of the parents. Please contact us using info@tesey.eu if you think that we may have data from or about a minor.

**16. How we protect personal data**

16.1. To keep your data safe, we use physical and electronic tools. We apply these tools based on the sensitivity of the data we collect, use and store, and the current state of technology. Although we are taking steps to prevent unauthorized access to or use of personal data, the Internet and our services are not 100% protected. For this reason, we cannot guarantee that the data we collect or store will always be protected from unauthorized access to 100% or that they will be used only in accordance with the Policy.

16.2. Nevertheless, we have specialized security groups that constantly review and improve our measures to protect your personal data from unauthorized access, accidental loss, disclosure or destruction of data.

16.3. We cannot be held responsible for any unauthorized access or loss of personal data that is beyond our control.

**17. Policy Changes**

17.1. We may make changes to the Policy to reflect changes in legislation, our company, our Resources, the use and practice of data collection or advances in technology. Our use of the data we collect depends on the Policy in effect at the time that such data is used. Depending on the type of change, we may notify you of the change by posting on this page or by email. Please carefully read any changes made to the Policy.