Gmail

Sergei Tokmakov, Esq. <sergei.tokmakov@gmail.com>

Privacy Policy
8 messages

Stan Byun <stanb@local.express>   Mon, Sep 22, 2025 at 7:48 PM
To: Sergei Tokmakov <sergei.tokmakov@gmail.com>
Cc: Irina Basina <irinab@localexpress.io>

Hi Sergei,
Hope things are well.

"I" lost track of where we are on the Privacy Policy... I believe you updated one for us before.... not sure if it's been updated on our website.

For now, can you update our existing policy to solve these questions that we need to address/comply in our CRM system (Hubspot) https://www.localexpress.io/privacy-policy

Please request more info/context from Irinia if needed. She is our Head of Rev Ops.
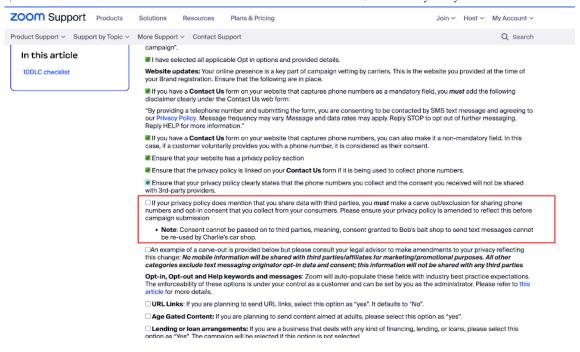Cheers, Stan

1)
It also would be preferred if we could add the following to our privacy policy:

No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All other categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

In case this is true, of course. But I believe it is.
Dear @Stan Byun, will you be so kind as to help me understand if in our privacy policy we have smth similar that can cover this statement above, cause I, honestly, did not identified anything that means the same :disappointed:

ZOOM Support   Products   Solutions   Resources   Plans & Pricing   Join ⌄   Host ⌄   My Account ⌄

Product Support ⌄   Support by Topic ⌄   More Support ⌄   Contact Support   🔍 Search

In this article

10DLC checklist

campaign".

☑ I have selected all applicable Opt in options and provided details.

Website updates: Your online presence is a key part of campaign vetting by carriers. This is the website you provided at the time of your Brand registration. Ensure that the following are in place.

☑ If you have a **Contact Us** form on your website that captures phone numbers as a mandatory field, you **must** add the following disclaimer clearly under the Contact Us web form:

"By providing a telephone number and submitting the form, you are consenting to be contacted by SMS text message and agreeing to our Privacy Policy. Message frequency may vary. Message and data rates may apply. Reply STOP to opt out of further messaging. Reply HELP for more information."

☑ If you have a **Contact Us** form on your website that captures phone numbers, you can also make it a non-mandatory field. In this case, if a customer voluntarily provides you with a phone number, it is considered as their consent.

☑ Ensure that your website has a privacy policy section

☑ Ensure that the privacy policy is linked on your **Contact Us** form if it is being used to collect phone numbers.

☑ Ensure that your privacy policy clearly states that the phone numbers you collect and the consent you received will not be shared with 3rd-party providers.

☐ If your privacy policy does mention that you share data with third parties, you **must** make a carve out/exclusion for sharing phone numbers and opt-in consent that you collect from your consumers. Please ensure your privacy policy is amended to reflect this before campaign submission

- **Note**: Consent cannot be passed on to third parties, meaning, consent granted to Bob's bait shop to send text messages cannot be re-used by Charlie's car shop.

☐ An example of a carve-out is provided below but please consult your legal advisor to make amendments to your privacy reflecting this change: *No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All other categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties*

Opt-in, Opt-out and Help keywords and messages: Zoom will auto-populate these fields with industry best practice expectations. The enforceability of these options is under your control as a customer and can be set by you as the administrator. Please refer to this article for more details.

☐ **URL Links**: If you are planning to send URL links, select this option as "yes". It defaults to "No".

☐ **Age Gated Content:** If you are planning to send content aimed at adults, please select this option as "yes".

☐ **Lending or loan arrangements:** If you are a business that deals with any kind of financing, lending, or loans, please select this option as "Yes". The campaign will be rejected if this option is not selected.

2)

UPD: we don't have anything about mobiles, so we need to add it, otherwise we will not be able to use SMS.. and I was asked about that so many times :disappointed: dear @Stan Byun, I'm relating on you in this matter - please, let me know when you have such opportunity, if I can request our website guy (Zahar) through Marina to update our Privacy Policy to make it fully compliant to the current laws enforcement to meet our communication needs. :pray:

many-many thanks in advance :

Website Requirements

Privacy Policy   Your brand website **must have** a privacy policy. Please **enter a link to the privacy policy** section of your brand website.

If your privacy policy **mentions sharing or selling of consumer personal information** (including phone numbers) to third parties or affiliates for marketing or lead generation, your campaign **will be rejected**.

If you **do not share or sell consumer personal information**, you **must mention this** in your privacy policy. Here's an **example** of how you can mention this.

URL for privacy policy * ⓘ

| https://www.localexpress.io/privacy-policy | 42/200 |

[Verify] ⓘ

Our system could not detect the correct text in your privacy policy. You may proceed if you believe you have the correct text in place but if you do not have the correct text your campaign will be rejected.

Screenshot of privacy policy * ⓘ

Max file size is 10MB. Supported file types are JPG, and PNG.

[Upload]

☐ I confirm that I have added the required privacy policy to my brand website and understand that my campaign will be rejected without this update.

--

Stan Byun | V.P.

p: +17472241788

a: 600 N. Brand Blvd. Suite 620
Glendale, CA 91203

Web: www.localexpress.io

Sergei Tokmakov, Esq. <sergei.tokmakov@gmail.com>   Mon, Sep 22, 2025 at 11:54 PM
To: Stan Byun <stanb@local.express>
Cc: Irina Basina <irinab@localexpress.io>

Hi Stan,

Attached is the updated Privacy Policy. I kept the original text intact and only added narrowly-tailored language necessary to cover the SMS/text messaging program and to satisfy the requirements you flagged. Summary below.

What changed (and where)

1. **"Last updated" date.** Updated to reflect the new effective date.
2. **Scope:** Added a single sentence clarifying that the Policy also governs our **SMS/Text Messaging programs**.
3. **New section: "Mobile (SMS/Text Messaging) Information"**
   - Defines the limited data we collect for messaging (mobile number, carrier, delivery/consent logs, preferences).
   - States we **do not collect message content beyond what's necessary** to operate the program.
   - Explains purposes: operate the program, document consent, troubleshoot, prevent fraud/abuse, and comply with law/carrier rules.
4. **New section: "Text Messaging Program Terms (Opt-In, Opt-Out & Assistance)"**
   - Provides the required disclosures and commands: **STOP** to opt-out, **HELP** for assistance.
   - Includes "**Message frequency varies. Message & data rates may apply.**"
   - Clarifies **consent is not a condition of purchase**.
   - Includes the **carrier liability disclaimer** for delays/undelivered messages.
   - Confirms **18+ eligibility** and that we retain **consent records**.
5. **Use/Sharing sections – narrow insertions**
   - **Use:** Adds a short line stating we use Mobile Information to run the program, honor preferences, troubleshoot delivery, and comply with carrier/legal requirements.
   - **Sharing (important):** Adds an explicit **prohibition**—
     We do not sell or share mobile numbers, text messaging originator opt-in data, consent data, or SMS/MMS metadata with third parties or affiliates for marketing or promotional purposes.

     - Allows sharing **only with carriers/SMS vendors** to deliver messages and comply with law, with contractual limits barring them from using Mobile Information for their own marketing.

5. **No other edits.** No deletions or abridgments to the policy language. Existing merchant/merchant-customer provisions, cookies, CCPA, DNT, etc., are unchanged.

How this meets your requests

- **"Don't sell/share mobile data"** requirement → Addressed verbatim in the Sharing section and reiterated in the Mobile section.
- **Clear opt-in/opt-out mechanics** → STOP/HELP commands, message/data rate notice, frequency statement, and "not a condition of purchase" are now spelled out.
- **Carrier/industry expectations** (TCPA/CTIA playbook items) → added the carrier liability disclaimer, consent recordkeeping, and age-gate language, which align with typical carrier audits and SMS platform requirements.

Sergei

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📄 **Privacy Policy of Local Express.docx**
27K

Stan Byun <stanb@local.express>   Tue, Sep 23, 2025 at 1:46 PM
To: "Sergei Tokmakov, Esq." <sergei.tokmakov@gmail.com>
Cc: Irina Basina <irinab@localexpress.io>

Thank you Sergei,

@Irina Basina can you review and upload to our website and see if it'll work? (pass Zoom test)

P.S. I'm will also forward "concerns" from Oleg to Sergei. Hope we can get a update one also soon, and we can upload it also. It's up to Irina to decide whether to wait or upload now. TY
[Quoted text hidden]

Stan Byun <stanb@local.express>   Tue, Sep 23, 2025 at 1:58 PM
To: "Sergei Tokmakov, Esq." <sergei.tokmakov@gmail.com>, Oleg Borovik <olegbo@localexpress.io>
Cc: Irina Basina <irinab@localexpress.io>

Hi Sergei,

Thank you. We have more requests:

@Irina Basina once the Policy is updated -- will you be uploading the new one to our website? or Marina? TY

NEW:
From Oleg : Product manager.

Hi Sergei, If any questions, can you ask Oleg directly for clarification? Thank you.

Please update the Sep 22,25 version with :

Could you please assist me with the following. We are working on some platform improvements and would like to update our Privacy Policy accordingly.

1. 'Vivek's case. We have a potential lawsuit regarding data privacy and California's Invasion of Privacy Act (CIPA). A customer typed his name in the search field of the store, found that his name appeared in the browser console (as a part of the URL sent to google analytics), and is claiming that this is 'personal' data that should not be transmitted.
We are now hashing search terms in the link (to be released at next week on Prod). We would also like to update our Privacy Policy with something like:

To understand how our customers use the site/app and improve their experience, we may share non-personal user data with third-party services like Google Analytics (including search terms). This data is anonymous and cannot be used to identify any individual.

2. AI for product images. We are close to use AI for product image generation. Because of that, we need to update our Privacy Policy with something like this:

Some product images on the site/app are generated by artificial intelligence (AI) for illustrative purposes. They are intended to represent products but may not be perfectly accurate in depicting exact details, colors, textures, or proportions. We recommend reviewing the product specifications for precise information.

These text are very rough. Could you please update them as needed and update our Privacy Policy template accordingly or point me to the right person who can help with that.
Thanks in advance!

On Mon, Sep 22, 2025 at 11:54 PM Sergei Tokmakov, Esq. <sergei.tokmakov@gmail.com> wrote:
[Quoted text hidden]

Sergei Tokmakov, Esq. <sergei.tokmakov@gmail.com>   Tue, Sep 23, 2025 at 6:01 PM
To: Stan Byun <stanb@local.express>
Cc: Oleg Borovik <olegbo@localexpress.io>, Irina Basina <irinab@localexpress.io>

Hi Stan,

Attached is the edited Privacy Policy. All **new or modified sections/subsections are highlighted in yellow** for quick review.

What I changed:

1. **Technical Personal Information**
   Added one bullet under this section to capture search query analytics **only in de-identified form**.

   "Site/app search interaction data (e.g., search terms), which we de-identify prior to transmission (for example, by hashing or truncation) and do not combine with information intended to identify you."

2. **How We Collect & Use Information**
   - **Inserted a labeled paragraph** immediately after the three-item list describing collection methods and **before** the sentence beginning "We use Personal Information…":

     Analytics (including site search). Explains that we (a) use de-identified site search data, (b) configure analytics not to send personal identifiers in URLs/search parameters, (c) hash/truncate terms before transmission, and (d) do not treat de-identified analytics/search data as Personal Information unless re-identified (which we do not do).

3. **How We Share Information**
   - **Appended two short paragraphs** immediately after the existing "Analytics partners, such as Google Analytics" paragraph:
     - **Analytics safeguards.** Confirms we do not transmit personal identifiers (names, emails, account IDs) in URLs/search parameters/analytics payload fields and that search data is de-identified before transmission and used only in aggregate/de-identified form.
     - **No sale/share of search terms as personal data.** States we do not sell or share search terms or related analytics payloads as personal information for cross-context behavioral advertising or third-party marketing purposes.

4. **AI-Generated Product Images (Illustrations)**. **New standalone section** placed **after** "Third-Party Links" and **before** "Do Not Track (DNT) Requests." Clarifies some images may be AI-generated, may not be perfectly accurate, directs users to **product specifications** for definitive details, and provides a **support contact** for corrections.

Sergei
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📄 **Privacy Policy of Local Express.docx**
28K

Stan Byun <stanb@local.express>   Tue, Sep 23, 2025 at 7:15 PM
To: "Sergei Tokmakov, Esq." <sergei.tokmakov@gmail.com>

Cc: Oleg Borovik <olegbo@localexpress.io>, Irina Basina <irinab@localexpress.io>

Sergei,

Thank you very much for your prompt attention.

@Irina Basina, can you update the website privacy and see if it will pass the Zoom test?
@Oleg Borovik, please review and forward any questions directly to Sergei.

Thank you,
Stan

[Quoted text hidden]

Irina Basina <irinab@localexpress.io>   Wed, Sep 24, 2025 at 7:38 AM
To: Stan Byun <stanb@local.express>, Zahar Tarasov <zahart@localexpress.io>
Cc: "Sergei Tokmakov, Esq." <sergei.tokmakov@gmail.com>, Oleg Borovik <olegbo@localexpress.io>

hey! thanks everyone for collaboration! finally we moved forward with this question. dear @Stan Byun, I don't have access to our website, but I can request @Zahar Tarasov to update it, since I will ask him about that anyway - since tomorrow we're switching to the zoom phone number and we will need to update our company main phone number anyway.
btw, it will be: +1.818.245.57.58

Kind Regards,

Irina Basina | **Head of Revenue Operations**
p: 818.446.9896
a: 600 North Brand Blvd, Suite 620, Glendale, CA 91203
w: localexpress.io

[Quoted text hidden]

Irina Basina <irinab@localexpress.io>   Fri, Sep 26, 2025 at 5:27 AM
To: "Sergei Tokmakov, Esq." <sergei.tokmakov@gmail.com>
Cc: Stan Byun <stanb@local.express>, Oleg Borovik <olegbo@localexpress.io>

Hi Sergei!
Thanks!
Thank you @Stan Byun, I'll take it from here.

Сергей, извините, никак не могу понять - почему мы дважды абзац с Types of Information We Collect повторяем?...
Так же, адрес наш старый был указан в абзаце About Us, я исправила на новый.

Types of Information We Collect

"Personal Information" means information that can be used to identify you (such as name, address, or date of birth).
Basic Personal Information is provided by you and includes or may include:

- Name
- Telephone number
- Email address
- Home address
- Date of birth
- Credit or debit card or payment information

This Basic Personal Information may be collected when you register with us by creating an account on our website, request to use or purchase our products and services, or look to conduct a transaction for our products or services with us.

@Sergei Tokmakov, Esq., можете, пожалуйста, ответить на это вопрос по дубликации and we're good to go.
 Спасибо!
Kind Regards,

Irina Basina | Head of Revenue Operations
p: 818.446.9896
a: 600 North Brand Blvd, Suite 620, Glendale, CA 91203
w: localexpress.io

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