

Privacy Policy – AdOpt

(Latest version as of XX/XX/XXXX)

(Last updated on XX/XX/XXXX)

Welcome!

Before we begin, let's establish a formality: in the text of our privacy policy, we will use "You" (with a capital Y) whenever we refer to the individuals who use our website, application, and social media.

Furthermore, whenever we mention "**Customers**" or "**Users**," we are referring to those who have contracted our services. Customers are those who use the paid version of our services, while Users are those who use the free version.

Another important thing: **only use and register on this website or application if You agree to our privacy policy!**

Therefore, before accepting our Privacy Policy, we want to explain who we are, what we do, and how we will handle your information.

So, it's important to take some time to read it here! If you prefer,

You can go directly to any of the topics below:

- **What is AdOpt [1]?**
- **You mentioned "Privacy"?**
- **Why do we need your data?**
- **What data do we collect and how is it used?**
- **What about sensitive personal data?**
- **How do we handle personal data of children and adolescents?**
- **Who do we share personal data with?**
- **International data transfers?**
- **Pay attention to your rights!**
- **About updates to this privacy policy.**
- **Acceptance of the privacy policy.**

What is AdOpt?

AdOpt was born with the mission of making privacy increasingly valued as a right for each one of us.

This purpose led us to develop the **AdOpt solution**, which aims to give control to everyone who navigates the Internet over their personal data and assist

companies in collecting, communicating, and controlling consent given by visitors to their websites in a simple and lawful manner.

Consent is one of the legal bases under the General Data Protection Law No. 13.709/2018 (LGPD), but we have also studied and adapted our processes since Law No. 12.965/2014, also known as the Internet Civil Rights Framework.

We made sure that all processes and products we create are well-designed with a light, intuitive, easy-to-understand design focused on privacy.

And how does it work today? **AdOpt** has developed a Consent Management Platform ("CMP"). From the perspective of Customers and Users, it is software installed on the company's website. From the perspective of site visitors, it is seen as the "Cookie Banner."

The Cookie Banner, when installed on our Users' and Customers' websites, serves the purpose of:

Communication and Information

- It communicates to visitors that the respective website uses cookies and informs them about their purposes, options, and the main communication links (as required by the LGPD).

Recording

- For each visitor accessing the Customer's or User's website, we create an Internet Cookie (100% encrypted and anonymized) and store it in the visitor's browser with the chosen cookie usage settings. After storing, we register in our systems that our client X, from website X, received a "New Cookie X1-Y2-Z3-@4" (Hypothetical example of the encryption code, created with the consent given or not).

Control

- If the visitor returns to the website at another time, the accessed pages will observe the visitor's cookie settings. Additionally, they can access pages to request unsubscription or query stored personal data from the website administrator (all through the AdOpt tool).
- Therefore, at the moment of the request, the website administrator is notified, and they can process it to respond to you as soon as possible!

Note: In this [article](#), we provide a step-by-step guide on how a cookie notice works, in detail!

You mentioned "Privacy"?

We take your privacy very seriously at **AdOpt** because we believe it is a great responsibility to receive your personal data (such as your name and email address). Therefore, we want to explain how and why we collect your data and

how it will be processed, stored, and protected in accordance with the **Brazilian General Data Protection Law (LGPD)**.

Personally, with other companies, organizations, or individuals.

Under the criteria of the LGPD, we are only DATA PROCESSORS (Article 5, VII of the LGPD) as we act on behalf of the DATA CONTROLLERS, namely our Customers and Users.

Why do we need your data?

AdOpt only directly collects personal data in 4 situations:

1. When a company or individual accesses our services and creates an account by providing their registration and payment details. By accepting this Policy and our Terms of Use.
2. When a visitor accesses the website(s) of our Customers and Users and directly requests "Opt-Out" (unsubscribe) or requests a consultation of the personal data stored by our Customers and Users (website administrators). We refer to this request as a "Download Request," and for this, the visitor must provide their data so that our Customers and Users can attend to them. In this function, we work as intermediaries for our Customers and Users.
 - Here is a [link](#) detailing how our Opt-Out process works.
3. When you access our Help Center and fill out the Form to create a Support Request or provide your data for the creation of tickets via chat conversations with our support agents.
4. When you subscribe to our Newsletter.

In summary, your data will be used for the following **purposes**:

- a) Maintain **you** in our **user** and/or **customer** database if **you** install our software and register.
- b) Allow us to communicate with **you** whenever necessary.
- c) Send news, promotions, and information about our services, software updates, or Privacy Policy.
- d) Improve our services, personalize, develop, and enhance our platform, applications, services, and features by identifying and using the information we have about you, such as your interaction with our website, most-used features, content with the highest engagement, and your preferences regarding our services in general.

e) Generate aggregated and anonymous statistical reports on the operation and functioning of our websites and applications. **In this case, no personal data will be used in the report.**

f) Conduct interviews and satisfaction surveys about our platforms and services.

g) Transmit visitor requests from our **Users'** and **Customers'** websites, automatically processing their Opt-Out or Data Download requests.

What personal data do we collect and how is it used?

We only collect and use essential personal data for the purposes stated above.

How do we collect your data?

We collect personal data about you whenever:

- **You** register on our websites or software.
- **You** access our websites or software.
- **You** update your registration data on our websites or software.
- **You** interact with AdOpt through social networks.
- We receive information about you from our **Users** or **Customers**, such as our technical integration partners.

To justify the collection of this data, we need your **consent**, that is, your authorization for us to collect and process your personal data. Our Privacy Policy is precisely to provide you with all the necessary information about why we need and what we do with your data so that **you** can give your consent freely, clearly, and informed, and we can keep a record of this authorization with us.

But what specific personal data do we process?

Here is a list of the types of personal data we collect, according to their respective purposes:

Personal data:

Personal data	Owner	Specific purpose
Full name	Natural person responsible for contracting AdOpt services.	- Account creation in our systems or registration for newsletters. For contact related to the account or AdOpt information.

		<ul style="list-style-type: none"> - Obtaining consent for the processing of personal data. - Direct communication with the individual during the use of the software.
E-mail	Natural person or legal entity responsible for contracting AdOpt services.	<ul style="list-style-type: none"> - Account creation in our systems or registration for newsletters. For contact related to the account or AdOpt information. - Obtaining consent for the processing of personal data. - Use for creating audiences in advertising tools.
Telephone	Natural person responsible for contracting AdOpt services.	<ul style="list-style-type: none"> - Account creation in our systems. For contact related to the account or AdOpt information.

Analytics data:

Furthermore, we inform **you** that we collect analytics data (information, metrics, statistics), but they are anonymized, meaning they cannot identify **you**. These data will be used solely for our team to understand how the software and our website(s) have been used by the user community. They include information such as: (i) visitor activities on our website and date/time of execution; (ii) access to specific tabs, pages, websites within the application and date/time of access; and (iii) errors, bugs, and malfunctions of the application, generating error messages with date/time of occurrence.

Technical data:

These are data collected when **you** access our website or application. These data have a technical or statistical nature and may include information about **your** access to our website (for example, is it your first time here?), IP address, and other technical data about your device, such as operating system, browser type, etc.

And what about cookies? 🍪

"Cookies" are internet files that temporarily store what people visit on the internet. There are other technologies that also serve to obtain usage statistics of a particular application and may allow the identification of devices, browsers, and user profiles.

Our websites use cookies and similar technologies to better understand how you use our site and personalize content. Currently, we use a third-party service (Google Analytics) to obtain this statistical and user profile information.

Therefore, these cookies and tracking technologies are subject to their respective privacy policies, not the AdOpt privacy policy.

Our company uses its own technology for the full functioning of consent management. For this purpose, we use 2 (two) cookies with a validity period of 60 days.

They are:

AdoptID - generated at the moment of access for new visitors who receive the notice - **valid for 60 days**.

AdoptConsent - generated at the moment of consent, with the description of the visitor's choice - **valid for 60 days**.

Another important information is that **AdOpt uses two types of storage in visitors' browsers**, Cookies and Local Storage, thus reinforcing the storage of consents.

What information does AdOpt record?

- IP address
- Device (e.g., Mobile Model)
- Operating System (Android, iOS, Windows)
- For information on how to delete AdOpt cookies, [this article will help you with detailed step-by-step instructions](#).

In addition, we also use third-party cookies on our websites.

Below you have a list of all those who may have access to the cookies generated in our environments, the reasons why we use their services, and their respective privacy policies.

Google Analytics - Classification: Statistical

- Visitor behavior analysis tool on our websites.
- You can access the Google Analytics Privacy Policy by clicking [here](#).

Google Tag Manager - Classification: Necessary

- Third-party tag management tool on our websites.
- It allows us to manage the blocking of third-party cookies on our site.
- **You** can access the Google Tag Manager Privacy Policy by clicking [here](#).

Google Ads - Classification: Marketing

- Advertising network used for marketing campaigns.
- **You** can access the Google Ads Privacy Policy by clicking [here](#).

Facebook - Classification: Marketing

- Advertising network used for marketing campaigns.
- **You** can access the Facebook Privacy Policy by clicking [here](#).

Hariken - DMP - Classification: Marketing

- Data management tool (cookies) for optimizing digital advertising campaigns.
- **You** can access the Hariken Privacy Policy by clicking [here](#).

Active Campaign - Classification: Functional

- Email delivery and CRM tool.
- **You** can access the Active Campaign Privacy Policy by clicking [here](#).

Freshworks - Classification: Functional

- Customer support tool, such as Chat and Help Center.
- **You** can access the Freshworks Privacy Policy by clicking [here](#).

CloudFlare - Classification: Necessary

- Website optimization, security, and performance tool.
- **You** can access the CloudFlare Privacy Policy by clicking [here](#).

Stripe - Classification: Necessary

- Payment gateway used for credit card processing, invoice management, etc.
- **You** can access the Stripe Privacy Policy by clicking [here](#).

Hotjar - Classification: Statistical

- Visitor behavior and navigation analysis service on our websites, using heatmaps.
- **You** can access the Hotjar Privacy Policy by clicking [here](#).

Semrush - Classification: Marketing

- SEO intelligence and strategy service for content production and keyword research in search engines.
- **You** can access the Semrush Privacy Policy by clicking [here](#).

And what about sensitive personal data?

AdOpt does not collect or process any sensitive personal data.

How do we handle personal data of children and adolescents?

First, we want to highlight that our services are not intended for children and adolescents, but rather for companies.

Nevertheless, we want to make it clear that **if you are under 12 years old, please ask your parents or guardian to assist you with navigating our website(s).**

Furthermore, it is important to us that **your parents or guardians are involved in the experience of our services, such as interacting with our Cookie Notices, whether they are on our own website(s) or on the websites of our Clients and Users.**

In all our Notices, at the "Opt-out" link or, at the end of this text, we provide our contact information so that your parents or guardians can also make any requests for deletion, details, or inquiries regarding any data we may have about you.

Who do we share personal data with?

Here, we want to emphasize our commitment to the privacy and protection of personal data of users of our services:

AdOpt does not sell or share information that can individually identify you with other companies, organizations, or individuals, especially sensitive data mentioned above.

However, to provide our services in the best possible way, we may share some information and personal data with third parties in the following cases:

- **AWS – Amazon Web Services**
 - Cloud server and data storage service. Whenever an account is created, it is processed and delivered through our servers hosted on AWS.
 - You can access the AWS Privacy Policy by clicking [here](#).
- **Oracle Data Cloud**
 - Cloud server and data storage service. Whenever an account is created, it is processed and delivered through our servers hosted on Oracle.
 - You can access the Oracle Privacy Policy by clicking [here](#).
- **Zapier**
 - Software integration service. For proper control and support, some data is transferred via Zapier integrations.
 - You can access the Zapier Privacy Policy by clicking [here](#).
- **Discord**
 - Chat and internal communication service for our team to work and operationalize all our internal processes.
 - You can access the Discord Privacy Policy by clicking [here](#).
- **Basecamp**
 - Task management and control service for our team to work and operationalize all our internal processes.
 - You can access the Basecamp Privacy Policy by clicking [here](#).

- **Google G Suite (Gmail, Google Drive, Calendar, Sheets, etc)**
 - Google tools for email services and a secure cloud for company documents, enabling our team to work and operationalize all our internal processes.
 - You can access the Google G Suite Privacy Policy by clicking [here](#).

How long are we gonna keep your data?

We'll hang onto your personal data until you tell us you're done with our services or don't want to get any more stuff from **AdOpt**.

You can also hit us up anytime to nix your data or stop bombarding you with emails or notifications.

Just give us a shout in any of these ways:

Shoot us an email at **dpo@goadopt.io**, or **hey@goadopt.io** and we'll sort it all out.

Hit up the **AdOpt** controller (that little ball thing) at the bottom left of our site, click it, then go to the Opt-Out option, and make your request.

Or, click the **unsubscribe link**, found at the bottom of the emails we send.

All the security measures we implement apply to your information only from the moment we receive it and as long as we retain it under our custody. The functioning and security of the device you use to access our services, as well as the networks through which data is transmitted, are not the responsibility of AdOpt.

International Data Transfer (Storage on Foreign Servers)

Here's the deal: **AdOpt** might handle **your** data in Brazil or abroad, using third parties like the ones we mentioned before in this policy.

No matter where, we'll make sure to keep things aligned with this Privacy Policy and the laws in force, safeguarding your rights about personal data protection within and outside Brazil.

So, when **you** use our services, **you're** giving us the green light. By the terms of this Privacy Policy, you're saying it's OK for us to transfer, process, store, and use your personal data, even the sensitive stuff, in other countries.

Know Your Rights!

Alright, let's break it down. We take your rights seriously, and we want to highlight that, according to the law, **you've** got the power to ask for:

- Confirmation that we're treating your data;
- Access to your personal data that we're keeping;
- Correction of any incomplete, inaccurate, or outdated data;
- Anonymization (making data anonymous, so it can't be tied back to you), blocking, or deletion of unnecessary, excessive, or data treated against what the law says;
- Withdrawing your consent and wiping your personal data, in line with the legal terms.

If you want to make any of these requests, you can drop us an email or hit up the Opt-out link in the Cookie Notice.

Just so **you** know, if you ask to anonymize **your** data or withdraw **your** consent, which means we'd have to stop handling your personal info, we won't be able to keep our direct line open with **you** anymore.

Remember, anything you need or want to ask, just shoot an email to dpo@goadopt.io or hey@goadopt.io and chat directly with our Data Protection Officer.

Regarding Updates to this Privacy Policy

Want to keep up with the latest version of our Privacy Policy? Just visit our website or head to <https://goadopt.io/politica-de-privacidade>.

We might also drop you an email about updates through notifications when **you** access our website or software, or via available contact methods (email) provided by **you**. This way, **you'll** know if we've made any updates to our Privacy Policy.

Just so **you're** aware, any updates will only apply to you 10 (ten) days after we've let **you** know about the changes.

Acceptance of the Privacy Policy

Great job making it this far!

Now that you have all the necessary information, **all you need to do is understand that by accepting our privacy policy, you declare that you have the legal capacity and give your express consent to everything presented in it.**

If you're not yet 12 (twelve) years old, we don't recommend using our services. So, don't forget to ask mom or dad for help to agree with our Privacy Policy.

We appreciate you coming this far!

For any questions or concerns, shoot us an email at **dpo@goadopt.io** or **hey@goadopt.io**, or even reach out through the chat on our website, and we'll get back to you as soon as possible!

Best regards, AdOpt!

"BRAND is a DESCRIPTION by COMPANY NAME, a legal entity under private law, registered in the National Registry of Legal Entities - EIN under the number XXXX-XX, with its headquarters at FULL ADDRESS Neighborhood, CITY/STATE, Zip Code XXXXX-X."
