Ottemo, Inc. (“ Ottemo,” “we” or “us”) values privacy. Ottemo provides a cloud-based ecommerce platform (the “Platform”), that includes web and mobile management applications. In this Privacy Policy (“Policy”), we explain how we collect, use, and disclose information that we obtain through our Platform, click [here]. Click <here> to review our Website Privacy Policy.

This Privacy Policy does not apply to how our customers collect, use and disclose the information they collect from end user via the Platform. Our customers are required to post and comply with a privacy policy of their own, and to comply any applicable laws regarding their use of personal information.

This Privacy Policy incorporates by reference the Ottemo Master Subscription Agreement.

**What Information Do We Collect?**

Our Platform provides our customers (“Customers”) with a fast, agile and scalable eCommerce solution. Through the Platform, our customers may submit, collect and manage information related to their eCommerce solution, as well as their customers and end users, including inventory and pricing information, customer details (such as registration and account information), and any other information they configure the Platform to collect or otherwise submit through the Platform (“Customer Data”).

In addition to Customer Data, we may collect certain analytics, usage and other related data via the Platform.

**How We Use Your Information**

We generally use Customer Data on behalf of and under the direction of our Customers. We may use Customer data:

* To provide our Services to Customers, to operate the Platform, to troubleshoot issues, and to provide customer support.
* To communicate with Customers, to respond to requests and inquiries, and for other customer service purposes.
* To provide analytics and reports to our Customer related to their use of the Platform.
* To aggregate and analyze cross-platform data and statistics, in order to improve our Services, respond to user desires and preferences, and for other research and analytical purposes.

**How We Share Your Information**

We share Customer Data only as follows:

* ***Customers***. Customers, generally, have access to all of their Customer Data.
* ***Service Providers***. We may disclose the information we collect from you to third party vendors, service providers, contractors or agents who perform functions on our behalf. For example, we may contract with certain vendors to host data related to the Platform.
* ***Business Transfers***. If we are acquired by or merged with another Ottemo, if substantially all of our assets are transferred to another Ottemo, or as part of a bankruptcy proceeding, we may transfer the information we have collected from you to the other Company.
* ***In Response to Legal Process***. We also may disclose the information we collect from you in order to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a court order or a subpoena.
* ***To Protect Us and Others***. We also may disclose the information we collect from you where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our Terms of Use or this Policy, or as evidence in litigation in which Ottemo is involved.
* ***Aggregate and De-Identified Information***. We may share aggregate or de-identified information with third parties that does not identify a Customer or their individual customers or end users.

**Security of Personal Information**

We have implemented precautions (e.g., access controls) to protect the information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction.

**Contact Us**

If you have questions about the privacy aspects of our Services or would like to offer praise or make a complaint, please contact us at Founders@Ottemo.io.

**Changes to this Policy**

This Policy is current as of the Effective Date set forth above. We may change this Policy from time to time, so please be sure to check back periodically. We will post any changes to this Policy, at <http://www.ottemo.io/privacy.html> . If we make any changes to this Policy that materially affect our practices with regard to the personal information we have previously collected, we will provide notice in advance of such change by emailing Customers or notifying them in another manner (e.g., such as when they log in to the Platform).