

# Catalyst Privacy Policy

---

Effective Sep 21, 2018. [Document History](#)

This Policy applies to all Playlyfe websites, products and services, and any point of contact you might have with Playlyfe. "Catalyst" and "Catalyst Services" are offered by Playlyfe.

We define the following as our "Catalyst Services":

- The Catalyst Website (<https://getcatalyst.in>)
- The Catalyst Web Application hosted on your subdomain - `your-organization.getcatalyst.in`

This document is a sister-document to our [Terms of Service](#) document. Please make sure you read both carefully before accessing or using a Catalyst Service.

## Our Commitment to Privacy

We are committed to being good citizens. We consider protecting and respecting your personal information as an essential part of that responsibility.

This Privacy Policy describes the what, how, and whys of collecting your information. To make it easy to find, we make it available on our homepage and at every point where we request personally identifiable information.

In this Privacy Policy, we sometimes refer to "you". "**You**" may be a visitor to Catalyst Website, or a user of our Catalyst Web Application. We'll do our best to clarify who we are referring to at various points in the policy.

Our Catalyst Web Application also includes the concept of an Organization Owner, or Administrator. For the rest of this document, they will collectively be referred to as **Owners**.

This Privacy Policy also describes your choices regarding how your data is used, and how you can access, update, or delete this information.

We only collect **the minimum amount** of personal information necessary to fulfill the purpose of your interaction with us; we keep it only for as long as we have valid reasons to keep it; we never sell or rent it to third parties; and we only use it as this Privacy Policy describes.

Our business model is a very traditional one: we provide products and services, and customers pay us for them. In other words, you are the customer, NOT the product.

## Who We Are

Playlyfe is company based in India. We've been around since 2014 and are bootstrapped, profitable, and aim for longevity over growth. We believe in forming long-term relationships with our customers, our employees, and our communities. It all starts with trust.

Our Indian company is Playlyfe IT Solutions Private Limited was incorporated on 23rd May 2014 and our Corporate Identity Number (CIN) is U72900KA2014PTC074598.

Catalyst is a product built and operated by Playlyfe.

## When and How We Collect Data

From the first moment you interact with Catalyst Services, we are collecting data. Sometimes you provide us with data, sometimes data about you is collected automatically. According to the GDPR, we qualify as Data Controller for some of this data and as Data Processor for others.

Here's when and how we do this:

Activity	Data You Give	Data We Collect
You browse the Catalyst Website		<ul style="list-style-type: none"><li>• Data that Identifies you</li></ul>
You request a demo of the Catalyst Web Application	<ul style="list-style-type: none"><li>• Contact Details</li></ul>	<ul style="list-style-type: none"><li>• Data that Identifies you</li></ul>
You sign up or get invited to the Catalyst Web Application	<ul style="list-style-type: none"><li>• Contact Details</li></ul>	<ul style="list-style-type: none"><li>• Data on how you use the Catalyst Web Application</li></ul>
You use the Catalyst Web Application		<ul style="list-style-type: none"><li>• Data on how you use the Catalyst Web Application</li></ul>
You chat with us for support	<ul style="list-style-type: none"><li>• Contact Details</li></ul>	<ul style="list-style-type: none"><li>• Data on how you use the Catalyst Web Application</li></ul>
You opt-in to marketing messages	<ul style="list-style-type: none"><li>• Contact Details</li></ul>	
You invite your end users to the Catalyst Web Application	<ul style="list-style-type: none"><li>• End User Contact Details</li></ul>	
You import performance data, or make performance assessments of your end users within the Catalyst Web Application	<ul style="list-style-type: none"><li>• End User Performance Data</li></ul>	

## Types of Data We Collect

Data protection law means that we can only use your data for certain reasons and where we have a legal basis to do so. Here are the reasons for which we process your data:

Data Category	Type of Data	Description	Purpose	Data Controller	Retention
Collected Data	Contact details	Your name, address, telephone number, email address	<ul style="list-style-type: none"><li>Marketing purposes (with your consent)</li><li>Improving Catalyst Services</li></ul>	Playlyfe	We store the data for 5 years, or until the party requests the data to be deleted from our storage.
	Data that identifies you	Your IP address, browser type and version, time zone setting, geolocation information about where you might be, operating system and version			
Service Data	Data on how you use the Catalyst Web Application	Your IP address, browser type and version, time zone setting, geolocation information about where you might be, operating system and version, login information and any interactions within the Catalyst Application.	<ul style="list-style-type: none"><li>Keeping Catalyst Services running</li><li>Improving Catalyst Services</li><li>Customer Support</li></ul>	Our Customers, i.e., <b>You</b>	This data is stored both by us and some of our 3rd party vendors in pseudonymized form. When you delete your Organization within Catalyst the data stored with us is deleted immediately rendering the data shared with 3rd party vendors incapable of identifying users due to the pseudonymization.
		End User Contact Details	Your end user's name, email and profile pictures		We store the data only as long you are our Customer and have a valid Catalyst subscription. When you delete your Organization

Data Category	Type of Data	Description	Purpose	Data Controller	Retention
	End User Performance Data	Your end user's performance reports, coaching feedback and any other related information that you choose to upload			within Catalyst this data is deleted immediately.

Below is a more detailed description of each purpose mentioned in the above table and the legal basis for each.

**Keeping Catalyst Services running** Managing your requests (like setting up accounts, inviting users and configuring features), login and authentication, remembering your settings, hosting and back-end infrastructure.

*Legal basis for this data usage: **Contract, Legitimate interests***

**Improving Catalyst Services** Testing and developing new features, debugging technical issues, managing landing pages, heat mapping our site, traffic optimization.

*Legal basis for this data usage: **Contract, Legitimate interests***

**Customer Support** Notifying you of any changes to our service, solving issues via live chat support, phone or email including any bug fixing.

*Legal basis for this data usage: **Contract***

**Marketing purposes (with your consent)** Sending you emails and messages about new features, products and services, and content.

*Legal basis for this data usage: **Consent***

**Here is what each of these "legal basis" mean:**

**Consent:** You have given clear consent for you to process your personal data for a specific purpose.

#### **You can always change your mind!**

If you have previously given consent to our processing your data, you can freely withdraw such consent at any time. You can do this by emailing us at [help@getcatalyst.in](mailto:help@getcatalyst.in). If you do withdraw your consent, and if we do not have another legal basis for processing your information, then we will stop processing your personal data. If we do have another legal basis for processing your information, then we may continue to do so subject to your legal rights.

**Contract:** Processing your data is necessary for a contract you have with us to use the Catalyst Web Application.

**Legitimate interests:** Processing your data is necessary for our legitimate interests or the legitimate interests of a third party, provided those interests are not outweighed by your rights and interests. These legitimate

interests are:

- gaining insights from your behaviour on Catalyst Services
- delivering, developing and improving Catalyst Services
- enabling us to enhance, customize or modify our services and communications
- determining whether marketing campaigns are effective
- enhancing data security

In each case, these legitimate interests are only valid if they are not outweighed by your rights and interests

## Your Privacy Choices and Rights

### Collected Data

You have the following choices and rights with regards to **Collected Data** for which Playlyfe is the Data Controller.

#### Your choices

- **You can choose not to provide us with personal data.** If you choose to do this, you can continue to use the Catalyst Website and browse its pages, but we will not be able to process transactions on the Catalyst Web Application without your personal data.
- **You can turn off cookies in your browser by changing its settings.** You can block cookies by activating a setting on your browser allowing you to refuse cookies. You can also delete cookies through your browser settings. If you turn off cookies, you can continue to use the Catalyst Website and browse its pages, but certain services (like Intercom) will not work effectively.
- **You can ask us not to use your data for marketing.** We will inform you (before collecting your data) if we intend to use your data for marketing and if third parties are involved. You can opt out from marketing by emailing us at [help@getcatalyst.in](mailto:help@getcatalyst.in).

#### Your rights

You can exercise your rights by sending us an email at [help@getcatalyst.in](mailto:help@getcatalyst.in).

**You have the right to access information we hold about you.** This includes the right to ask us supplementary information about:

- the categories of data we're processing
- the purposes of data processing
- the categories of third parties to whom the data may be disclosed how long the data will be stored (or the criteria used to determine that period) your other rights regarding our use of your data

We will provide you with the information within one month of your request, unless doing so would adversely affect the rights and freedoms of other (e.g. another person's confidentiality or intellectual property rights). We'll tell you if we can't meet your request for that reason.

**You have the right to make us correct any inaccurate personal data about you.**

**You can object to us using your data for profiling you or making automated decisions about you.** We may use your data to determine whether we should let you know information that might be relevant to you (for example, tailoring emails to you based on your behaviour). Otherwise, the only circumstances in which we will do this is to provide Catalyst Services to you.

**You have the right to port your data to another service.** We will give you a copy of your data in CSV or JSON so that you can provide it to another service. If you ask us and it is technically possible, we will directly transfer the data to the other service for you. We will not do so to the extent that this involves disclosing data about any other individual.

**You have the right to be 'forgotten' by us.** You can do this by asking us to erase any personal data we hold about you, if it is no longer necessary for us to hold the data for purposes of your use of Catalyst Services.

**You have the right to lodge a complaint regarding our use of your data.** Please tell us first, so we have a chance to address your concerns. If we fail in this, you can address a complaint to your local Data Protection Authority.

## Service Data

We only process **Service Data** as per our Customer's instructions. For purposes of the GDPR, we are the processor and not the controller of the Service Data. All Personal Data collected during the use of the Catalyst Web Application through a Catalyst Organization account belonging to our Customers is considered as Service Data.

If you are our Customer, then in your role as a controller, you are authorizing, on behalf of you and your authorized agents and End Users, and representing that you have the authority to provide such authorization to the processing and transfer of Personal Data in and to the United States and other countries which may have different privacy laws from your or their country of residence. We will take all steps reasonably necessary to ensure that the Service Data is treated securely.

We do not own, control or direct the use of Service Data, and in fact we are largely unaware of what information is being stored on our platform and only access such information as reasonably necessary to respond to support requests, as otherwise authorized by Customers or as required by law. Unless we explicitly agree otherwise in writing, you will not process sensitive personal data (such as health data) on our platform.

If you seek access to, or wish to correct, update, modify or delete Personal Data which is part of the Service Data and processed by us on behalf of our Customer, you should direct your query to our Customer i.e, the controller. If you are a Customer of the Catalyst Web Application and wish to raise a Request on behalf of your Users and End Users in connection with Service Data, you can send us an email at [help@getcatalyst.in](mailto:help@getcatalyst.in).

## Sub-Processors

Tech businesses often use third parties to host their applications, communicate their customers, power their emails, etc. We partner with third-parties who we believe are the best in their field at what they do.

When we do this, sometimes it is necessary for us to share your data with them in order to get these services to work well. Your data is shared only when strictly necessary and according to the safeguards and good practices detailed in this Privacy Policy. Where personal data is transferred to a third party in the United States we take steps to ensure that the organization in question has a current certification with the EU-U.S. and

Swiss-U.S. Privacy Shield Frameworks administered by the U.S. Department of Commerce's International Trade Administration (ITA).

Here are the details of our main third-party service providers, what data they collect, or we share with them, where they store the data, and why they need it:

Service Provider	Data collected or shared	Purpose	Place of Processing
Microsoft Azure ( <a href="#">privacy policy</a> )	<ul style="list-style-type: none"><li>• Data on how you use the Catalyst Web Application</li><li>• End User Contact Details</li><li>• End User Performance Data</li></ul>	This is a web hosting provider: we use it to store data you generate by using Catalyst Services securely in the cloud.	US or EU depending on where you ask us to store the data
SendGrid, Inc. ( <a href="#">privacy policy</a> )	<ul style="list-style-type: none"><li>• Contact Details</li><li>• End User Contact Details (decided by Customer)</li><li>• End User Performance Data (decided by Customer)</li></ul>	We use this service for sending, receiving and tracking emails from the Catalyst Web Application. All Service Data such as End User Contact Details and End User Performance Data which is shared as body content within Emails is controlled by our Customer.	US
Intercom, Inc. ( <a href="#">privacy policy</a> )	<ul style="list-style-type: none"><li>• Contact Details</li><li>• Cookies</li></ul>	We use this service for customer communications, user interaction and helpdesk assistance.	US

Service Provider	Data collected or shared	Purpose	Place of Processing
Sentry ( <a href="#">privacy policy</a> )	<ul style="list-style-type: none"> <li>Data on how you use the Catalyst Web Application</li> <li>Cookies</li> </ul>	Sentry is a web analytics service: we use it to track your use of the service, and debug any technical issues that may arise.	US
Mixpanel, Inc. ( <a href="#">privacy policy</a> )	<ul style="list-style-type: none"> <li>Data on how you use the Catalyst Web Application</li> <li>Cookies</li> </ul>	This is a web analytics service: we use it to track your use of the service, and prepare reports on user activity	US
Google Analytics ( <a href="#">privacy policy</a> )	<ul style="list-style-type: none"> <li>Data that identifies you</li> <li>Data on how you use the Catalyst Web Application</li> <li>Cookies</li> </ul>	Google Analytics is a web analytics service: we use it to track your use of the service, and prepare reports on user activity.	US

## Cookies

We use cookies. Unless you adjust your browser settings to refuse cookies, we (and these third parties) will issue cookies when you interact with Catalyst Services. These may be 'session' cookies, meaning they delete themselves when you leave Catalyst Services, or 'persistent' cookies which do not delete themselves and help us recognize you when you return so we can provide a tailored service.

### How can I block cookies?

You can block cookies by activating a setting on your browser allowing you to refuse the setting of cookies. You can also delete cookies through your browser settings. If you use your browser settings to disable, reject, or block cookies (including essential cookies), certain parts of our website will not function fully. In some cases, our website may not be accessible at all. Please note that where third parties use cookies we have no control over how those third parties use those cookies

### Which specific cookies do we use?



Service Provider	Key cookies	Purpose
Playlyfe IT Solutions Private Limited	<code>_csrf</code> <code>catalyst_*</code>	We use these essential website cookies. These cookies are strictly necessary to provide you with our services and to use some of our features, so you can't refuse them.
Google, Inc.	<code>_ga</code> <code>_gid</code> <code>_gat</code>	Google Analytics uses cookies allows us to see information on the activities of visitors to our website and users of our service, including page views, source and time spent on Catalyst Services. The information is de-personalized and is displayed as numbers, meaning it cannot be tracked back to individuals. This will help to protect your privacy. To opt out of being tracked by Google Analytics across all websites click <a href="#">here</a>
Intercom, Inc.	<code>intercom-id-i2zqjdqx</code> <code>intercom-lou-i2zqjdqx</code> <code>intercom-session-i2zqjdqx</code>	Intercom uses cookies to recognize particular individuals who have interacted with Intercom through Catalyst Services previously. This may be visitors to our website, our customers or their end users. You may refuse the transmission of your Information by opting out (contact them directly for more information), however please note that you will delete the opt out cookie when you delete your cookies in your browser settings. For more information on Intercom's use of cookies, please visit their <a href="#">cookie policy</a>

Service Provider	Key cookies	Purpose
Mixpanel, Inc.	<code>mp_651021a6dd0f23390c3e6bfd4bf4b926_mixpanel</code>	Mixpanel uses cookies to help analyze how visitors arrive at, and use, the Catalyst Services and provides us with statistical reports on activity. The information generated by the cookies or other technologies about your use of the Services (including IP address) is transmitted to Mixpanel and potentially stored on servers in the United States. Mixpanel will use this information to compile reports for us. You may refuse the transmission of your Information by opting out (contact them direct for more information), however please note that you will delete the opt out cookie when you delete your cookies in your browser settings.

## Data Security

To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect online.

If we become aware of a data breach that affects your personal data, we will notify you (and the appropriate national supervisory authorities) within 72 hours.

Our detailed Data Security information is [here](#).

## Who Can See My Data?

The people who you invite to your Catalyst organization and necessary permissions to access the data.

For Catalyst Services some Playlyfe employees will also have access, according to the following guidelines:

- We restrict who at Playlyfe can access customer data to only senior members of the team, and never to outside parties.
- We only access your organization in response to a customer support question, or to debug and fix an issue.
- We never make changes to anything unless explicitly requested by an Owner.
- We never share what we see with other customers, the general public, or the rest of the Playlyfe staff.
- We might give access to Indian authorities if requested in writing. We'll try not to, but we don't have the resources to fight the government. We'll also keep your Owners(s) informed as much as we can if this happens.

## Children's Privacy

Protecting the privacy of the very young is especially important. For that reason, we never collect or maintain information on Catalyst Services from those we factually know are under the age of 16, and no part of the Catalyst Services are structured to attract anyone under the age of 16. If we become aware that a child under the age of 16 has provided us with Personal Data, we will take steps to delete such information. If you become aware that a child has provided us with their personal information, please contact us at [help@getcatalyst.in](mailto:help@getcatalyst.in).

## Changes to this Privacy Policy

We may change this privacy policy from time to time. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice by adding a notice on our homepage, product login screens, or by sending you an email notification.

## Contact Us

Should you have questions or concerns about our Privacy Policy, our practices, or any of our legal documents please call us at +91 81057 92237 or send us an e-mail at [help@getcatalyst.in](mailto:help@getcatalyst.in).

**Playlyfe IT Solutions Private Limited** 3rd Floor, #758, 19th Main Rd Sector 2, HSR Layout Bengaluru, Karnataka - 560102 India

## Document History

- 2018, Sep 21: re-drafted a new privacy policy to comply with the GDPR guidelines.
- 2018, Mar 18: added subscription term & fees.
- 2017, Nov 14: created.