

SEEYOU Privacy Statement

Last updated: March 31st, 2022

THIS PRIVACY STATEMENT DESCRIBES THE PERSONAL DATA WE COLLECT AND/OR PROCESS (WHICH MAY INCLUDE COLLECTING, ORGANIZING, STRUCTURING, STORING, USING, OR DISCLOSING) TO PROVIDE PRODUCTS AND SERVICES OFFERED DIRECTLY BY SEEYOU LTD. (“SEEYOU”), INCLUDING SEEYOU’S WEBSITES AND ITS MEETINGS, WEBINARS, AND MESSAGING PLATFORM, AND SEEYOU APP MARKETPLACE (“SEEYOU PRODUCTS” OR “PRODUCTS”).

- [What Personal Data Do We Receive?](#)
 - [How Do We Use Personal Data?](#)
 - [How Do We Share Personal Data?](#)
 - [Who Can See and Share My Personal Data When I Use SEEYOU?](#)
 - [Privacy Rights and Choices](#)
 - [Children](#)
 - [How to Contact Us](#)
 - [Retention](#)
 - [European Data Protection Specific Information](#)
 - [Changes to This Privacy Statement](#)
-

What Personal Data Do We Receive?

Personal data is any information from or about an identified or identifiable person, including information that SEEYOU can associate with an individual person. We may collect, or process on behalf of our customers, the following categories of personal data when you use or interact with SEEYOU Products:

- **Account Information:** Information associated with an account that licenses SEEYOU Products, which may include administrator name, contact information, account ID, billing information, and account plan information.
- **Profile and Participant Information:** Information associated with the SEEYOU profile of a user who uses SEEYOU Products under a licensed account or that is provided by an unlicensed participant joining a meeting, which may include name, display name, picture, email address, phone number, job information, stated locale, user ID, or other information provided by the user or their account owner.
- **Contacts and Calendar Integrations:** Contact information added by accounts or their users to create contact lists on SEEYOU Products, which may include contact

information a user integrates from a third-party app. Users can also integrate their calendars from other services with their SEEYOU profile or account.

- **Settings:** Information associated with the preferences and settings on a SEEYOU account or user profile, which may include audio and video settings, recording file location, screen sharing settings, and other settings and configuration information.
- **Registration Information:** Information people provide when registering for a SEEYOU meeting, webinar or recording, which may include name and contact information, responses to registration questions, and other registration information requested by the host.
- **Device Information:** Information about the computers, phones, and other devices people use when interacting with SEEYOU Products, which may include information about the speakers, microphone, camera, OS version, hard disk ID, PC name, MAC address, IP address (which may be used to infer general location at a city or country level), device attributes (like operating system version and battery level), WiFi information, and other device information (like Bluetooth signals).
- **Meeting, Webinar, and Messaging Content and Context:** Content generated in meetings, webinars, or messages that are hosted on SEEYOU Products, which may include audio, video, in-meeting messages, chat messaging content, transcriptions, written feedback, responses to polls and Q&A, and files, as well as related context, such as invitation details, meeting or chat name, or meeting agenda. Content may contain your voice and image, depending on the account owner's settings, what you choose to share, your settings, and what you do on SEEYOU Products.
- **Product and Website Usage:** Information about how people and their devices interact with SEEYOU Products, such as: when participants join and leave a meeting; whether participants sent messages and who they message with; performance data; mouse movements, clicks, keystrokes or actions (such as mute/unmute or video on/off), and other user inputs that help SEEYOU to understand feature usage, improve product design, and suggest features; which third-party apps users add to a meeting or other Product and what information and actions the app is authorized to access and perform; use of third-party apps and the SEEYOU App Marketplace; features used (such as screen sharing, emojis, or filters); and other usage information and metrics. This also includes information about when and how people visit and interact with SEEYOU's websites, including what pages they accessed, their interaction with the website features, and whether or not they signed up for a SEEYOU Product.
- **Communications with SEEYOU:** Information about your communications with SEEYOU, including relating to support questions, your account, and other inquiries.
- **Information from Partners:** SEEYOU obtains information about account owners and their users from third-party companies, such as market data enrichment services, including information about an account owner's company size or industry, contact information, or activity of certain enterprise domains. SEEYOU may also obtain information from third-party advertising partners who deliver ads displayed on SEEYOU Products, such as whether you clicked on an ad they showed you.

How Do We Use Personal Data?

SEEYOU employees do not access meeting, webinar, or messaging content (specifically, audio, video, files, and messages) unless directed by an account owner, or as required for

legal, safety, or security reasons, as discussed below. SEEYOU uses personal data to conduct the following activities:

- **Provide SEEYOU Products and Services:** To provide Products, features, and services to account owners, their users, and those they invite to join meetings and webinars hosted on their accounts, including to customize SEEYOU Product features and recommendations for accounts or their users. SEEYOU also uses personal data, including contact information, to route invitations and messages to recipients when people send invitations and messages using SEEYOU Products. This may also include using personal data for customer support, which may include accessing audio, video, files, and messages, at the direction of the account owner or their users. We also use personal data to manage our relationship and contracts with account owners, including billing, compliance with contractual obligations, and related administration.
- **Product Research and Development:** To develop, test, and improve SEEYOU Products, including, for example, content-related features (such as background filters), and to troubleshoot products and features.
- **Marketing, Promotions, and Third-Party Advertising:** To permit SEEYOU and/or its third party marketing partners to market, advertise, and promote SEEYOU Products, features, and services, including based on your product usage, information we receive from third-party partners, or if you visit our websites, information about how and when you visit, and your interactions with them. We may also use cookies or similar technology, including from third-party advertising partners, to show you ads within SEEYOU Products about products, services, or causes from third parties. SEEYOU does NOT use meeting, webinar, or messaging content (specifically, audio, video, files, and messages) for any marketing, promotions or third-party advertising purposes.
- **Authentication, Integrity, Security, and Safety:** To authenticate accounts and activity, detect, investigate, and prevent malicious conduct or unsafe experiences, address security threats, protect public safety, and secure SEEYOU Products.
- **Communicate with You:** We use personal data (including contact information) to communicate with you about SEEYOU Products, features, and services, including product updates, your account, and changes to our policies and terms. We also use your information to respond to you when you contact us.
- **Legal Reasons:** To comply with applicable law or respond to valid legal process, including from law enforcement or government agencies, to investigate or participate in civil discovery, litigation, or other adversarial legal proceedings, and to enforce or investigate potential violations of our Terms of Service or policies.

SEEOU uses advanced tools to automatically scan content such as virtual backgrounds, profile images, and files uploaded or exchanged through chat, for the purpose of detecting and preventing violations of our terms or policies and illegal or other harmful activity, and its employees may investigate such content where required for legal, safety, or security reasons.

How Do We Share Personal Data?

SEEOU provides personal data to third parties only with consent or in one of the following circumstances (subject to your prior consent where required under applicable law):

- **Resellers:** If an account owner licensed or purchased SEEYOU Products from a third-party reseller of SEEYOU Products, the reseller may be able to access personal data and content for users, including meetings, webinars, and messages hosted by the account owner.
- **Vendors:** SEEYOU works with third-party service providers to provide, support, and improve SEEYOU Products and technical infrastructure, and for business services such as payment processing. SEEYOU may also work with third-party service providers to provide advertisements and business analytics regarding SEEYOU Products. These vendors can access personal data subject to contractual and technical requirements for protecting personal data and prohibiting them from using personal data for any purpose other than to provide services to SEEYOU or as required by law.
- **For Legal Reasons:** SEEYOU may share personal data as needed to: (1) comply with applicable law or respond to, investigate, or participate in valid legal process and proceedings, including from law enforcement or government agencies; (2) enforce or investigate potential violations of its Terms of Service or policies; (3) detect, prevent, or investigate potential fraud, abuse, or safety and security concerns, including threats to the public; (4) meet our corporate and social responsibility commitments; (5) protect our and our customers' rights and property; and (6) resolve disputes and enforce agreements.
- **Marketing, Advertising, and Analytics Partners:** SEEYOU uses third-party marketing, advertising, and analytics providers: to provide statistics and analysis about how people are using SEEYOU Products and our website; to provide advertising and marketing for SEEYOU Products, including targeted advertising based on your use of our website; and to show you third-party advertising within SEEYOU Products. These third-party partners may receive information about your activities on SEEYOU's website through third-party cookies placed on SEEYOU's website. To opt out of our use of third-party cookies that share data with these partners, visit our cookie management tool, available Cookies Settings. Where required by law, SEEYOU will first obtain your consent before engaging in the marketing or advertising activities described.
- **Corporate Affiliates:** SEEYOU shares personal information with corporate affiliates, such as SEEYOU Voice Communications, Inc., to provide integrated and consistent experiences across SEEYOU Products (such as enabling a user to integrate a SEEYOU Phone call into a meeting) to detect, investigate, and prevent fraud, abuse, and threats to public safety.
- **Change of Control:** We may share personal data with actual or prospective acquirers, their representatives and other relevant participants in, or during negotiations of, any sale, merger, acquisition, restructuring, or change in control involving all or a portion of SEEYOU's business or assets, including in connection with bankruptcy or similar proceedings.

Who Can See and Share My Personal Data When I Use SEEYOU?

When you send messages or join meetings and webinars on SEEYOU, other people and organizations, including third parties outside the meeting, webinar, or message, may be able to see content and information that you share:

- **Account Owner:** An account owner is the organization or individual that signs up for a SEEYOU account.
- **Meeting Hosts and Participants:** Hosts and other participants in a meeting may be able to see your email, display name, and profile picture.
- **Third-Party Apps and Integrations:**
 - Account owners can choose to add third-party apps to their account and the SEEYOU Products they use.
 - Third-party developers may also integrate or embed SEEYOU meetings into their website or app experiences or build versions of SEEYOU that enable access to SEEYOU Products from a third-party app.
 - Personal information shared by account owners and users with third-party apps and integrations is collected and processed in accordance with the app developers' terms and privacy policies, not SEEYOU's.

Privacy Rights and Choices

If you are in the European Economic Area (EEA), Switzerland, or the UK, please refer to the respective dedicated sections below. Otherwise, at your request, and as required by applicable law, we will:

- Inform you of what personal data we have about you that is under our control;
- Amend or correct such personal data or any previous privacy preferences you selected, or direct you to applicable tools; and/or
- Delete such personal data or direct you to applicable tools.

Children

SEEYOU does not allow children under the age of 13 to sign up for a SEEYOU account.

For educational organizations that use SEEYOU Products to provide educational services to children under 13.

How to Contact Us

If you have any privacy-related questions or comments related to this Privacy Statement, please send an email to per.kristian@seeyou.eu.

Retention

We retain personal data for as long as required to engage in the uses described in this Privacy Statement, unless a longer retention period is required by applicable law.

The criteria used to determine our retention periods include the following:

- The length of time we have an ongoing relationship with you and provide SEEYOU Products to you (for example, for as long as you have an account with us or keep using our Products);
- Whether account owners modify or their users delete information through their accounts;
- Whether we have a legal obligation to keep the data (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); or
- Whether retention is advisable in light of our legal position (such as in regard to the enforcement of our agreements, the resolution of disputes, and applicable statutes of limitations, litigation, or regulatory investigation).

European Data Protection Specific Information

Data Subjects Rights

If you are in the EEA, Switzerland, or the UK, your rights in relation to your personal data processed by us as a controller specifically include:

- **Right of access and/or portability:** You have the right to access any personal data that we hold about you and, in some circumstances, have that data provided to you so that you can provide or “port” that data to another provider;
- **Right of erasure:** In certain circumstances, you have the right to the erasure of personal data that we hold about you (for example, if it is no longer necessary for the purposes for which it was originally collected);
- **Right to object to processing:** In certain circumstances, you have the right to request that we stop processing your personal data and/or stop sending you marketing communications;
- **Right to rectification:** You have the right to require us to correct any inaccurate or incomplete personal data;
- **Right to restrict processing:** You have the right to request that we restrict processing of your personal data in certain circumstances (for example, where you believe that the personal data we hold about you is not accurate or lawfully held).

To exercise your rights, please send an email to per.kristian@seeyou.eu. If you have any other questions about our use of your personal data, please send a request at the contact details specified in the How to Contact Us section of this Privacy Statement. Please note that we may request you to provide us with additional information in order to confirm your identity and ensure that you are entitled to access the relevant personal data.

You also have the right to lodge a complaint to a data protection authority. For more information, please contact your local data protection authority.

Legal Basis for Processing Personal Data

We only use your information in a lawful, transparent, and fair manner. Depending on the specific personal data concerned and the factual context, when SEEYOU processes personal data as a controller for individuals in regions such as the EEA, Switzerland, and the UK, we rely on the following legal bases as applicable in your jurisdiction:

- **As necessary for our contract:** When we enter into a contract directly with you, we process your personal data on the basis of our contract in order to prepare and enter into the contract, as well as to perform and manage our contract (i.e., providing SEEYOU Products, features and services to account owners, their users, and those they invite to join meetings and webinars hosted on their accounts, and manage our relationship and contract, including billing, compliance with contractual obligations, and related administration). If we do not process your personal data for these purposes, we may not be able to provide you with all Products, features, and services;
- **Consistent with specific revocable consents:** We rely on your prior consent in order to utilize cookies to engage advertising and analytics partners to deliver tailored advertising and analysis of our website usage. You have the right to withdraw your consent at any time by visiting our cookie management tool, available Cookies Settings;
- **As necessary to comply with our legal obligations:** We process your personal data to comply with the legal obligations to which we are subject for the purposes of compliance with EEA laws, regulations, codes of practice, guidelines, or rules applicable to us, and for responses to requests from, and other communications with, competent EEA public, governmental, judicial, or other regulatory authorities. This includes detecting, investigating, preventing, and stopping fraudulent, harmful, unauthorized, or illegal activity (“fraud and abuse detection”) and compliance with privacy laws;
- **To protect your vital interests or those of others:** We process certain personal data in order to protect vital interests for the purpose of detecting and preventing illicit activities that impact vital interests and public safety, including child sexual abuse material; and
- **As necessary for our (or others’) legitimate interests, unless those interests are overridden by your interests or fundamental rights and freedoms, which require protection of personal data:** We process your personal data based on such legitimate interests to (i) enter and perform the contract with the account owner and/or reseller providing you with the Products (which includes billing, compliance with contractual obligations, and related administration and support); (ii) develop, test, and improve our Products and troubleshoot products and features; (iii) ensure authentication, integrity, security, and safety of accounts, activity, and Products, including detect and prevent malicious conduct and violations of our terms and policies, prevent or investigate bad or unsafe experiences, and address security threats; (iv) send marketing communications, advertising, and promotions related to the Products; and (v) comply with non-EEA laws, regulations, codes of practice, guidelines, or rules applicable to us and respond to requests from, and other communications with, competent non-EEA public, governmental, judicial, or other regulatory authorities, as well as meet our corporate and social responsibility commitments, protect our rights and property and the ones of our customers, resolve disputes, and enforce agreements.

International Data Transfers

SEEYOU operates globally, which means personal data may be transferred, stored (for example, in a data center), and processed outside of the country or region where it was initially collected where SEEYOU or its service providers have customers or facilities – including in countries where meeting participants or account owners hosting meetings or webinars that you participate in or receiving messages that you send are based.

Therefore, by using SEEYOU Products or providing personal data for any of the purposes stated above, you acknowledge that your personal data may be transferred to or stored in other countries outside of the EEA, Switzerland, and the UK. Such countries may have data protection rules that are different and less protective than those of your country.

We protect your personal data in accordance with this Privacy Statement wherever it is processed and take appropriate contractual or other steps to protect it under applicable laws. Where personal data of users in the EEA, Switzerland, or the UK is being transferred to a recipient located in a country outside the EEA, Switzerland, or the UK which has not been recognized as having an adequate level of data protection, we ensure that the transfer is governed by the European Commission's standard contractual clauses. Please contact us if you would like further information in that respect.

Changes to This Privacy Statement

We may update this Privacy Statement periodically to account for changes in our collection and/or processing of personal data, and will post the updated Privacy Statement on our website, with a "Last Updated" date at the top. If we make material changes to this Privacy Statement, we will notify you and provide you an opportunity to review before you choose to continue using our Products.