

# CiraSync Privacy Policy

Last Updated on April 17, 2019

This privacy policy (the “Policy”) describes the treatment of information provided or collected on the <https://cirasync.com> website (the “Website”). The purpose of this Policy is to describe how the Website collects, shares and secures information provided by you. Therefore, before you provide Cira Apps Limited (the “Company” or “We”) with any personal information, you should read through this Policy in its entirety and understand its terms. We may update the Policy from time to time, so please check in occasionally. Our goal is to provide a Company Policy that is transparent in how we handle your information.

## 01. Information we collect

## 02. How we collect your information

## 03. What we do with your information

## 04. Sharing your information

## 05. Your controls and choices

## 06. Security measures

## 07. How we communicate with you

## 08. Children

## 09. Changes to this policy

## 10. Notice to California residents

## 11. California do not track disclosures

## 01. Information we collect

At the Website, you may choose to provide the Company with information about yourself which is personally identifiable information. The term personally identifiable information means information that is collected in connection with your name, such as your address, email, phone number, credit card information, and shipment information (“Personal Information”). Your use of the Website may also entail you providing information that is not Personal Information, meaning that such information is not connected to your name and is, therefore, anonymous information which does not identify and cannot be reasonably used to identify an individual Website user. It is your choice whether to provide us with Personal Information and the provision of such Personal Information is not required when visiting the Website. Therefore, if you provide us with Personal Information, such as by asking to be put on our mailing list, we may contact you from time to time.

Some examples of the types of information we collect are:

- Billing: we collect Personal Information related to transactions and customer accounts. This Personal Information is stored in two places for billing purposes:
  - Authorize.NET is a [PCI compliant](https://www.authorize.net/company/privacy/) credit card merchant gateway which may store your credit card information. This information is necessary to process refunds. You can read more about Authorize.Net on their website at: <https://www.authorize.net/company/privacy/>.
  - Intuit, a software company that manufactures QuickBooks. You can read more about Intuit’s privacy policy on their website: <https://security.intuit.com/privacy/>.
- We use OAuth to allow customers to log in without sharing their passwords. You can read more information about OAuth on its website at <https://oauth.net>. Logins are verified against Azure AD.

## 02. How we collect your information

- We collect Personal Information from you when you request products, services or information from us, register with us, participate in public forums or other activities on our Website and any platforms which permit us to interact directly with you, respond to customer surveys, or otherwise interact with us. Please keep in mind that when you provide any information to us on a third-party site or platform (e.g., Facebook), that any information you provide may be separately collected by the third-party site or platform. The Personal Information we collect is covered by this Policy and the information the third-party site or platform collects is subject to the third-party site or platform's privacy practices and, therefore, you should familiarize yourself with any applicable third-party privacy policy as needed.
- We do not require the use of cookies. We do not collect or store any data from our site visitors, except when necessary to provide contracted services or to respond to a request for contact. If you submit your Personal Information to us via a form (either to request that we contact you or on landing pages where we offer an asset for download), we may use your contact information to send you promotional emails. You are free to unsubscribe from our communications at any time, and we will respect your request.
- Advertisers and third parties may also collect information about your activity on our Website and on third-party sites and applications using tracking technologies. Tracking data collected by these advertisers and third parties is used to decide which ads you see both on our Website and on third-party sites and applications but does not identify you personally and is not associated with your registration account.
- As you enter our Website, we capture and retain the IP address of the device you are using, such as a personal computer or a mobile device.

## 03. What we do with your information

The Company may use information provided by you on the Website for the following purposes:

- Provide you with the products and services you request.
- Communicate with you about your account or transactions with us and send you information about features on our Website or changes to our policies.
- Consistent with local law and choices and controls that may be available to you:
  - Send you offers and promotions for our products and services or third-party products and services.
  - Personalize content and experiences.
  - Provide you with advertising based on your activity on our Website and on third-party sites and applications.
- Optimize or improve our products, services and operations. CiraSync is a cloud-hosted service that syncs Office 365 contacts and calendars to smartphones. It resides in the Microsoft Azure Cloud and is tightly integrated with Office 365. For more information about how Microsoft safeguards data, visit <https://azure.microsoft.com/en-us/support/trust-center/>. CiraSync does not move customer data via the Internet. Each server is protected with its own firewall. Although CiraSync caches and logs some data to optimize the performance of our service, the cache or data logging persists for up to 30 days after which it is purged.
- The Company or Website may use your information to create and/or calculate aggregated statistical information for purposes of improving our services. This data does not contain Personal Information, such as name or email address. An example might be location data or information that might be used to improve our user experience.
- Detect, investigate, and prevent activities that may violate our policies or be illegal.

## 04. Sharing your information

Personal Information about our customers is important to us, and we do not share or sell this Personal Information to others. We share customer Personal Information only as set forth below and with subsidiaries that the Company controls or a parent company of and that are either subject to this Policy or that follow practices that are at least as restrictive as those described in this Policy.

- **Internal Process/Employees.** Company allows a very limited number of employees to have access to your Personal Information. These employees are trained on our security practices and are deeply committed to maintaining your privacy. They are authorized to access your account information on an as-needed basis to provide technical or billing support, or at your request.
- **Business Transactions and Partner Companies.** Company will never disclose or sell your Personal Information to any third parties, including partners. We will never use client or user information for any purposes other than to provide the contracted services or to keep you apprised of promotions. You are free to unsubscribe from promotional emails at any time. However, opting out of certain free services may also reduce functionality.
- **Exceptions to Sharing Information.** Exceptions to sharing your Personal Information include when the customer provides direct permission, or when it is required by the law or with legal processes.

## 05. Your controls and choices

We provide you the ability to exercise certain controls and choices regarding our collection, use, and sharing of your Personal Information. In accordance with local law, your controls and choices may include:

- You may correct, update and delete your registration account.
- You may change your choices for subscriptions, newsletters and alerts.
- You may choose whether to receive from offers from us and promotions for our products.
- You may choose whether we share your Personal Information with other companies, so they can you offers and promotions about their products and services.
- You may choose whether to receive targeted advertising from many ad networks, data exchanges, marketing analytics, and other service providers.
- You may request access to the Personal Information we hold about you and that we amend or delete such information.

You may exercise your controls and choices, request access to your Personal Information, or ask questions about your Personal Information by contacting us at [202-747-0888](tel:202-747-0888) or use our [Contact Us](#) form on our website, by updating your user profile, or by following instructions provided in communications sent to you. Please be aware that if you do not allow us to collect Personal Information from you, we may not be able to deliver certain products to you and some of our services may not be able to take account of your interests and preferences.

## 06. Security measures

The security, integrity, and confidentiality of your Personal Information is extremely important to us. We take all reasonable and appropriate measures to secure your Personal Information once we receive it and to help prevent it from being disclosed to individuals who are not described in this Policy.

The CiraSync service is physically separate from all other assets belonging to the company, such as our website, that may have less-stringent privacy requirements. Please be aware that, despite our best efforts, no security measures are perfect or impenetrable and, therefore, we cannot guarantee that Personal Information will remain secure in all circumstances.

## 07. How we communicate with you

If you have any questions about our Policy, you can contact us at [202-747-0888](tel:202-747-0888) or use our [Contact Us](#) form on our website. If we need, or are required, to contact you concerning any event that involves your Personal Information, we may do so by email, telephone or mail.

## 08. Children

The Company is committed to protecting the online privacy of children and making the internet safe. We do not provide products and services to children, or knowingly collect or solicit Personal Information from children under 13 years of age. Any communication we get that is identified as being from a child under 13 will not be kept by the Company. We encourage parents or guardians of children under 13 to regularly check and monitor their children's use of email and other activities online.

## 09. Changes to this policy

Your use of our Website, including any dispute concerning privacy, is subject to this privacy policy and the applicable Website Terms and Conditions. BY USING OUR WEBSITE, YOU ARE ACCEPTING THE PRACTICES SET OUT IN THIS PRIVACY POLICY AND THE APPLICABLE WEBSITE TERMS AND CONDITIONS. We reserve the right to modify this Policy at any time by posting the changes on this page. Please check the effective date at the top of this page to determine if the Policy has been modified since you last reviewed it. Your continued use of any portion of our Website following posting of the updated Policy will constitute your acceptance of the changes.

## 10. Notice to California residents

If you are a California resident, California Civil Code Section 1798.83 permits you to request a notice regarding the disclosure of your Personal Information by the Company to partners for the partners' direct marketing purpose. If you are a California resident and would like a copy of this notice, please contact us at [202-747-0888](tel:202-747-0888) or use our [Contact Us](#) form on our website.

## 11. California do not track disclosures

We do not track our users and visitors over time and across third party websites to provide targeted advertising. Consequently, we do not respond to Do Not Track (DNT) signals. Other third-party websites may keep track of your browsing activities when they provide you with content, which enables them to customize what they present to you on their websites.