

PERSONAL DATA POLICY – EEA

Version 3.0 August 13, 2021

The Personal data Policy concerning the processing of personal data and information on effective requirements for protection of personal data.

[DOWNLOAD IN PDF](#) 54 KB

Who we are?

Mindbox. Cloud B.V. (“Mindbox”) is a technology-driven company offering our marketing automation platform to various e-commerce and retail customers.

You may find our contacts [here](#).

If you have a question concerning the processing of your personal data, you may contact our Data Protection Officer any time at dpo@mindbox.cloud.

General provisions & Services

This Personal Data Policy (“Policy”) is applicable to the processing of personal data of the data subjects located in the EEA by Mindbox in respect of the following: [Mindbox.cloud](#) Website, Customer Data Platform, Multi-Channel Campaigns, Loyalty and Promotions, Support and constant improvement and all other future services to be delivered by Mindbox to its Customers inside the EEA (“Services”).

For your convenience, our Policy is divided into the following sections

What data, for what purposes, how long, and based on what grounds we process as a Controller?

What data we process as a Processor of our Customers (Controllers)?

Who do we share your data with?

Security of personal data

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What data, for what purposes, how long, and based on what grounds we process as a Controller?

Purpose of Processing	Data Subjects: Categories of Data	Storage Period	Legal Basis
to offer access to a demo of the Mindbox service	Our website visitors and employees of our potential customers:	until the termination of a contract	processing is necessary in order to take steps at your request prior to entering into a contract with us

	name, phone number, email address, website address or company name of the customer, position of the customer's employee / customer		
to negotiate and enter into a contract with our customers	Customers representatives: name, phone number, email address, position, company (customer) name, proof of the authority of the person to act on behalf of the customer	5 years after the termination of a contract	processing is necessary for the performance of a contract to which you are party
to fulfill our obligations to you under the contract with our customers	Employees of our customers: name, email address, phone number, login (may not match the email address), information that you provide about yourself (in the comments field), registration date, level of your access rights, data you enter about yourself in the support chat, logs of your actions on our platform	until the termination of a contract	
to send direct email marketing communications about our service	Subscribers to our newsletter: name, email address	until you withdraw your consent or until the end of campaign whichever happened earlier	your consent to receive our monthly newsletter You may withdraw your consent at any time by clicking the "unsubscribe" link in the email communications we send to you
to better understand your preferences, to help you navigate our website, to personalize and provide a more convenient experience to you, to analyze	Our website visitors: IP-address, GEO (country or town), OS type and version, browser type and version, type of device and its display resolution,	14 months or until you withdraw your consent whichever happened earlier	your consent to store cookies in your browser You may withdraw your consent at any time by clicking the managing cookie button

which pages you visit, and to measure advertising and promotional effectiveness	traffic source for the visitor, OS and browser language, which buttons are being clicked and what pages are being opened		Please also read our Cookie Policy .
to publish your quotes on our website after we have provided our Services	Customers representatives: name, company name, position, photo	until you withdraw your consent or until the purpose of such processing is met whichever happened earlier	your consent to publish a quote on our website You may withdraw your consent at any time by contacting at dpo@mindbox.cloud

What data we process as a Processor of our Customers (Controllers)?

Mindbox processes personal data on behalf of its Customers inside the EEA in respect of the Services and therefore acts as a processor in the sense of the GDPR (“Processor”).

Mindbox’ Customers determine the purposes and means of the processing of personal data in respect of the Services inside the EEA and therefore act as a controller in the sense of the GDPR (“Controller”).

The processing of personal data by Mindbox on behalf of its Customers is only allowed in respect of providing the Services inside the EEA.

Mindbox is not allowed to process personal data for its own purposes and means. Should Mindbox nevertheless process personal data for its

own purposes and means in respect of the Services inside the EEA, then in such case only, Mindbox acts as a controller in the sense of the GDPR.

We usually process the following personal data on behalf of our Customers in respect of the Services: name, date of birth, email address, residential address, phone number, contact details of relatives and friends, IP-addresses, device data from which the website is viewed, mobile application, device data, hash ID, marital status.

The specific categories of data are determined by our Customers instructions. Our obligations are explicitly explained in our [Personal Data Processing Agreement](#).

Who do we share your data with?

Acting as a Controller we share your data with the following processors:

Purpose of Processing	Processors, their Location and the Link to Privacy Policy / Website if applicable	Safeguards for restricted transfers (outside the EEA and 'adequate' jurisdictions)
to offer access to a demo of the Mindbox service	Intensa LLC (Russia), Website	We use Standard Contractual Clauses to ensure that your data is properly protected
	Pipedrive OÜ (the EU), Privacy Policy	We transfer your data according to the Data Processing Addendum between us and Pipedrive

	Aut O'Mattic A8C Ireland Ltd. (d.b.a. Wordpress.com) (the EU), Privacy Policy	We transfer your data according to the Data Processing Addendum between us and Wordpress
	Google LLC (the USA), Privacy Policy	We transfer your data according to the Model Contract Clauses between us and Google
to negotiate and enter into a contract with our customers	Pipedrive OÜ (the EU), Privacy Policy	We transfer your data according to the Data Processing Addendum between us and Pipedrive
	Google LLC (the USA), Privacy Policy	We transfer your data according to the Model Contract Clauses between us and Google
to fulfill our obligations to you under the contract with our customers	Intercom R&D Unlimited Company (Ireland), Intercom, Inc. (the USA); Intercom's group companies, Privacy Policy	We transfer your data according to the Data Processing Agreement between us and Intercom
to send direct email marketing communications about our service	None	Not applicable
to better understand your preferences, to help you navigate our website, to personalize and provide a more convenient experience to you, to analyze which pages you visit, and to measure advertising and promotional effectiveness	Google LLC (the USA), Privacy Policy	We transfer your data according to the Google Ads Data Processing Terms between us and Google
	Intensa LLC (Russia), Website	We use Standard Contractual Clauses to ensure that your data is properly protected
	Business Analytica LLC (Russia)	
	Facebook Ireland Limited (the EU), Privacy Policy	We transfer your data according to the Facebook EU Data Transfer Addendum between us and Facebook
	Yandex LLC (Russia), Privacy Policy	We transfer your data according to the Yandex.Metrica Data Processing Agreement

		(DPA) between us and Yandex Oy (Yandex LLC representative in the EEA)
to publish your quotes on our website after we have provided our Services	Aut O'Mattic A8C Ireland Ltd. (d.b.a. Wordpress.com) (the EU), Privacy Policy	We transfer your data according to the Data Processing Addendum between us and Wordpress
	Intensa LLC (Russia), Website	We use Standard Contractual Clauses to ensure that your data is properly protected

Acting as a Processor we share the data provided by our Customers with the following sub-processors:

Purposes of sub-processing	Processors, their Location and the Link to Privacy Policy / Website if applicable	Safeguards for restricted transfers (outside the EEA and 'adequate' jurisdictions)
Hosting services	Microsoft Corporation (the USA),	We transfer your data according to the Data Protection Addendum between us and Microsoft
Integrated service aimed to raise our conversion	Popmechanic LLC (Russia), Privacy Policy	We use Standard Contractual Clauses to ensure that your data is properly protected
Hosting services (backup)	Selectel LLC (Russia), Data Processing and Protection Policy	
Hosting services (backup)	DataLine LLC, Privacy Policy	

Mindbox shall not disclose personal data to third parties or distribute it without the instruction of the Customer, unless otherwise stipulated by applicable legislation. Mindbox shall not conduct the cross-border transfer of personal data, unless agreed between Mindbox and its Customers or stipulated by applicable legislation.

Security of personal data

We are ensuring the confidentiality of the processed personal data on behalf our Customers, under the procedure provided by applicable legislation. Protection of personal data is supported by the implementation of legal, organisational and technical measures necessary and sufficient to ensure that the requirements of the applicable data protection legislation are met.

Automated decisions

We do not make any automated decisions about you that would result in legal or other similarly significant effects on you.

Your rights

You have the following rights under the GDPR with respect to personal data: right to information, right to access, right to rectification, right to withdraw consent, right to object against processing for specific purposes (such as direct marketing), right to object to automated processing, right to be forgotten and right for data portability (copy of personal data in a commonly used machine-readable format).

You also have the right to opt-out of our emails at any time if we process your data based on your consent. You can exercise this right by clicking on the “unsubscribe” link in the e-mail messages we send.

You may also exercise the mentioned rights by contacting us via email dpo@mindbox.cloud.

You also have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work, or where an alleged infringement of the GDPR has taken place.

When we process the data under the instruction of our Customers data subjects need to claim and exercise their rights at our Customers. In case you wish to invoke your rights at us, then you can use dpo@mindbox.cloud, in which case we shall send the request to the applicable Customer who is responsible for proper settlement of the request.

Changes to this Policy

We regularly update this Policy in case there are significant changes in the way we process your personal data.

You will receive a notification prior to such significant changes become effective by email if you provided us with your email-address or by pop-up notice on our [website](#).