

## ShopBooster - PRIVACY POLICY

ShopBooster ("ShopBooster", "we", "us", "our") provides a reviews management platform (the "Platform") to merchants who use [Shopify](#) to operate and enhance their e-commerce websites (the "Merchants"). This Privacy Policy (the "Policy") describes how we collect and use your personal data through our Platform. It also describes the rights and options available to you with respect to your personal information.

Please note that this Policy covers the Platform's privacy practices in general matters. The Merchant has an additional privacy policy explaining its own specific privacy practices related to your personal data (the "Merchant's Policy"). You should also read the Merchant's Policy.

### PERSONAL DATA WE PROCESS

**We process information about your purchases at the Merchant's website.**

Once you have completed the purchase on the Merchant's website, we will receive and process the following information regarding your purchases: email address, full name, purchase amount, purchase date, the item you purchased and your address ("Transaction Information").

**We will also collect your reviews on the Merchant's website.**

If you choose to submit a review on the Merchant's website, we will also collect any information you choose to provide within such review, including: photos, rating, review text, comments to the review and your responses to other questions that the Merchant presents in the submission form.

**We also collect analytical information about your use of the Platform.**

When you use the Platform we will collect statistical and analytical information about your use of the Platform and/or the Merchant's website, including: IP address from which you accessed the Platform, time and date of access, type of browser used, language use, links clicked, and actions taken while using the Platform ("Analytical Information").

*The overall personal data outlined above will be referred to as the "Information".*

### SOURCE OF PERSONAL DATA

We do not collect the Information we disclosed above only by ourselves. We obtain some of it from the following sources ("Vendors"):

- **Shopify, Inc.** Shopify's privacy policy is available [here](#).
- **Google Analytics (Google)**; Google's privacy policy is available [here](#).
- **Mouseflow**, Mouseflow's privacy policy is available [here](#).

## HOW WE USE PERSONAL DATA

**We use your Information to provide the Platform and our services.**

We use your Information on behalf of the Merchant, in order to provide the Platform

*The legal basis under EU law for processing and collecting the Information is the Merchant's legitimate interests in operating its e-commerce site.*

**Subject to your consent to the Merchant, we process your Information to allow the Merchant email you an invitation to submit a review for products you purchased.**

Subject to your consent to the Merchant, we process your Information to allow Merchants to send you email communications relating to reviews, such as asking you to submit a review for products you purchased, informing you of a response to a review, etc.

**You may opt-out from Merchant marketing emails**

You may 'opt-out' of using your Information for promotional communications at any time by clicking the "Unsubscribe" link at the bottom of any email we send or by sending an email to our support service at: [support@shopbooster.co](mailto:support@shopbooster.co).

*The legal basis under EU law for collecting and processing your Information for email communications is your explicit consent to the Merchant.*

**We and the Merchant will publicly display your review on the web.**

We and the Merchant will publicly display your review on Internet websites and social networks.

*The legal basis under EU law for publicly posting your reviews is the fulfillment of the review service you requested by submitting your review.*

## WHEN AND HOW WE SHARE PERSONAL DATA WITH OTHERS

*We will not share your information with third-parties, except in the events listed below or when you provide us your explicit and informed consent*

**We share your Information with the Merchant to which you submitted the review**

We will share your Information with the Merchant to which you submitted the review. The Merchant will use the information according to its own policies.

**We share your Information with the service providers who assist us in operating our business and the Platform**

We will share your Information with our service providers who assist us to operate our Platform. Our service providers are authorized to use your Information only as necessary to provide us with their services and not for their own purposes. We do not sell your Information to third parties.

**We may share your Information when you violate the terms of your engagement with ShopBooster**

If you have breached the terms of use of the Platform, this Policy or any other agreement you have with ShopBooster, abused your rights to use the Platform, or violated any applicable law - Your Information will be shared

with third parties (such as legal counsels and advisors), who handle the matter on our behalf, or with the competent authorities.

**We may share your Information if we are legally required.**

If we are bound to disclose your information by a judicial order or by a governmental or regulatory authority acting within its legal authority, we will comply and share the Information.

**We may share your Information if we change ShopBooster's business structure.**

If we organize the operation of our company within a different framework, or through another legal structure or entity (such as due to a merger or acquisition) - we will share your Information to enable the structural change. However, the receiving party will be bound by this Policy.

## SECURITY AND DATA RETENTION

**How long will we retain your Information.**

We retain your Transaction Information for one (1) year, unless you submitted a review through our Platform. If you submitted a review, we will retain your Information as long as we need it for the purposes for which it was obtained or until you ask to delete it. If you ask us to delete the Information, we may still have to retain it to comply with our legal obligations, resolve disputes and enforce our agreements.

**We implement measures to secure your Information**

We implement measures to reduce the risks of damage, loss of information and unauthorized access or use of information. However, these measures do not provide absolute information security. Therefore, although efforts are made to secure your personal information, it is not guaranteed, and you cannot expect that the Service will be immune from information security risks.

## **INTERNATIONAL DATA TRANSFERS**

**We will transfer your Information to third countries only in accordance with applicable data protection laws.**

We are based in Serbia. The Information we collect from you on behalf of the Merchant will be processed in Israel, which is recognized by the European Union ("EU") as having adequate protection for personal data. It will also be processed in Germany, by our cloud service provider, Hetzner, LLC, which is Privacy-Shield certified.

We only transfer your Information from within the EU to other jurisdictions if they have been deemed to have an adequate level of data protection by the EU, or as otherwise permitted by the applicable data protection laws.

## **YOUR RIGHTS**

**If you are in the EU, you have the right to access, update or delete your Information and obtain a copy of your**

If you are in the EU, you may ask the Merchant to exercise your rights to access the personal information about you that we store on our systems, and have the Merchant update, correct or delete it. You are also entitled to obtain your Information (excluding data obtained from other sources)

**Information. Contact the Merchant to do so.**

in a structured, commonly used and machine-readable format, and have the right to transmit those data to another data controller. If you wish to exercise any of these rights, contact the Merchant directly.

**You have a right to submit a complaint to the relevant supervisory data protection authority.**

If you are in the EU, you can lodge a complaint to the supervisory authority under the General data Protection Regulations ("GDPR"), in particular in the Member State of your residence, place of work or where the alleged infringement of the GDPR occurred.

## **MINORS**

**You must be at least 13 years of age to use the Platform.**

The Platform are not intended for minors under the age of 13. IF YOU ARE UNDER THE AGE OF 13 YOU MAY NOT USE THE PLATFORM.

## **CHANGES TO THIS PRIVACY POLICY**

**If we change this Policy, we will notify you in advance.**

From time to time, we may change this Policy. We will post a notice of such changes through the Platform. The latest version of the Policy will always be accessible on the Platform.

## **DATA CONTROLLER AND DATA PROCESSOR**

**We are the data processor on behalf of the Merchant, who is the data controller.**

The Merchant is the data controller of your personal data on the Platform. It determines the purposes and means of processing your data.

You can review the Merchant's contact information in the Merchant's Policy. We are the data processor of your personal data on the Platform, processing the data on behalf of the Merchant.