

# POSH PRIVACY POLICY

Last Updated: *February 18, 2019*

## **Introduction**

This privacy policy will help you understand what information we collect and use at Posh, and the choices you have associated with that information. When we refer to “Posh,” “we,” “our,” or “us” in this policy, we are referring to Posh Technologies Inc. and its subsidiaries and affiliates, which provides the Services to you. The “Services” refers to the applications and services provided by Posh. Posh may, from time to time, introduce new products and services. To the extent that these new products and services affect this policy, we will notify you as described in Section 8 below. This privacy policy covers all Services, as defined in our [ToS](#). The use of information collected through our service shall be limited to the purpose of providing the services for our customers and as specified herein.

If you have any questions about this privacy policy or our practices, please contact [hello@posh.tech](mailto:hello@posh.tech).

## **1. Information We Collect and Receive**

We collect different types of information to provide Services to you, including:

**Customer Account and Registration Data:** This includes information provided by you to create your account with us or register and may include: first and last name, billing information, a password and a valid email address.

### **Service Data:**

When you use Posh Services, we receive information generated through the use of the Service, either entered by you or others who use the Services with you or from the Service infrastructure itself. We may also collect usage and log data about how the services are accessed and used, including information about the device you are using the Services on, IP addresses, location information, language settings, what operating system you are using, unique device identifiers and other diagnostic data to help us support the Services.

**Third Party Data:** We may receive information about you from other sources, including publicly available databases or third parties from whom we have purchased data, and combine this data with information we already have about you. We may also receive information from other affiliated companies that are a part of our corporate group. This helps us to update, expand and analyze our records, identify new prospects for marketing, and provide products and services that may be of interest to you.

**Location Information:** We collect your location-based information for the purpose of providing and supporting the service, fraud prevention, and security monitoring. You may opt-out of the collection and use of this information, you may do so by turning location information off on your device.

**Device Information:** When you use our Services, we automatically collect information on the type of device you use, operating system version, and the device identifier.

## **2. How We Use the Information We Collect and Receive**

Posh may access (including, with your consent, limited data analysis, viewing, or listening) and use the data we collect as necessary (a) to improve, enhance, provide and maintain the Services; (b) address and respond to service, security, and customer support issues; (c) to detect, prevent, or otherwise address fraud, security, unlawful, technical, or related issues; (d) as required by law; (e) to fulfill our contracts; (f) to provide analysis or valuable information back to our Customers and users.

Some specific examples of how we use the information:

- Creation and administration of your account
- Sending order confirmations
- Improve the usage of the services you have ordered
- Assess your business needs to determine corresponding products you may be interested in.
- Sending you product updates, marketing communication, and service information
- Responding to customer questions and support requests
- Conducting research and analysis
- Displaying content based on your interests
- Provide you information about your use of the services and benchmarks, insights and suggestions for improvements Analyzing data, including through automated systems and machine learning to improve our services and your experience
- Market services of our third-party business partners

Posh also collects and stores information to fulfill our obligation to our customers and provide the Services. Posh will retain your information as long as your account with us is active, to comply with our legal obligations, to resolve disputes, and enforce our agreements.

If you wish to cancel your account or for us to stop providing you services, or if we hold personal information about you and you want it to be removed from our database or inactivated, please reach out to us at [hello@posh.tech](mailto:hello@posh.tech).

## **3. Information Sharing**

Providing for your privacy is important to us. We do not share your personal information with third parties except as described in this privacy policy. We may share your personal information

with (a) third party service providers; (b) business partners; (c) our affiliated companies and (d) as needed for legal purposes. Third party service providers have access to personal information strictly as needed to perform their functions and they must process the personal information in accordance with this Privacy Policy.

Examples of how we may share information with service providers include:

- Fulfillment of orders and provision of services
- Payment processing
- Fraud prevention
- Customer support
- Sending marketing materials
- Conducting research and analysis
- Providing infrastructure and services

We may also disclose your personal information to any third party with your prior consent.

#### **4. Communications**

Posh may need to communicate with you for various reasons, including:

- Responding to questions and requests. If you contact us with a problem or question, we will use your information to respond.
- Sending you Service and administrative emails and messages. We may contact you to inform you about changes in our Services, our Service offerings, and important Service-related notices, such as billing, security and fraud notices. These emails and messages are considered a necessary part of the Services and you may not opt-out of these.
- Sending emails about new products or other news about Posh that we think you'd like to hear about either from us or from our business partners. You can opt out of these types of messages at any time by clicking the unsubscribe link at the bottom of each communication.
- Conducting surveys. We may use the information gathered in the surveys to enhance and personalize our products, services, and websites.
- Offering referral programs and incentives, which allow you to utilize email, text, or URL links that you can share with friends or colleagues.

#### **5. Accessing Your Data**

You may always review, update, modify or change personal information within your account. Upon request, Posh will provide you with information about whether we hold, or process on behalf of a third party, any of your personal information. Please contact us at [hello@posh.tech](mailto:hello@posh.tech) if you need assistance in reviewing your information. Posh will respond to your access request to review the information we have on file for you within a reasonable time.

We also collect information on behalf of our customers, to provide services, and we might not have a direct relationship with those whose personal data is processed. If you are a customer or end-user of one of our customers, please contact them (as the data controller) directly if: (i) you would no longer like to be contacted by them; or (ii) to access, correct, amend, modify or delete inaccurate data. If requested to remove data by our customer, we will respond within a reasonable time.

We may transfer personal information to companies that help us provide our service, and when we do, these transfers to subsequent third parties are covered by appropriate transfer agreements. We will retain personal data we process on behalf of our customer as needed to provide services to our customer. We will also retain this personal information as necessary to comply with our legal obligations, resolve disputes, and for enforcement of our agreements.

Posh is headquartered in the United States of America and maintains a global infrastructure. Information that we collect and maintain may be transferred to, or controlled and processed in, the United States and/or other countries throughout the world. When you provide us with information, or utilize our website(s) and services, you consent to this transfer. We will protect the privacy and security of personal information we collect in accordance with this Privacy Policy, regardless of where it is processed or stored.

## **6. Security**

Posh follows generally accepted standards to protect the personal information submitted to us, both during transmission and receipt, however, no security measure is perfect. We recommend safeguarding your password and sharing it with only those authorized to access your account.

## **7. Changes to this Statement/Contact Us**

We may update this Privacy Policy to reflect changes to our practices. If we make any material changes, we will provide a notice on this website and we may notify you by email prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices. If you continue to use the Services after those changes are in effect, you agree to the revised policy.

If you have any other questions about this policy please contact [hello@posh.tech](mailto:hello@posh.tech).