



VOW PRIVACY POLICY/NOTICE

INTRODUCTION

We respect your privacy and are committed to protecting your personal data. This Privacy Notice informs you about how we use your personal data when you interact with us or visit our website (regardless of where you visit it from) and tell you about your rights and how the law protects you.

This Privacy Notice is provided in a layered format and explains the specific areas set out below.

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1. IMPORTANT INFORMATION ABOUT US AND THIS NOTICE

This Privacy Notice aims to give you information on how Vow collects and processes your personal data when you use our website and services, such as when you register your interest for a demo, when you chat with us, order a service or sign up for one of our events or webinars. This website is not intended for children, and we do not knowingly collect data relating to children.

It is important that you read this Privacy Notice so that you are fully aware of how and why we are using your data.

Controller

[Aleph Group Inc.](#) is the holding company of different legal entities, including Httpool, Internet Marketing, d.o.o., which is the provider of this webpage. When we mention » VOW Made or Vow «, »we«, »us«, or »our« in this Privacy Notice, we are referring to the relevant company, part of the Aleph Group, providing you services and responsible for processing your data, which is also considered to be the data controller of your personal data.



We have appointed a Global Data Protection Officer who is responsible for overseeing compliance in relation to this Privacy Notice. If you have any questions about this Privacy Notice, including any requests to exercise your rights, please contact the Global Data Protection Officer using the details below.

Contact Details

If you have any questions about this Privacy Notice or our privacy practices, please contact our Global Data Protection Officer in the following way:

Email address: privacy@alephholding.com.

Address: Httpool, Internet Marketing, d.o.o., Litostrojska cesta 52, 1000 Ljubljana, Slovenia

Changes to this Privacy Notice

We keep our Privacy Notice under regular review. This version was last updated on 7th of March, 2024. Historic versions can be obtained by contacting us.

Third Party Links

This website may include links to third-party websites, plug-ins and applications. For example we use Salesforce, Hubspot, Hotjar and AWS. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the Privacy Notice of every website you visit.

2. WHAT PERSONAL DATA DO YOU COLLECT ABOUT ME?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymized data).

We may collect, use, store and transfer different types of personal data about you which we have grouped together as follows:

Identity Data includes first name, last name, username or similar identifier, title.

Contact Data includes physical address, email address and telephone number.

Bank Account Data includes payment details such as bank account numbers and your billing address.

Transaction Data includes details about payments to and from you.



Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.

Usage Data includes information about how you use our website, services, etc. All of the information processed is used to solve our clients issues/restrictions and improve their advertising on Meta platforms through us.

Marketing and Communication Data includes your preferences in receiving marketing from us and third parties and your communication preferences.

We may also collect, use and share aggregated Data, such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Notice.

We do not collect any special categories of personal data about you (this includes details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offenses.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to discontinue our service to you, but we will notify you prior to doing so.

III. WHAT LEGAL BASES DO YOU USE?

In short: We will only collect and process your personal data if we have a legitimate reason to do so. We always rely on one of the following legal bases when we use your personal data: contractual obligations, legal obligation, legitimate interest, consent, and substantial public interest.

1. Contractual obligations. To meet our contractual obligations towards you and be able to offer you our services, we need to process certain personal data.
2. Legal obligation. In some cases, we need to collect and retain your personal data in order to comply with applicable laws and regulations.
3. Consent. This legal basis applies when you have affirmatively consented to us collecting your personal data. This is usually the case when you indicate that you agree that your personal data is collected, e.g. by ticking a box. In cases where we process personal data based on your consent, you reserve the right to revoke



this consent at any time. For more information, please refer to the section “How can I exercise my rights”.

4. Legitimate interest. In some cases, we collect and use your personal data because we have a legitimate reason to use it and this is reasonable when balanced against your human rights and freedoms.

IV. HOW IS MY PERSONAL DATA COLLECTED?

Information you provide to us	We collect personal data from you when you: <ol style="list-style-type: none">1. register to open an account with us2. request a demo3. fill in any forms4. respond to a survey5. correspond with us (e.g. via email, on social media or over the phone)6. subscribe to our newsletter
Information collected from your use of our website	As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies. We may also receive Technical Data about you if you visit other websites through the use of cookies.

V. HOW DO YOU USE MY PERSONAL DATA?

See the ways in which we may use your personal data using this table:

What we use your personal data for	Type of personal data	Lawful basis

<p>To register you as a new customer</p>	<ol style="list-style-type: none"> 1. Identity 2. Contact 	<ol style="list-style-type: none"> 1. Performance of a contract with you 2. Necessary to comply with a legal obligation 3. Necessary for our legitimate interests (to conduct a background check)
<p>To carry out our obligations relating to your contract with us</p>	<ol style="list-style-type: none"> 1. Identity 2. Contact 3. Bank Account 4. Transaction 	<p>Performance of a contract with you</p>
<p>To notify you about changes to our terms and this Privacy Notice</p>	<ol style="list-style-type: none"> 5. Identity 6. Contact 	<ol style="list-style-type: none"> 1. Performance of a contract with you 2. Necessary to comply with a legal obligation 3. Necessary for our legitimate interests (to keep our records updated)
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<ol style="list-style-type: none"> 1. Identity 2. Contact 3. Technical 	<ol style="list-style-type: none"> 1. Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization exercise) 2. Necessary to comply with a legal obligation



To use data analytics to improve our website, products/services, marketing, customer relationship experience	<ol style="list-style-type: none">1. Technical2. Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To measure and understand the effectiveness of advertising we serve and to deliver relevant advertising to you	<ol style="list-style-type: none">1. Identity2. Contact3. Technical4. Usage5. Marketing and Communications	<ol style="list-style-type: none">1. Necessary for our legitimate interests (to develop our products/services and grow our business)2. Where you've consented for us to process your personal data in a certain way

If we change the way we use your personal data, we'll update this notice and, if appropriate, let you know by email as soon as possible.

Third party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

If you no longer want to receive marketing-related emails from us or third parties, you may opt-out by following the instructions in any such email. We will try to comply with your request as soon as reasonably practicable. Please note that if you opt-out, we may still send you important administrative messages, from which you cannot opt-out.

VI. COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

We use the following cookies on our website:



Name	Provider	Type	Valid for
csrftoken	Vow Made	Necessary Cookie	5 hours
sessionid	Vow Made	Necessary Cookie	session / 24 hours
ga#	Google Analytics	Statistics	2 years
_ga	Google Analytics	Statistics	2 years

VII. DO YOU SHARE MY PERSONAL DATA WITH THIRD PARTIES?

i. Aleph group companies

We share your personal data within the Aleph group of companies to:

i. provide you with the best service;

ii. send you information about Aleph products and services we think you'll be interested in hearing about.

ii. Suppliers

Here we have included companies that help Vow provide the services you use, and need to process details about you for this reason. We always share as little information as we can and encrypt and/or make it impossible for the recipient to identify you where possible. These are:

- analytical and cyber security service providers that help us with fraud and security checks, such as Qualys;
- cloud computing power, storage and software providers, such as AWS and Google Cloud;
- our business intelligence and analytics platform provider, such as Big QueryGoogle Analytics
- companies that help us with functional analytics (to help us solve technical problems, for example), such as Sentry SDK.
- companies that help us monitor performance and transactional logs, such as Datadog.
- companies that help us with marketing (we won't share identifiable personal data with third parties for their own direct marketing unless you give us permission, and you can opt out any time), such as Google and AppsFlyer for marketing analytics.
- software companies that we use to email you, or for processing and storing emails with you, such as SendMail;



- companies that help us with customer support, surveys, and developers, such as Freshdesk.

iii. Partners who help to provide our services

We may share your personal data with our partners to provide you with certain requested services. We'll only share your personal data in this way if you have asked for the relevant service. From time to time, we may work with other partners to offer co-branded services or promotional offers, and we will share some of your personal data with those partners. We will always make sure you understand how we and our partners process your personal data for these purposes.

iv. For legal reasons

We also share your personal data with government authorities, law enforcement authorities, tax authorities or courts:

- if we have to do so under any law or regulation;
- if we sell our business;
- in connection with suspected or actual criminal or fraud investigations;
- to enforce our rights (and those of our customers or others);
- in connection with legal claims.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

VIII. TRANSFERRING PERSONAL DATA OF EU/EEA, UK AND SWISS RESIDENTS

Is my personal data transferred internationally?

In short: We may transfer, store, and process your information in countries other than your own. We provide an international service which, in some instances, may require transferring, storing, and processing of your personal data in a country outside the UK, EU/EEA and Switzerland. To do so, we have taken all necessary steps to ensure that your data is afforded a level of protection that is essentially equivalent to that guaranteed within the EU/EEA, the UK and Switzerland. For that reason, we will only transfer your data to a third country:

- if the European Commission has adopted a decision confirming that a third country provides adequate protection (or the competent authority in the UK or Switzerland has done so for transfers outside these territories); or
- if we've agreed to Standard Contractual Clauses ("SCCs") approved by the European Commission (for EEA), to SCCs via the ICO's UK Addendum (for the UK)



or an equivalent mechanism for Switzerland for transfers outside its territory with a third party.

IX. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

X. HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as reasonably necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

You can request details of retention periods for different processing of your personal data by contacting us.

Under certain circumstances, you can ask us to delete your personal data: see your rights below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

XI. WHAT RIGHTS DO I HAVE?

In short: Under data protection legislation in the UK, EU/EEA and Switzerland you may have certain rights, including but not limited to the right to access or manage your personal data, to delete or update it, and restrict its use.



1. Right to be informed: you have the right to be informed about how we collect and use your personal data. We provide you with this information in this Privacy Notice and by answering any privacy-related questions you address to us.
2. Right to access your data: you have the right to request a copy of the personal data we hold about you.
3. Right to rectification: you have the right to have inaccurate or incomplete personal data rectified.
4. Right to erasure: under certain circumstances, you may have the right to have your personal data deleted. Examples of when this request may be granted include when:
 - it is no longer necessary to process your data for the purpose it was collected,
 - you have withdrawn your consent for consent-based data processing,
 - we have used your personal data unlawfully, or
 - we have a legal obligation to remove your data.
5. Right to restrict or object to the processing of your personal data: in certain circumstances, we may agree to restrict or suppress the processing of your personal data. Examples of when we may agree to this include:
 - you have asked us to verify the accuracy of your data,
 - we have processed your data unlawfully, but you do not wish your data to be deleted,
 - we no longer need your personal data, but you do not wish your data to be deleted in order to establish, exercise, or defend a legal claim, or
 - you objected to us using your personal data, but your objection was outweighed by our legitimate interests.
6. Right to challenge an automated decision: you have the right to request us to manually review an automated decision made about you if that decision has a legal or similarly significant effect on you.
7. Right to withdraw consent: if the legal basis we use for the processing of your personal data is consent, you can withdraw your consent at any time.
8. Right to opt-out of commercial communication: you have the right to opt-out of any future commercial communication through the unsubscribe link provided with each commercial email. You further have the right to not be contacted by phone regarding any commercial offering. Please note that your country may offer a telemarketing do-not-call-list.
9. Right to data portability: You can ask us to transfer personal data to you or another company if we can, and are allowed to do so under regulatory requirements, we'll provide your personal data in a structured, commonly used, machine-readable format.

XII. HOW CAN I EXERCISE MY RIGHTS?



If you wish to exercise any of your rights, please contact us at privacy@alephholding.com.

i. How and when we will respond to your request

For security reasons, we may ask you for proof of ID to confirm your identity to be able to deal with your request.

We try to respond to all requests as soon as possible and maximum within one (1) month of receiving the request. However, it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

If a third party exercises one of these rights on your behalf, we may need to ask for proof that they've been authorised to act on your behalf.

If we are unable to do so, we'll make sure to communicate to you why we might require more time to respond to your request.

Vow usually will not charge you a fee when you exercise your rights. However, we're allowed by law to charge a reasonable fee or refuse to act on your request if it is manifestly unfounded or excessive.

ii. How to lodge a complaint

You have the right to make a complaint at any time to your country's supervisory authority. If you live in the EU/EEA, you can find a list of competent supervisory authorities [here](#). If you live in the UK, you can refer your issue to the Information Commissioner's Office ([ICO](#)).