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1 Introduction

At GoFacing SL (hereinafter, “we” or “us” or “our” or “GoFacing”), we sincerely care about privacy, security, and transparency; these core elements play a substantial role in our company's mission. This privacy notice covers the GoFacing service, which is a branded service owned and operated by GoFacing SL, GoFacing branded products, software, and websites. It outlines how and why we collect, store, and process the personal data of users that interact with us, visiting our websites, using our services, using our interactive applications, or other products and services, including software downloads.



2 GoFacing's Role

We offer different services and may consequently hold different roles when we process personal data in relation to the GoFacing service and the GoFacing branded products, software, and websites:

GoFacing as 'data controller': GoFacing acts as the data controller for the personal data you provide to us through our branded websites or when you register and use the GoFacing service as a direct user (e.g. through Trial, GoFacing Free, or eCommerce solution), or other direct interactions, like new hire application or subscribing to newsletters.

GoFacing as 'data processor (or sub-processor)': GoFacing acts as the data processor for the personal data you provide to us when you activate and use the GoFacing service or products or software through any of the GoFacing affiliated partners who are authorized to sell the GoFacing service or products or software. When GoFacing acts as the data processor, all processing of your personal data by GoFacing will be governed by a data processing agreement between GoFacing and the partner, and this data processing agreement will constitute GoFacing's legal basis for the processing

3 How we collect your data

We may collect a variety of information depending on how you interact with us, the GoFacing Service or products, or our websites. This information can be collected using direct interactions, automation, or third parties. Here's more information about these methodologies:

3.1 Direct interactions. We may receive your personal data directly when you, for example:

Contact us directly, e.g. using email, chat, or contact forms

Request marketing information to be sent to you

Sign-up and use the GoFacing service as a direct user

Purchase a product or service

Download software

Participate in an online survey

Submit an application

Provide us feedback



3.2 Automated technologies or interactions. When you use our website or our services, we may collect technical data about your computing system and browsing activity. This data is gathered by employing cookies and related tools. To learn more about the cookies we utilize on this site please refer to our cookie notice.

3.3 Third parties

Your personal data may be received via a third party as follows:

Via analytics through providers such as Google Analytics or Hubspot

Via a GoFacing authorized partner reselling the GoFacing products or services

Via a customer of an authorized partner purchasing the GoFacing products or services

Google to manage Google Hangout service interoperability

Microsoft to manage MS Teams service interoperability

If enabled, from Google to store your Google account details for YouTube live recording authentication and YouTube to store your live recording link, title and time of streaming

From service providers, for third party tools we use to manage day to day business operations, including companies such as:

4 The type of data we collect

GoFacing collects data in order to provide the best experiences we can when you visit GoFacing branded websites or use GoFacing branded products and services. Please note that it is possible to visit our websites without providing personal data about yourself. However, in order for you to best utilize the resources and information we offer on our website (for example downloading product brochures, eBooks, sign up for our newsletter, or start a software test drive), we will need to collect some personal data from you to provide the services and the information that you request of us.

You may not be able to use some of our products and services if you decline our collection of your personal data. Examples of personal data we collect:

-**Contact and personal details:** name, email, phone number, occupation, etc.

-**Credentials:** passwords, saved user preferences, security settings, etc.

-**Demographic information:** your geographic location, time zone, preferred language, etc.

Device and usage data: how you use our apps, when you accessed our service, what type of device you use, your IP address, the internet address you accessed our services from, your internet service provider, etc.

Payment details: For eCommerce users, we collect any necessary information required to process your payment, such as a credit card number and the security code associated with your preferred payment method.

Your contacts: if you use a GoFacing branded product in combination with a registered GoFacing account, to manage or access contacts, or to communicate with other people and organizations, we may collect information about your relationships and interactions with those contacts.

Your image: for example, if you choose to store a personal image under the user profile of your GoFacing account or any third party services GoFacing interacts with.

5 How we use the data we collect

We process the personal data you provide to us in strict accordance with the principles outlined in this privacy notice. We have the following purposes and legal basis for collecting and using your personal data:

To enable you to use our services: in order for you to use the GoFacing service you have to activate an account with GoFacing or be invited by your service administrator. Upon such invitation and/or activation we require some personal data, including contact details, login information, payment details (if relevant) etc. Such processing is based on the contract entered into when subscribing to the services either directly or via the GoFacing affiliated partner who are authorized to sell the GoFacing service.

Delivery of services: To operate and deliver our services, products, software and websites effectively, GoFacing may process personal data such as demographic information, time zone, occupation, call history, preferred user settings and other information related to your use of the services or making product recommendations based on your device or current location, or send important notifications to communicate information necessary to the continued use of our products or services.

GoFacing processes such personal data based on our legitimate interest in delivering our services, products, software, and websites to you in an effective way.

Customer support: we might use data to diagnose and fix service and product problems and issues, as well as providing more effective customer care. GoFacing processes such personal data based on our legitimate interests in fulfilling our contractual and legal obligations according to a contract or order.

Contract management: In connection with the administration and management of contracts with GoFacing's customers, suppliers etc.,

GoFacing may process personal data such as contact information of contact persons at such customers, suppliers etc. GoFacing processes such personal data based on our legitimate interests in fulfilling our contractual and legal obligations according to a contract or order.

To respond to inquiries: GoFacing may also process personal data in order to follow-up inquiries from website users, direct users of our services etc. The legal basis for such processing is GoFacing's legitimate interest in providing support to its users.

Submitting information about the services to registered users: GoFacing may process your personal data in order to send notifications or information pertaining to the services or your account that are necessary in order to the continued use of our products or services. This will typically be information about changes in terms of use, this privacy notice etc. Such processing is based on the contract entered into when subscribing to the services, or GoFacing's legitimate interest in providing certain information about the use of the services (depending on the type of information).

Improving our products and services: To help us understand and improve our products and service, as well as the content we offer (e.g. in order to send communications relevant to our users), as well as the information and content we provide on GoFacing branded websites. Such processing is based on our legitimate interest in improving our services, our website etc.

Security and safety: we must use data in order to protect the security of our products and users. This can include (but is not limited to) detection of fraud and malicious software, confirming the validity of software licenses, and resolving disputes or enforcing our service agreement. GoFacing processes such personal data based on our legitimate interests in fulfilling our contractual and legal obligations according to a contract or order.

Relevant sales and marketing communications: You will receive promotional communications if you have requested information from us, purchased products or services from us or if you provided us with your details when you subscribed to our newsletter or any other forms on our website and, in each case, you have not opted out of receiving such communication. You're able to opt out from our mailing list by using the unsubscribe link at the bottom of such emails.

Recruitment: If you apply to a position in GoFacing, GoFacing may process your personal data in order to assess your application. The legal basis for such processing is that it is necessary in order to fulfill the contract with the candidate, or in order to take steps at the request of the candidate prior to entering into a contract. Applications will normally be stored for [1] year after the completion of the application process unless you consent to further storage.

Ensure compliance and legitimate interests: GoFacing may also process personal data in order to comply with statutory obligations to which GoFacing is subject, and to safeguard own or third parties legitimate interests, e.g. in relation to establishing a legal claim or preventing unauthorized access to or disclosure of personal data.

6 How long we use your data?

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for (as described in this privacy notice), including for the purposes of satisfying any legal, accounting or contractual obligations, or any reporting requirements or laws. For personal data related to your specific use of our products and services, for example your call history, our stated policy is to retain that data as long as we have a legitimate purpose or legal basis for processing (in accordance with the purposes described in this privacy notice), unless otherwise impacted by one of the listed criteria below:

How long do we need access to the data for in order to deliver our products and services and maintain effective business operations? Is there a reasonable expectation from customers that we will store their personal data until they explicitly request us to delete it?

Is GoFacing, as the owner and operator of the GoFacing service, subject to legal, contractual, regulatory, or similar, obligations to retain certain types of data? For example, mandatory data retention laws in your region, or government requests and investigations.

When your personal data is no longer needed to be retained for any of the purposes stipulated in this privacy notice, we may delete or anonymize your personal data. Anonymized data - i.e. data that can no longer be associated with you as an individual - may be further used for research and statistical purposes in which case we may use this information indefinitely without further notice to you

7 Disclosure and storage of personal data

As part of our product and service delivery, GoFacing works with various affiliated partners who are authorized to sell GoFacing branded products or services on behalf of GoFacing. We also use some tools managed by third-party service providers in order to fulfill the delivery of certain aspects of our products and services. We will never, ever provide or sell personal data to organizations not recognized as an affiliated GoFacing partner, or otherwise connected to helping us deliver operations to customers essential to our products and services.

Disclosure of data to GoFacing affiliated partners: where appropriate, we may provide your details to affiliated GoFacing partners in order to fulfill your request for service delivery or further information:

Affiliated GoFacing partners are partner businesses officially authorized to resell GoFacing products and services on our behalf

In the event we share personal data with an affiliated partner, we will only do so in order to fulfill service delivery or improve our products and services

Personal data will not be shared with affiliated partners for general marketing purposes
Sharing data with third-party services providers: where necessary, GoFacing shares personal data with companies who provide essential services for delivering our products and services to customers. These might include services for:

Information processing, payment processing, credit checks, fulfilling customer orders, delivering products to you, managing and enhancing customer data, providing customer service, assessing your interest in our products and services, and conducting customer research or satisfaction surveys.

Some of these companies operate and store data outside of the EU.

All of our third-party service providers are checked to ensure they comply with EU and applicable local data privacy and security regulations.

All processing by such third parties are subject to a data processing agreement, which, among other things, limits such third parties' use of the personal data to the performance of the agreed services.

Disclosure of data to comply with legal or public jurisdiction requests: in rare circumstances, where we are compelled, by law, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence to disclose your personal data. We may also:

Disclose information about you if we determine that to do so is necessary or appropriate for reasons of national security, law enforcement, or other major issues of public importance

Disclose information about you if we determine that disclosure is reasonably necessary to enforce our terms of service or protect our operations or users
In the event of a re-organization, merger, or sale we may transfer any or all personal data we collect to the relevant third party.

External websites: where relevant, in order to provide additional information on certain topics, our websites may link to external websites we do not own or manage: We cannot control, and are not responsible for, how these websites collect and use information.

This privacy notice is valid only for GoFacing branded domains, owned and managed by GoFacing AS, as the owner and operator of the GoFacing service. When using such third party websites, we recommend that you read the relevant sites terms and privacy notice.

Presenters: At the request of any person who hosts and/or presents information in a conference ("presenters"), the GoFacing service may collect certain personal data and other information which any presenter in any conference may see and may be shared with other users of the service at the request of a presenter or as an automatic function of the service, including without limitation:

Your name, address, phone number, and email address

Any other personal data or other information you provide to the service or as requested by any presenter

Storage: Personal Data and other information may be stored and/or processed in multiple locations in which GoFacing or its affiliates maintain facilities. GoFacing will ensure that all such locations and affiliates comply with EU and applicable local data privacy and security regulations, e.g. by use of EU model clauses, privacy shield certification, etc.

8 Protection and security of personal data

When operating the GoFACING service and GoFACING branded products, GoFACING takes great care to ensure all reasonable precautions— including administrative, technical, and physical measures— to safeguard your personal data against loss, theft, and misuse, as well as against unauthorized access, disclosure, alteration, and destruction.

Secure Sockets Layer (SSL) encryption:all GoFACING branded web pages and online services or products always use SSL encryption where personal data is collected. To make purchases from these services, you must use an SSL-enabled browser such as Safari, Firefox, or Chrome. Doing so protects the confidentiality of your personal data while it's transmitted over the Internet.

Our global network: the GoFACING Service is deployed via a globally-distributed network of resources which constitute the GoFACING Service Network as owned and operated by GoFACING AS.

Services are hosted and maintained at geographically-specific "Points-of-Presence" (PoPs) as well as within cloud-based services that have global availability. GoFACING PoPs are hosted at data centers managed by facility service providers. Each facility meets or exceeds international security compliance standards. Personal data collected through GoFACING service may be stored and processed in any country in which GoFACING and its affiliates maintain facilities.

By registering for and using GoFACING services, you are accepting to the transfer of data to any country in which GoFACING and its affiliates maintain facilities, as well as the use and disclosure of your personal data as described in this privacy notice.

9 Access and control of your personal data

You have the right to access the information we have about you at any time, as well as request the personal data we store about you is deleted, modified, or exported for portability reasons.

For accessing, modifying, or exporting your personal information, or to request that we delete your personal data, please submit your request via email to support@gofacing.com

The request will be processed and completed in compliance with our privacy notice, terms of service, our business relationship and any data privacy laws applicable in your country.

If the processing is based on your consent, you may also withdraw your consent at any time (without affecting the lawfulness of processing based on consent before its withdrawal). If you have previously consented to receive promotional email communications from us, you can use the unsubscribe function at the bottom our emails to unsubscribe from our emails at any time ("withdraw your consent"). If you have an active GoFacing account, it's not possible to opt-out of basic emails since we need to communicate basic information, where relevant, to users in order to continue delivery of the account.

Since GoFacing's global headquarters are located in Spain we are governed by Spain's Data Protection Directive, as well as the EU's GDPR ("general data protection regulation") to ensure our privacy policy is being followed.

10 Out commitment to GDPR

GoFacing is committed to the highest standards of information security, privacy and transparency. Towards this, GoFacing complies with the GDPR (EU Regulation 2016/679) as both a data controller and a data processor.

For any questions regarding the GoFacing commit to GDPR or any other privacy processes, please contact support@gofacing.com

11 Future changes to our privacy notice

As our business grows and our services and products evolve, this privacy notice may change, or other privacy notices may be written and posted specifically to address new offerings or to keep pace with data privacy laws.

When changes are substantial, we will first ensure to make you aware of any forthcoming changes by attempting to contact you directly via email, or via our user interfaces, or via indirectly through your authorized partner which is reselling the GoFacing service or product.