

Privacy Policy

What kinds of information do we collect?

When you set up your account with us, we collect the following information directly from you:

- your company names and names of your employees, account users and contact persons;
- identifiers such as registration numbers, identity numbers and VAT registration numbers;
- contact details such as e-mail addresses, telephone numbers and fax numbers;
- location information such as your country of incorporation and physical address;
- financial information such as banking details, payment method; and
- your username and password.

We collect this information for all the obvious reasons:

- we want to provide our services to you;
- bill you (and get paid);
- communicate with you about your account;
- recognise you when you communicate with us or want access to your account;
- make sure that you actually exist (that you are not a fraudster);
- comply with any legislation or regulation which requires us to collect the information; and to
- check your references.

We also collect information and content you provide through your account

- Networks and connections (types of connection, ISP, IP address and connection speed, etc.)
- Your account usage (volume of SMS sent, campaign name, Sender ID, SMS log reports etc.)
- Device Information (language, time zone, operating system, hardware and software versions, browser type etc.)

For some of our services we will require additional information. For instance, when you want to make use of short code we need additional information about your company and what you intend to use the product for, to ensure that its use is within the legal scope permitted by our license as a Service Provider and in compliance with the regulations laid out by the Office of the Commissioner of Electronic Communications and Postal Regulation.

How do we use this information?

There are many reasons why we have to collect Information or customer data. For instance:

- You are able to view some of the information on your account.
- We need some of the information (for instance the content of your messages) to provide our services.
- We need to collect it so we can bill you.
- We use the data to manage and route traffic, to analyse and improve our services and to identify and solve problems.
- Sometimes we are required by law to have this information to assess and report on whether you are complying with all regulatory requirements.
- Provide, personalize products
- Provide measurement and analytics
- Promote safety, integrity and security of our communication platforms and systems
- Communicate with you
- Research and innovate our product and services
- Provide you with information on your purchase history in case of enquiries made by you

How is this information shared?

We do not sell or otherwise share your information with third parties aside from the sharing described in this section. In particular, we do not share information with third parties for their direct marketing purposes, unless you have given us consent.

In order to deliver our services we will have to share information with other communications service providers or network operators such as CyTA, MTN and Primetel to enable them to transmit your communications. We only share the information which they need. How they deal with the information is subject to their own policies.

We also make use of third party service providers. An example of this is when we share information with service providers so they can store the data. These service providers are not entitled to use the information for any other purposes, must keep it confidential and have given us reasonable assurances that the information is safe.

Sometimes we may need to disclose your information to a third party if:

- we believe that disclosure is reasonably necessary to comply with any applicable law, regulation, legal process or a government request;
- to enforce our contracts and policies;
- to protect the security and integrity of our services;
- to protect ourselves, our other customers and the public from illegal activities; or
- to respond to an emergency which we believe in good faith requires us to disclose information.

What is our legal basis for processing data?

We collect, use and share the data that we have in the ways described above:

- as necessary to fulfil our Terms of Use and allow you to access and manage your account;
- consistent with your consent, which you may revoke at any time through the dedicated opt-out tool;
- as necessary to comply with our legal obligations;
- to protect your vital interests, or those of others;
- as necessary in the public interest; and
- as necessary for our legitimate interests, including our interests in providing an innovative, personalized, safe, and profitable service to our users and partners, unless those interests are overridden by your interests or fundamental rights and freedoms that require protection of personal data.

How can you exercise your rights provided under the GDPR?

Under the General Data Protection Regulation, you have the right to access, correct, transfer and delete your data. You also have the right to object to and restrict certain processing of your data. This includes the right to object to our processing of your data for direct marketing, which you can exercise by using the "unsubscribe" or "opt-out" links or CTA in such marketing communications;

Data retention, account deactivation and deletion

We store data until it is no longer necessary to provide our services and our communication and management products, or until your account is deleted - whichever comes first. This is a case-by-case determination that depends on things like the nature of the data, why it is collected and processed, and relevant legal or operational retention needs.

When you delete your account, we delete things you have uploaded, such as phone lists, email addresses, profile details and you won't be able to recover that information later. If you don't want to delete your account but want to temporarily stop using our communications and management services, you can deactivate your account instead by calling us on 22444411 or emailing us your written request to info@gtdigital.eu. To delete your account at any time, please send us your written request by email clearly identifying your account and providing clear instructions.

Financial information we receive about you (including financial transaction data related to purchases made via our website) can be accessed and preserved for an extended period when it is the subject of a legal request or obligation and governmental enquiry.

How do we store and transfer data?

There is the possibility, due to limitation of storage capacity of our servers, that information controlled by us will be transferred or transmitted to, or stored in, other countries outside of where you live using third party cloud storage services such as AWS or Microsoft Azure other data storage facilities with whom we contract with to store our data. These storage or data centres are based in the European Union.

How to contact us with questions

If you have questions about any of our policies, you can contact us as described below:

Data Protection Officer

GT Digital
131 Kyrenias Avenue
2113 Aglantzia
Nicosia
Cyprus

by Email at: dpo@gtdigital.eu

online via our contact form: <http://gtdigital.eu/ContactUs.aspx>

by mail to the address below:

GT Digital
P.O.Box 24688
CY-1302 Nicosia
Cyprus