

# Privacy Policy

DIFLEX (“us”, “we”) is committed to protect your privacy and personal data. This Privacy Policy is published in compliance with the General Data Protection Regulation (GDPR) and explains how we collect, process, share and protect personal data of our customers (“YOU”, “YOUR”). It also describes your choices regarding use, access, correction, and deletion of your personal information.

If you do not agree with the data practices described in this Privacy Policy, you should not use DIFLEX or any of its Services.

This privacy policy applies web site owned and maintained by DIFLEX <https://diflex-voip.com/>. OUR website contains links to other sites such as Facebook, Instagram, LinkedIn and YouTube which are outside our control and are not covered by this privacy policy. If you access other sites using the links provided, your information may be used by those sites in accordance with their privacy policy, which may differ from ours.

## CONSENT TO THIS POLICY

You acknowledge that this Privacy Policy is a part of the Terms of Use of our Services, and you unconditionally agree that becoming a User signifies your (i) assent to this Privacy Policy, and (ii) consent to DIFLEX using, collecting, processing and/or disclosing your Personal Information in the manner and for the purposes set out in this Privacy Policy and the Terms of Use.

## WHAT INFORMATION DO WE COLLECT AND WHEN?

DIFLEX collects and processes personal data that is necessary to provide you with services and best meet your needs, for obtaining feedback, also only in aggregated or anonymized form for statistical analysis and business intelligence purposes.

We collect more specific information about you in certain circumstances which may include the following:

- Your name and last name;
- City and country of your residence;
- Contact data (such as email address and phone number);
- Demographic data (such as your gender);
- Language preferences;
- Time zone;
- Working hours indicated in your personal profile (personal details section);
- Billing information (such as billing address, taxpayer ID);

- Other information that you voluntarily choose to provide to us (such as photo, ----).
- We may collect additional information in connection with your participation in any promotions, competitions and surveys offered by our web site.

If you apply for a role at DIFLEX we will keep your information secure during the application process. If you are successful with your application your personal data will then be included in our internal processes. If you are not successful, then we do not retain your details.

You are responsible for maintaining the accuracy of the information you submit to us, such as your contact information provided as part of account registration. If your personal information changes, you may correct, delete inaccuracies, or amend information. We will make good faith efforts to make requested changes in our then active databases as soon as reasonably practicable. If you provide any information that is untrue, inaccurate, out of date or incomplete (or becomes untrue, inaccurate, out of date or incomplete), or DIFLEX has reasonable grounds to suspect that the information provided by you is untrue, inaccurate, out of date or incomplete, we may discontinue the provision of the Services.

#### **WHAT DO WE DO WITH THE INFORMATION WE COLLECT?**

We will use information to:

- Provide our services to you;
- Contact you by email, text message or phone.

If you wish to opt-out of receiving non-essential communications such as promotional and marketing-related information regarding the Services, please send us an email: [info@diflex-voip.com](mailto:info@diflex-voip.com)

We do not share information about you without your specific permission. We take your right to privacy and personal data protection very seriously and other than as specifically stated in this Privacy Policy, will only disclose your Personal Information in the event it is required to do so by law, supervisory body or law enforcement agency.

#### **HOW LONG DO WE KEEP YOUR DATA?**

We may retain your information for as long as is necessary to provide support-related assistance and reporting only. We shall not retain such information for longer than is required for the purposes for which the information may lawfully be used or is otherwise required under law for the time being in force. Your data may be anonymized and aggregated, and then may be held by us, if necessary, for us to provide our services effectively, but our use of the anonymized data will be solely for analytic/statistical purposes.

## **SECURITY**

WE implement reasonable security practices and procedures to protect the personal data from unauthorized access, improper use or disclosure, unauthorized modification and unlawful destruction or accidental loss. WE implement reasonable security practices and procedures and have a comprehensive documented information security program and information security policies that contain managerial, technical and operational security control measures that are commensurate with respect to the information being collected and the nature of our business.

We take every precaution to prevent loss, misuse, or alteration of your personal information. These precautions include:

- hardware stored in secured data centers behind firewalls
- access to information restricted by password
- restrictions to what information can be accessed by employees.

## **COOKIES**

DIFLEX's website uses a tracking tool to provide understanding of visitors to the site. A number of cookies are used to provide that information and better identify unique visitors and make tracking more efficient. Most browsers allow the cookie function to be turned off and you do not need to allow your browser to accept cookies in order to use the DIFLEX website.

## **SOCIAL MEDIA**

These services provide social buttons and similar features which we use on our website, such as the "Facebook" button. To do so, we embed code they provide which we do not control ourselves. For these buttons to function, they generally know if you are logged in. DIFLEX does not have access to that information, nor can we control how those networks use it.

## **ADDRESS FOR PRIVACY QUESTIONS AND YOUR DATA PROTECTION RIGHTS**

Should you have questions about this Privacy Policy or our information collection, use and disclosure practices, you may contact us via our email [dpo@diflex-voip.com](mailto:dpo@diflex-voip.com) We will use reasonable efforts to

respond promptly to any requests, questions, or concerns, which you may have regarding our use of your personal information.

In certain circumstances, you have the following data protection rights:

- The right to access, update or to delete the information we have on you
- The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete.
- The right to withdraw consent. You also have the right to withdraw your consent at any time where DIFLEX relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Personal Data Protection Service about our collection and use of your Personal Data. For more information, please contact [office@pdps.ge](mailto:office@pdps.ge)

OUR DPO may be contacted by email at [dpo@diflex-voip.com](mailto:dpo@diflex-voip.com).

#### **CHANGE TO PRIVACY POLICY**

We may update this Privacy Policy at any time. In the event there are significant changes in the way we treat User's personally identifiable information, or in the Privacy Policy itself, we will display a notice on the site, so that you may review the changed terms prior to continuing to use the Services. As always, if you object to any of the changes to our terms, and you no longer wish to use the Services, you may contact [info@diflex-cvoip.com](mailto:info@diflex-cvoip.com) to deactivate your account. Unless stated otherwise, our current Privacy Policy applies to all information that DIFLEX has about you and your account.