

PRIVACY POLICY

OUR COMMITMENT TO PRIVACY

Your privacy is important to us and maintaining your trust is one of our highest priorities. Dialogtrail collects information, including certain personally identifiable information (“**Personal Data**”), from members of the public who visit our website (found at www.dialogtrail.com (the “**Website**”) or who interact with our customers through integrations offered by our customers (“**Customer Integrations**”), through Customer websites, or otherwise, in the course of our Customers’ use of the Dialogtrail Services (the “**Services**”).

To ensure that your privacy is protected and your privacy choices are respected, this Privacy Policy includes a description of our information practices, how we use tracking technologies, as well as the decisions you may make regarding how your information is collected and used.

1. ABOUT US

Dialogtrail is a Swedish company, headquartered in Gothenburg. Dialogtrail is an enterprise chatbot platform for companies around the world supporting our customers to create conversational experiences with their clients primarily by using third party Messaging services and leveraging data and artificial intelligence to personalize and automate marketing campaigns.

In practical terms, this means that we collect information for our use or on behalf of our Customers to customize messages and conversations to such users (“you”), including marketing messages, that you may find useful and to help Dialogtrail and our Customers understand your (marketing) preferences.

In all cases, as a data processor to our Customers, we process the data collected through our Services only on behalf of our Customers, work strictly in accordance with their instructions since they are the data controllers, and do not use any personal information for our own purposes.

2. INFORMATION WE COLLECT WHEN YOU USE OUR WEBSITE

Dialogtrail acts as a data controller with respect to the information it collects from visitors to its Website. Dialogtrail collects information from users of our Website for several reasons. Some users request additional information about us, so we may ask for, and receive, contact information (such as name, email address, company name, etc.), which enables us to respond to such requests.

We may also collect and use the following information about you if you visit our

Website:

- a. the content of any email or other communication that you send to Dialogtrail, for example, when you make inquiries about Dialogtrail and its products;
- b. your email address, if you subscribe to a Dialogtrail newsletter;
- c. information automatically collected about visitors to the Website, as described in the section entitled 'Tracking Technologies' below; and
- d. information you submit when participating in any surveys conducted by us.

3. INFORMATION WE COLLECT BECAUSE OUR CUSTOMER HAS CHOSEN TO SEND SUCH INFORMATION TO US WHEN YOU USE AN INTEGRATION

We may collect information about you that our Customers choose to share with us, that is collected by their Customer Integrations or other digital properties, such as your Facebook profile, timezone, birthdate, name and/or gender. As a data processor Dialogtrail does not choose the information that will be sent to it by its Customers and follows the instructions of its Customers in connection with the processing of all of such information.

Our Customers may ask us to track your activity and certain performance metrics in connection with your use of a Customer Integration or other digital properties, for example if you have abandoned a shopping cart. Our Customers may send us information about your previous actions in their Customer Integrations or other digital properties, for example, information about how many times you have purchased items through their Customer Integrations, digital properties, stores, or elsewhere.

From platform providers such as the Facebook platform, Instagram, Facebook Messenger, Line, KiK, Slack we may collect information such as your name, email address, gender, interests, platform specific user identifier, timezone, language settings and information about your previous actions in connection with these platforms.

4. USE OF INFORMATION

We may use the information we collect from our Customers for a variety of reasons, including:

- a. to provide, operate and maintain the Services;
- b. to manage our Customers' use of the Services, respond to inquiries and comments and provide Customer service and support;
- c. to analyze our Customers' use of the Services for trend monitoring, marketing and advertising purposes;
- d. to send our Customers technical alerts, updates, security notifications, and administrative communications;
- e. to investigate and prevent fraudulent activities, unauthorized access to the Services, and other illegal activities; and

For any other purposes about which we notify our Customers.

5. SHARING AND DISCLOSURE OF INFORMATION TO OTHERS

We may share and disclose information about our Customers and you in the following circumstances:

- a. Customers – we may disclose information to our Customers in the form of aggregated, anonymous data about the way the Services have been used to enable us to provide and improve our Services, to provide strategic advice to our Customers, and to further and enhance our role as a thought leader in the industry;
- b. Compliance with laws – we may disclose information to a third-party where we are legally required to do so in order to comply with any applicable law, regulation, legal process or governmental request;
- c. Business transfers – we may share or transfer information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company; and
- d. Provision of our Services – We use sub-processors in our provision of the Dialogtrail Services to our customers, such as third party hosting providers and third party

database support services. Some of these third party sub-processors may have logical access to data about you, but in all cases, any sub-processor to whom we disclose any information will be subject to a written agreement containing confidentiality protections designed to protect any personal information that is shared with them.

Protection of our legal rights – we may also disclose information where we believe it necessary in order to protect or exercise, establish or defend our legal rights

6. SECURITY

We use technical, organizational and administrative measures designed to protect the security, confidentiality and integrity of information that is submitted to, collected or processed by our Services about our Customers and about you. Each of our Customers will have its own technical, organizational and administrative measures to protect the data it processes as well as its and its employees' passwords and log-in credentials to the Dialogtrail Services. It is our Customers' responsibility to assess the appropriateness of the security measures they have in place to protect any data that you provide to them.

7. TRACKING ON OUR WEBSITE

Our Website may use cookies (small text files containing a string of alphanumeric characters that we put on your device) and/or other tracking technologies to distinguish you from other Website users.

When you visit our Website we may send one or more cookies to your browser. They enable us to store information about your device that is then used for matching certain other device-related information that we collect via the browser. This helps us, among other things, to provide you with a good experience when you browse our Website and also allows us to recognize you when you return and to learn your interests so we can better respond to any inquiries you may make.

You have the right to decide whether to allow websites such as dialogtrail.com to lay cookies on your browser. You can set or amend your web browser controls to accept or refuse cookies. If you choose to reject cookies, you may still use our Website, although your access to some functionality and areas of our Website may be restricted. The process to disable cookies through your web browser may vary from browser-to-browser, so you should visit your browser's help menu for more information.

7.1. ANALYTICS

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

Google Analytics (Google Inc.)

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data collected: Cookies and Usage Data.

Place of processing: US – [Privacy Policy](#) – [Opt Out](#).

Facebook Ads conversion tracking (Facebook, Inc.)

Facebook Ads conversion tracking is an analytics service provided by Facebook, Inc. that connects data from the Facebook advertising network with actions performed on this Application.

Personal Data collected: Cookies and Usage Data.

Place of processing: US – [Privacy Policy](#).

7.2 CONTACTING THE USER

The services contained in this section enable the website Owner to store customer contact information after it has been voluntarily been given by the the customer.

MailChimp - (The Rocket Science Group, Inc.)

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list, provided by MailChimp. Those who may receive email messages containing information of commercial or promotional nature concerning this Application. Your email address might also be added to this list as a result of signing up to this Application or after making a purchase.

Personal Data collected: Email address, first name, last name, Usage Data and Cookies.

Place of processing: US – [Privacy Policy](#).

7.3 DISPLAYING CONTENT FROM EXTERNAL PLATFORMS

Wistia video (Wistia, Inc.)

Wistia is a video content visualization service provided by Wistia inc. that allows this Application to incorporate content of this kind on its pages.

Personal Data collected: Cookies and Usage Data.

Place of processing: US – [Privacy Policy](#).

7.4 HEAT MAPPING AND SESSION RECORDING

Heat Mapping services are used to display the areas of a page where Users most frequently move the mouse or click. This shows where the points of interest are. These services make it possible to monitor and analyze web traffic and keep track of User behavior.

Some of these services may record sessions and make them available for later visual playback.

Inspectlet (Inspectlet, Inc.)

Inspectlet is a session recording and heat mapping service provided by Inspectlet Inc.

Inspectlet honors generic „Do Not Track” headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers. Personal Data collected: Cookies, Usage Data and various types of Data as specified in the privacy policy of the service.

Place of processing: Malta – [Privacy Policy](#) – [Opt Out](#).

7.5 INTERACTION WITH SUPPORT AND FEEDBACK PLATFORMS

This type of service allows Users to interact with third-party support and feedback platforms directly from the pages of this Application. If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service.

HubSpot Chat Widget (HubSpot, Inc)

The Hubspot Chat Widget is a service for interacting with the HubSpot Message platform provided by HubSpot Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: US – [Privacy Policy](#).

7.6 REMARKETING AND BEHAVIORAL TARGETING

This type of service allows this Application and its partners to inform, optimize and serve advertising based on past use of this Application by the User. This activity is performed by tracking Usage Data and by using Cookies, information that is transferred to the partners that manage the remarketing and behavioral targeting activity. In addition to any opt out offered by any of the services below, the User may opt out of a third-party service's use of cookies by visiting the [Network Advertising Initiative opt-out page](#).

Facebook Remarketing (Facebook, Inc.)

Facebook Remarketing is a Remarketing and Behavioral Targeting service provided by Facebook, Inc. that connects the activity of this Application with the Facebook advertising network.

Personal Data collected: Cookies and Usage Data.

Place of processing: US – [Privacy Policy](#) – [Opt Out](#).

Facebook Custom Audience (Facebook, Inc.)

Facebook Custom Audience is a Remarketing and Behavioral Targeting service provided by Facebook, Inc. that connects the activity of this Application with the Facebook advertising network.

Personal Data collected: Cookies and email address.

Place of processing: US – [Privacy Policy](#) – [Opt Out](#).

AdWords Remarketing (Google Inc.)

AdWords Remarketing is a remarketing and behavioral targeting service provided by Google Inc. that connects the activity of this Application with the Adwords advertising network and the Doubleclick Cookie.

Personal Data collected: Cookies and Usage Data.

Place of processing: US – [Privacy Policy](#) – [Opt Out](#).

LinkedIn Conversion Tracking and Insight Tag (LinkedIn, Inc.)

LinkedIn Insight Tag to track conversions, retarget website visitors, and unlock additional insights about members interacting with our LinkedIn adverts.

Personal Data collected: Cookies and email address.

Place of processing: US – [Privacy Policy](#) – [Opt Out](#).

Albacross (Albacross Nordic AB)

Albacross works by identify companies that are visiting a website by tracking the IP-address, and then by making that insight actionable. The cookie is used for Company-Targeted display advertising, website engagement analysis.

Personal Data collected: Cookies and IP-address.

Place of processing: Sweden – [Privacy Policy](#) – [Opt Out](#).

HubSpot Prospects (HubSpot, Inc.)

HubSpot Prospects works by identify companies that are visiting a website by tracking the IP-address. The cookie is used for Company-Targeted display advertising, website engagement analysis and CRM contact integration.

Personal Data collected: Cookies and IP-address.

Place of processing: US – [Privacy Policy](#)

7.7 TAG MANAGEMENT

This type of service helps the Owner to manage the tags or scripts needed on this Application in a centralized fashion. This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

Google Tag Manager (Google LLC)

Google Tag Manager is a tag management service provided by Google LLC.

Personal Data collected: Cookies and Usage Data.

Place of processing: US – [Privacy Policy](#).

8. YOUR PRIVACY RIGHTS

In general, as a data processor, when processing personal information to provide our Services, we do so only on behalf of our Customers and in accordance with their instructions as the data controller. This means that if you wish to access, review, correct, transfer, modify or delete any personal information we process on behalf of a Dialogtrail Customer, you should contact that Customer with your request. We will then help them to fulfill that request in accordance with their instructions and applicable legal requirements.

Where we act as a data controller and hold personal information for our own account management, billing or marketing purposes, then we provide individuals with the opportunity to access, correct, transfer, review, modify, or delete any such personal information that has previously been provided. You can send an email to hello@dialogtrail.com.

9. UNSUBSCRIBE FROM OUR MAILING LIST

You may at any time ask us to remove you from any mailing list on which you previously asked Dialogtrail to include you by sending us an email at hello@dialogtrail.com or by clicking "Unsubscribe" in any e-mail communications we send you.

10. If THINGS CHANGE

If we change our Privacy Policy, we will update the "Last Updated" date at the top of this webpage. We encourage you to review this Privacy Policy frequently to stay informed of the latest modifications.

11. CHILDREN

Our Services are not directed to individuals under the age of 13. We do not knowingly collect personal information from such individuals without parental consent and require our Customers to fully comply with applicable law in the data collected from children under the age of 13. If you become aware that a child has provided us with information, please contact us at hello@dialogtrail.com If we become aware that a child under the age of 13 has provided us with personal information, we will delete such information.