

RISPONDO IO

PRIVACY POLICY

Rispondo.io offers users global phone community services transacted through various software applications and services, including but not limited to the “Rispondo.io” application. Rispondo.io offers a product for consumers based on call recognition, which deliver a safe and secure way for people to identify calls and block scam.

Our Software holds a publishing certificate for the Rispondo io database (rispondo.io) for its website and mobile applications in Slovenia. INTERNAZIONALE d.o.o is the responsible publisher. The publishing certificate provides for constitutional protection under the Slovenian Fundamental Law on Freedom of Expression (YGL) meaning that the General Data Protection Regulation (GDPR) does not apply to the extent the processing of personal data does not infringe the constitutionally protected right of freedom of expression.

For the processing activities that are subject to the GDPR, the following clauses apply.

DATA CONTROLLER AND CONTRACTING PARTY

Rispondo.io is firmly committed to the security and protection of personal information of our Users. This Privacy Policy describes how Rispondo.io will collect, use, share and process personal information. Capitalized terms not defined in this Privacy Policy are defined in the Rispondo io Terms of service.

We process Your profile data (name, phone number etc.) and information about Your activity on the Rispondo.io application including device information, IP address and location to provide, improve, analyze and personalize the Services for You. We have enhanced our privacy center to provide You with more ability to access and control Your data.

Subject always to obtaining your prior consent, we may:

We block unwanted calls from numbers reported by you and from the default blocked call center number database of respondo.io

We do not:

store or share any personal information of contacts from Your address book provide reverse number look up of contacts from Your address book.

1. WHAT PERSONAL INFORMATION WE COLLECT

1.1 USER PROFILE

When You create a user profile in the Services and confirm being the holder of a certain number, Rispondo.io will collect the information provided by You. In order to create a user profile, You must register Your first name, last name and phone number. Additional information that may be provided at Your option include, but is not limited to, photo, gender, street address and zip code, country of residence, email address. If You register for a Paid Service, Rispondo.io will collect Your payment and billing information.

1.2 INSTALLATION AND USE

When You install and use the Services, Rispondo.io will collect personal information from You and any devices You may use in Your interaction with our Services. This information may include e.g.: geo-location; Your IP address; device ID or unique identifier; device manufacturer and type; device and hardware settings; SIM card usage and details; applications installed on your device; ID for advertising; ad data, operating system; web browser; operator; connection information; screen resolution; usage statistics; default communication applications; access to device address book; device log and event information; logs, keywords and meta data of incoming and outgoing calls and messages; version of the Services You use and other information based on Your interaction with our Services such as how the Services are being accessed (via another service, web site or a search engine); Your paired devices (such as smart watch); the pages You visit and features you use on the Services; the services and websites You engage with from the Services; content viewed by You, content You have commented on or sent to us and information about the ads You see and/or engage with; the search terms You use; order information and other usage activity and data logged by Rispondo.io's servers from time to time. Rispondo.io may collect some of this information automatically through use of cookies and You can learn more about our use of cookies in our Cookie Policy.

Some information, including, but not limited to, usage information and other information that may arise from Your interaction with the Services, cannot be used to identify You, whether in combination with other information or otherwise and will not constitute personal information for the purposes of this Policy.

1.3 THIRD PARTY SERVICES

You may provide us with Your user identifier information regarding, or to enable Your usage of, certain third party services (together with a mapped photo where applicable) e.g. social networking services and payment services, in order for the Services to interoperate with such third party services. You may use such third party services to create Your user profile or log in to our Services, share information with such third party services, or to connect Your user profile with the respective third party services. Such third party services may automatically provide us with access to certain personal information retained by them about You (e.g., your payment handle, unique identification information and information about the advertisements You have been shown or may have clicked on). You may be able to control the personal information You allow us to have access to through the privacy settings on the respective third party service. We will never store any passwords created for any third party services.

1.4 OTHER INFORMATION YOU MAY PROVIDE

You may provide us with various information in connection with Your interaction with our Services. For example, You may through tagging functionality associate a phone number, that is not registered in the Rispondo.io database or belongs to a User, with a business or name and You may report a phone number as spam or some other attribute to be included in spam blocking directories.

2. HOW WE USE YOUR PERSONAL INFORMATION

2.2 PROVIDE, IMPROVE AND PERSONALIZE OUR SERVICES

Rispondo.io may use the personal information collected to provide, maintain, improve, analyze and personalize the Services to its Users, partners and third party providers. More specifically, Rispondo.io may use such information to: provide smart caller ID, dialer and messaging functionality that, among other features, allow for population of unidentified numbers and other data in call or message logs, display the name associated with a certain number for incoming or outgoing calls and messages or following a manual number search against the Rispondo.io database; display the number associated with a certain name following a manual name search against the Rispondo.io database, subject to that name searches will only produce a number linked to the name if the number is available for search in a public database or relates to a User who has made his or her name available for search.

send in application push notifications of how many calls have been blocked.
maintain User spam lists and build a community based spam blocking directory;
enable You to use and share Your information in connection with Your registration, login or other use of third party services e.g. payment service providers, online services, social networking sites and other third party API's;
provide customer support, respond to Your queries, investigate and resolve issues related to the Services;
otherwise improve our Services, business and operations.

2.3 STATISTICAL DATA FROM THE SERVICES

We use aggregated or anonymized personal information for statistical and analytical purposes. We do not consider personal information to include information that has been made anonymous or aggregated so that it can no longer be used to identify a specific person, whether in combination with other information or otherwise. We may collect, use, transfer, and disclose non-personal information for any purpose.

PERSONALIZE OUR MARKETING AND COMMUNICATIONS

Subject to the choices You make upon registration and in Your settings at any time, we may use the information collected, as set out above, to provide You with location and interest based advertising, marketing messaging, information and services. We may also use the collected information to measure the performance of our advertising and marketing services. Furthermore, we may contact You for verification purposes or with information pertaining to the Services or special offers, e.g. newsletter e-mails, SMS and similar notifications about Rispondo.io's and our business partners' products and services. We also use the collected information to respond to you when you contact us.

3. COMPLIANCE WITH LAWS AND PREVENTION OF FRAUDULENT OR ILLEGAL ACTIVITIES

We may use the collected information to comply with applicable laws and to enforce our agreements and protect and defend the rights or safety of Rispondo.io its Users or any other person and verify provided User profile information with third party providers and ensure technical service functionality and data accuracy, perform troubleshooting and prevent or detect fraud, security breaches or illegal activities.

3.1 DISCLOSURE OF PERSONAL INFORMATION

In addition to the sharing and disclosure of personal information that is included as part of the functionality of the Services as described in section 2, Rispondo.io may disclose personal information if we believe such action is necessary to:

comply with the law, or legal process served on us;

protect and defend our rights and the enforcement of our agreements; or

protect the security and safety of Users or members of the public or other aspects of public importance, provided, of course, that such disclosure is lawful.

We transfer information to trusted vendors, service providers, and other partners who support our business and Services, such as providing technical infrastructure services.

We may disclose and transfer Your Information to our associated or affiliated organisations or related entities and to any third party who acquires, our business, whether such acquisition is by way of merger, consolidation or purchase of all or a substantial portion of our assets.

3.2 LEGAL BASES AND DATA RETENTION

Rispondo.io will collect and process Your personal information in order to perform the contract with You (e.g. to deliver the Services), based on Your consent (i.e. the choices You make upon registration and in Your settings) or based on a legitimate interest of Rispondo.io (which is not overridden by your interests or fundamental rights and freedoms). Such legitimate interests of Rispondo.io include to protect and maintain the security of the Services, to

create and maintain spam blocking directories, to understand and improve our Services and user relationships and to administer our business and customer support.

Where we process data based on Your consent, You may withdraw your consent at any time via Your settings. Rispondo.io will retain Your personal information while You maintain a user profile in the Services. You may at any time choose to delete Your user profile and Your personal information via Your settings. If You make such choices, Your personal information will no longer be visible to others in the Services. We will retain Your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law. We may also retain Your personal information in order to accommodate Your choices regarding marketing.

4. INFORMATION SECURITY AND TRANSFER OF PERSONAL INFORMATION TO OTHER COUNTRIES

Rispondo.io will not transfer your personal data outside the European Union. Rispondo.io has implemented physical, electronic, and procedural safeguards in order to protect the information, including that the information will be stored on secured servers and protected by secured networks to which access is limited to a few authorized employees and personnel.

5. ACCESSING AND CONTROLLING YOUR PERSONAL INFORMATION

Rispondo.io provides many choices for You to control and manage Your personal information via the settings in the Rispondo.io Privacy Center. Subject to applicable law, you may also have the following rights in relation to Your personal information:

Right of access: You may request a confirmation as to whether or not personal information is being processed by Rispondo.io and to obtain a copy of that information. We may decline to process requests that are vexatious or frivolous or extremely impractical, jeopardize the privacy of others, or for which access is not otherwise required by applicable law.

Right to rectification: You may request rectification if Your personal information is inaccurate.

Right to erasure: You may request that your personal information is erased in certain situations e.g. if it is no longer necessary to provide the Services to You.

Right to object: You may object to the processing of Your personal information in certain situations e.g. for use of Your data for ad targeting.

Right to restriction: You may request restrictions of the processing of Your personal information in certain situations e.g. if Your personal information is inaccurate or unlawfully processed.

Right to data portability: You may request to receive personal information provided by You in machine readable format.

You can exercise Your rights above via the Rispondo.io Privacy Center where You e.g. can access, edit, delete and download Your personal information and limit or opt-out of the collection and use of Your information for ad targeting and the provision of special offers or promotions by third parties. You may also contact Rispondo.io for assistance using the contact information below, and we will consider your request in accordance with applicable law.

6. CHILDREN'S PRIVACY

We do not intentionally or knowingly collect or solicit information from children under the relevant age of consent under the laws of their respective jurisdictions or knowingly allow such persons to register for the Services. The Services are not directed at children under the relevant age of consent under the laws of their respective jurisdictions. If you believe that we might have information from or about a child under the relevant age of consent, please contact us at info@rispondo.io

7. CHANGES TO THIS PRIVACY POLICY

Rispondo.io may at any time change this Privacy Policy. Rispondo.io will notify the Users of such changes by push notice or via notice in the Services or by other means. If You object to any changes, You may uninstall the Rispondo.io applications and cease using the Services. Your continued use of the Services after Rispondo.io have communicated changes to this Privacy Policy, will mean that the collection, use, sharing and processing of Your personal information is subject to the new Privacy Policy. We may from time to time set out more detailed information on how we process your personal information in relation to particular Services in supplemental Privacy Notices which shall be incorporated into and form part of this Privacy Policy.

8. COOKIES

As described in our Cookie Policy, we use cookies, web beacons, flash cookies, HTML 5 cookies, pixel tags and other web application software methods, including mobile application identifiers, to help us recognize you across the Services, learn about your interests both on and off the Services, improve your experience, increase security, measure use and effectiveness of the Services, and serve advertising. You can control Cookies through your browser settings and other tools. By interacting with the Services, you consent to the use and placement of Cookies on your device in accordance with this Privacy Policy, which by reference incorporates our Cookie Policy.

9. CONTACT US

For questions or complaints related to this Privacy Policy or the processing of Your personal information, we encourage You to contact our Data Protection Officer via dpo@rispondo.io You can also reach us by physical mail at the following address: INTERNAZIONALE, trgovina na debelo, d.o.o., Kidričeva ulica 19, 5000 Nova Gorica, Slovenia.

