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Personal Data Policy

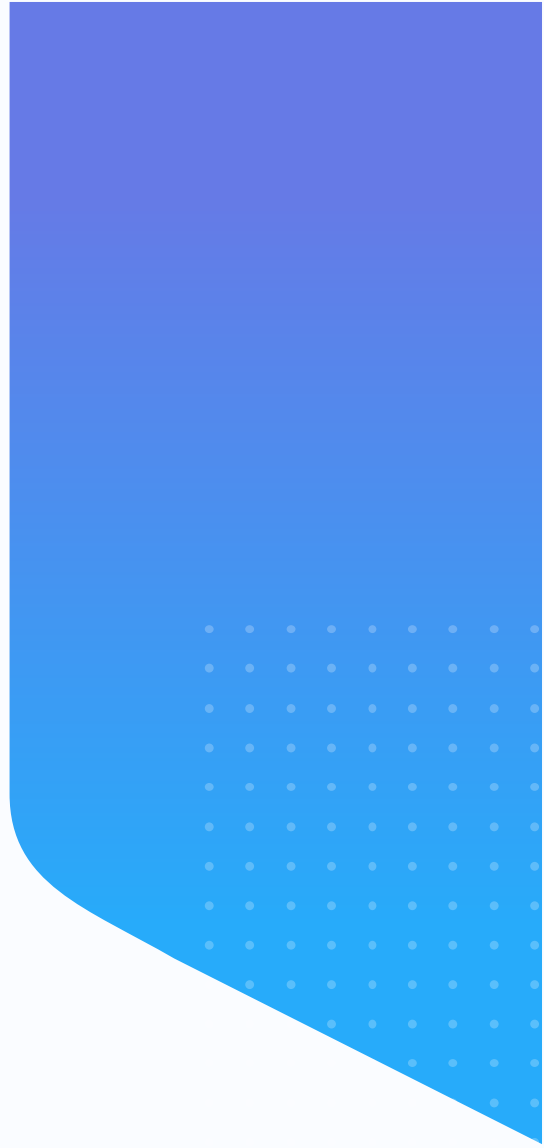# GatewayAPI's Personal Data Policy

Table of content

General

At **OnlineCity.io**, we value your privacy and take the protection of your personal information very seriously. Therefore, it is important to us that you understand how we collect, store and process your personal information.

This Personal Data Policy applies to the processing of personal data that occurs when we collect information about you and when you use our services, including our websites.

This Personal Data Policy explains what personal information we collect on you as well;

- Why they are collected

- How they are collected

- How the information is processed

- How and for how long they are stored

The Personal Data Policy also explains your rights in relation to your personal information and how you can exercise those rights, as well as fulfills our duty in regards to the GDPR Art. 14.

The Personal Data Policy must be read in conjunction with the terms of the particular service you use, which may indicate additional specific terms regarding the personal information that we collect about you.

OUR CONTACT INFORMATION

OnlineCity.IO ApS
Buchwaldsgade 50,
5000 Odense C

VAT ID: 27364276
Phone: +45 66 11 83 11
Mail: info@onlinecity.dk

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Key principles

OnlineCity.io's Personal Data Policy can be summarized as follows:

- We are open and transparent about what and how we collect your information.

- We are always working to implement measures to store and process your personal information in a safe and secure manner.

At **OnlineCity.io**, we believe that all customers are entitled to the same high standard of privacy. That is why we apply our key privacy principles in all the countries where we operate. We always process your personal information in accordance with the following key

principles:

1. We always process your information based on this Personal Data Policy and applicable European and Danish regulatory requirements.

2. We always tell you what, why and how we collect personal inform ation on you as well as how we process and store this information. As a customer of **OnlineCity.io**, there will never be any surprises.

3. We will only process your information for legitimate purposes and we will only keep your information for as long as it is necessary to carry out such purposes or is required by applicable law.

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4. At **OnlineCity.io**, we enable our customers to make relevant choices and to control our use of personal data, not only when required, but in all cases where we find it appropriate and technically feasible.

5. We fully respect your rights as registered to protect your information under applicable law. These include:

   a. The right to be informed on what information we collect on you

   b. The right to easily accessible and understandable information

   c. The right to be deleted in so far as it does not violate any other applicable law such as accounting law

   d. The right to restrict treatment, that is, the court to limit what information we process on you

   e. The right to data portability, ie. the right to have your data delivered in a machine-readable format

   f. The right to object, that is, to object to the use of your information

   g. Right to rectification, that is, the right to have your information changed or updated

   6. Based on a continuous IT risk assessment, we make decisions on appropriate measures to secure your information, whether in physical or digital form, and wherever in the world they may be stored.

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Information on the processing of personal data, etc. in OnlineCity.io ApS

GatewayAPI, subsidiary of **OnlineCity.io** ApS ("**OnlineCity.io**") is the data controller for the processing of personal information we have received about you.

Roles of the Parties

The Parties, i.e. you and we, understand that for the provision of the Services a distinction is made between two types of processing of personal data: (i) the provision of platform services (i.e. the database of sms records and the logs created and managed by ONLINECITY.IO on behalf and under the supervision of you) for which ONLINECITY.IO will act as a data processor and agrees to comply with the respective obligations set out in Articles 3 – 11, and (ii) the transmission of messages (i.e. A2P SMS) by ONLINECITY.IO and other service providers for which ONLINECITY.IO will act as a data controller and agrees to comply with the respective obligations set out in Article 13.

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OnlineCity.io as a data controller

(Types of personal data)
The personally identifiable information we collect is:

- Email address

- Phone number

- IP address

(Types of data subjects)
Categories of registered or identifiable natural persons included:

- Customers

- Employees

- Potential customers

- Associates, affiliates and suppliers

This information is collected for the purpose of creating an account at **GatewayAPI.com**. The legal basis for the processing of this personal data is in connection with being able to uncover the needs of customers using the service at **GatewayAPI.com**. The personal information can also be used for sending invoices, newsletters, reports etc. Legal basis for the processing is the EU Data Protection Regulation, Article 6 (1) (b) and (f).

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The right to opt-out

You always have the right to opt-out and take back your consent. Contact us via the above-mentioned contact details to opt-out.

If you choose to withdraw your consent, it does not affect the lawfulness of our processing of your personal data on the basis of your previously given consent and up to the time of withdrawal. Therefore, if you withdraw your consent, it will only take effect from this time.

The rights of users in accordance with the General Data Protection Regulation

- Right to easily accessible and understandable information

- Right to information when collecting information

- Right to insight

- Right to rectification

- Right to erase and be forgotten, meaning to get your account deleted with all history at gatewayapi.com as long as this does not conflict with other legislation, including the Danish Bookkeeping Act.

- Right to restrict treatment

- Right to data portability

- Right to object to the processing of your data

- Timely exercise of the rights of data subjects

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Right to complain

You have the right to lodge a complaint with the Danish Data Protection Agency if you are dissatisfied with the way we process your personal data. You will find the Danish Data Protection Agency's contact information at www.datatilsynet.dk.

OnlineCity.io as a data processor

Types of personal data

- Telephone numbers

- Message logs

- Sender name

Types of data subjects

- Customers

- Employees

- Affiliates

The legal basis for the processing of this personal data is in connection with being able to uncover customers' needs by using the service on

GatewayAPI.com, as well as the data processor agreement entered into between you and ONLINECITY.IO. The legal basis for the processing is the EU Data Protection Regulation, Article 6 (1). 1 (a) and (b).

Use of cookies

Cookies are collected for marketing purposes, user login history and to remember user login and if the customer chooses "remember me" in the purchase flow and thus gives consent, as well as for general session management.

How does GatewayAPI.com collect personal information?

In addition to the information that you provide in connection with your account creation in order to use the services on the website, the website uses cookies. A cookie is a text file that is sent to your browser from a web server and stored on the hard disk of your desktop, tablet or smartphone. You can set your browser to notify you when you receive a cookie, or you can opt out of cookies altogether. We do not store personally identifiable information in our cookies.

For **GatewayAPI.com** API calls, IP address as well as coarse location data is logged at the IP address, and for chat requests via **GatewayAPI.com**, coarse location data is logged at the IP address as well as the IP address itself.

For each visit to **GatewayAPI.com** - regardless of the presence of a cookie - **GatewayAPI.com** builds log statistics. Log Statistics means that a statistical system collects information that can provide a statistical picture of how many visitors the website has had, where they come from, what parts of the website users leave the site etc. Log statistics are thus used for the purpose of optimizing the website and its functionalities. These statistics are anonymized.

Purpose of the log statistic

- to increase user-friendliness

- to measure the effectiveness of services

- to document the use of our platform / services

User-ID Tracking
Information is collected when using Google User-ID tracking to get a more accurate user count and not least to analyze the user experience of our logged in customers. We use this information to develop new forms of marketing campaigns and user experiences tailored to different device types and combinations of user activities.

Facebook tracking/pixel
Using Facebook's tracking code, we use the information to remarket on Facebook, to the users who have visited **www.GatewayAPI.com**, build audiences on Facebook, and to evaluate the effectiveness of campaigns. We do not have access to personally identifiable information in this regard.

Linkedin tracking
Using LinkedIn tracking code, we use the information to remarket on LinkedIn, to users who have visited **www.GatewayAPI.com**, and to evaluate the effectiveness of campaigns. We do not have access to personally identifiable information in this regard.

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Google login

If you sign up og sign in via Google, we will automatically receive your name and email address from Google. This happens only at the customer's own choice.

Google Analytics

Google Analytics is used as a statistics tool to study visitor behavior on the website. We do not have access to personally identifiable data.

Google Ads

Google Ads tracking is set up to track solely on sign ups. It is used as a backup tracking tool to Google Analytics.

Matomo

We use Matomo as a supplement to Google Analytics. Like Google Analytics, Matomo is used for statistical purposes.

VWO

We use VWO for analytical purposes that we can use for improving gatewayapi.com, such as heat maps, split-tests and session recordings. All user-identifying data are of course encrypted/hashed when we access them.

Login

Only information that you enter yourself will be sent to us.

Use of personal data

In addition to customer creation and login, personal information is used for customer support and notifications regarding the user's accounts.

As mentioned above, we use Google Ads, Facebook Ads and LinkedIn tracking. However, we do not have access to this personal data ourselves. Instead, we use the tools for profiling and linking traffic with conversions.

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In addition, there is email marketing. Here we process personal data to a greater extent, which includes name, email address and mobile number.

We also refer to our Terms & Conditions section 8.5 that states our efforts to combat spam, phishing and other harmful or unwanted traffic, where we periodically and randomly perform checks on SMS content to ensure its validity and legality, as well as following up on supplier-notified cases of the aforementioned unwanted traffic in order to stop the traffic.

Sharing of personal data

GatewayAPI.com exchanges personal information with suppliers and affiliates to fulfill sales and delivery obligations, including providing service and support for the products our customers use at Gatewayapi.com. **GatewayAPI.com** will only disclose personal information if required by law or if a court order exists. In addition, we pass on personal information to the debt collection agency in case of prolonged non-payment of invoices.

Personal information is treated confidentially and is only disclosed to our suppliers, partners and affiliates if it has a necessary purpose or public authorities where this is required by law.

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How long we keep your personal information?

If you have a user account at GatewayAPI: We store your personal information in **GatewayAPI.com** for up to 12 month of your user account being frozen, after which we delete your account. We freeze your account after 60 days without any activity, and notify you via email.

If you don't have a user account at GatewayAPI: We store your personal information gathered via the above-mentioned services for up to 18 months after your visit, after which it is anonymized.

Data covered under the data processing agreement will be stored in accordance with the data processing agreement.

Data export

GatewayAPI.com exports personal data to suppliers outside of the EEA only if EUs Standard Contractual Clauses apply and when there is an adequate level of data protection, as well as an confirmed ability of complying with the SCCs and GDPR.

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Securing personal data

- We only use Tier 4 data centers located in the EU.

- Strict login procedures

- The latest firewall and antivirus programs

- Confidentiality agreements with employees to process personal data

- Only employees with work-related purposes have access to personal data

- We ensure that buildings and systems used in connection with data processing are secure, and that only high-quality hardware and software is used, which is constantly updated.

- We ensure that employees receive adequate instructions and guidelines for the processing of personal data. The data processor is required to ensure that the employees involved in the processing of personal data are familiar with the security requirements.

- We ensure that employees who are authorized to process personal data have entered into confidentiality agreements or are subject to the necessary regulatory regulated confidentiality obligation.

- We ensure that data is used solely on behalf of the Data Processor and that the Data Processor cannot dispose of the information for his own purposes, including commercial use.

- Based on a continuous risk assessment of personal data breach, we introduce appropriate technical and organizational security measures to protect your personal information from unauthorized access, collection, use, disclosure, copying, modification or disposal.

- In the event that a provider of services or services is used, our IT security personnel ensure that the supplier always follows the same instructions as in the data processing agreement, and applies appropriate measures to protect the personal data that they process on our behalf.

- Strong communication security has been implemented on all our websites, such as TLS encryption 1.3, which ensures that data is encrypted, which ensures that information stays confidential when transmitted over the Internet.

Update and insight into information

As registered with **GatewayAPI.com**, you always have the right to object to the registration and you have the right to insight into what information is registered about you and to correct it. In addition, you have the right to limit the scope of your personal data. In addition, you have the right to receive your personal data and to request that the personal data be transferred from one data controller to another, as well as the right not to be subject to an automatic decision based solely on automatic processing, including profiling. You have these rights under the Danish Data Protection Act and in connection therewith are addressed to **GatewayAPI.com** via e-mail: support@gatewayapi.com. You can update your information by logging into your account at **GatewayAPI.com**.

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Updating this Personal Data Policy

We occasionally update this policy. If this happens, we will notify you of the changes via the website. You automatically accept the changes to the Personal Data Policy - to the extent permitted by applicable law - by using our service after being notified of any such changes. Therefore, we urge you to regularly review this policy on the website for the latest information on how we protect your personal information.

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Thank you
for your interest

If you have a question, concern or complaint regarding this Personal Data Policy or our handling of your information, please send an email.

Contact us here: **gdpr@gatewayapi.com**