



# Warm Zero Privacy Policy

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This privacy policy is designed to help you understand how your data is used, inform you of your rights and how to exercise your rights.

We want to give you a good user experience. We may collect your personal data that you pass on to us in order to keep in touch with you and to provide you with the best possible experience.

## What is personal data?

"Personal Data" (or "Data"), is all information that identifies you:

- either directly, for example, your last name, first name, email address or telephone number;
- or indirectly, for example your account ID, IP address, or cookie identifier.

## When We collect your personal data?

- You communicate with Us in written form (e.g., email, forum, chat) in a way that We can respond on the same communication channel.
- Verbal communication (e.g., phone) is possible, however, for special cases decided by Us (e.g., consultancy). The official communication channels are in written form.

## For what purpose We keep personal data?

- For a better user experience, first and foremost.
- We need your personal data to be able to contact you and respond to your requests.
- Some of the data may be used to differentiate normal and legitimate communication from unwanted practices (e.g. spam, scam, phishing).
- When required by law. In particular, invoices are kept in accordance with the law.

## What data is used by the website?

- The website may use cookies.
  - Cookies are required for the website to function properly in your browser.
  - You can delete cookies from your browser if you wish.
- The website may use analytics software, which is configured to anonymize visitor data.
  - Statistical data is used to improve the company's internal processes and ultimately the visitor's interaction with the website.

## What kind of data is kept?



- Contact information and other information you provide to us so that we can answer your questions or provide consulting services.
- Where possible, with security in mind, only a minimum of data is exchanged between us.
- Data required by the law documents is preserved. In particular the data for the invoices and proof of purchase.
- We may decide to discontinue certain data that we consider unnecessary to keep further.

### **Data used for Active License**

- In case you purchase an Active License for a software program, you will receive a license file that is designed to work on your computer, for the installed operating system.
  - The license file must be generated based on data collected from your computer, because the validation is performed on your computer.
- The data used to uniquely identify your computer and operating system is anonymized with hashes before it is used, with few exceptions: the name of our application (program) and the name of the operating system.
- The hashes you send are used to generate the license file.
  - We've implemented checks to make sure the license file is working as expected on your computer, because we can't know remotely if any part of your software affects our license registration software.

### **Your data inside files processed by HiText engine**

- This section refers to HiText software-as-a-service websites.
- Your files are kept on the server only as long as they are useful for the next steps.
- When you upload another file, the previous files are deleted. Data is no longer useful for the following steps.
- When you enter new text, the previous text is overwritten. The text is saved in a temporary file.
- It may sometimes be necessary for you to go back and forth between steps, make changes, then advance to next step. For this functionality, the text must be preserved until you start again with another file or text.
- Audio files are sent to third-party sites for transcription.
  - After transcription, the deletion request is sent for the corresponding input and output files.
  - We choose third-party providers which are in-line with our privacy policy. In particular: they do not keep data files once the delete request was sent to their site.
  - If you want to use audio files, we will send you the list of transcription providers so you can read their Privacy Policy and their Terms and Conditions. If you agree with their policy, their terms and this way of processing files, we can activate the automatic transcription for your account.
- In addition, you can choose to reset current data at any time. This request will delete your current files and current text. This action is useful at the end of the session.
- Data is transmitted via secure connections (https).
  - If you cannot access our site through https with a valid certificate, please use an updated version of your browser or try again later.



- Which web browser and browser plug-ins you use and how they handle the transmitted data falls under your responsibility.
- Your configuration includes options and rules set by you.
  - This is not considered sensitive data.
  - The configuration is preserved between sessions, so you can reuse it on subsequent files.

### **For how long the data is kept?**

- In general, we do not stack up data if there is no reason to keep it.
- We keep your data for the time necessary to carry out the operations for which said data has been collected.
  - There is no fixed period of time for a data type.
  - We evaluate from time to time whether some data would still be useful in the future or whether it can be deleted.
- If you have purchased an Active License for a software program, the license file should be copied by you to a safe location for backup purposes. We may keep either that file or some hashing data to be able to regenerate the license file for the same application and OS instance. This is for the case you lost your license file and request it later.

### **Is your Personal Data shared?**

- Your personal data is not intentionally shared by us, unless otherwise required by law.
- While we try hard to keep all the data as secure as possible, We cannot guarantee to cover everything. Unforeseen cases can exist. To minimize the chances of data leakage, context-sensitive data security methods are used.
- The website may use analytics software that is configured to anonymize visitor data. It depends on the analysis software how the raw data from the browser is processed before it is anonymized. By using the site, you agree to the analytics software.

### **What are your rights and how do you exercise your rights?**

- Obtain a copy of your Data – “Right of access and data portability”: At any time, you can request a copy of the data associated with You. If you have been sanctioned in relation to our Services, we will not be able to give you access to the data regarding your sanction so as to maintain our ability to detect or take action against such behavior.
- Correct your Data – “Right to rectification”: You have the right to correct your data when it is inaccurate or incomplete (for example, change your delivery address).
- Give and withdraw your consent – “Right to object and withdraw your consent”: At any time, you may withdraw your consent or object to the receipt of newsletters or advertising emails.
- Delete your Account – “Right to erasure (right to be forgotten)”: You can request the deletion of Your associated data. If you have been sanctioned in relation to our Services, we cannot delete the data regarding your sanction as to allow us to maintain your sanction.



- Limit the use of your Data – “Right to restriction of processing”: You also have the right to request that your data no longer be used or not be deleted during the time we are processing your request.
- To exercise your rights, you can contact Us in written form any time.

### **When can We use Your Data?**

- The existence of a contract between You and Us.
  - You can also enter into a contract by accepting one of the EULA or Terms and Conditions.
- Our legitimate interest (or reasonable expectations of users), to offer you the best possible user experience, such as to ensure the security of the services, respond to your requests and questions or to send you newsletters to which you have subscribed.
- Your consent to offer you advertisements, products, services or personalized content.

We are entitled to change this policy at any time. We will inform you of the material updates and recommend that you consult this policy on a regular basis or contact us if you have any questions. Using our Services following such a change means that you accept any changes.

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