



<https://poodll.com>

Privacy Policy

Last updated May 25th, 2018

Poodll provides a service (the “Service”), including a website available at <https://poodll.com> (the “Website”), which makes available various tools for use on client websites, including audio and video recorders, and audio and video players. “Poodll,” or “we” or “us” refers to Poodll Co. Ltd in this Privacy Policy (the “Policy”).

We at Poodll respect the privacy concerns of the users of the Service and the Website. We have created this privacy policy to explain (1) what information we gather from you when you visit the Website, (2) how we may use such information, (3) your choices concerning how we may use such information and (4) the security measures we take to protect such information.

Important:

Information collected via the Service is not covered in this document. For our Service policies please see “Poodll SaaS Terms of Service” and “Poodll Data Processor Addendum” documents.

Notice to EU Residents

This Policy is intended to provide adequate and consistent safeguards for the handling of personal information in accordance with Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (“the Directive”) and all the relevant transposing legislation of the Directive in the European Union/European Economic Area, the Swiss Federal Data Protection Act, as such laws may from time to time be amended and valid during the application of this Policy, the Privacy Shield, and any other privacy laws, regulations and principles concerning the collection, storage, use, transfer and other processing of personal data transferred from the European Economic Area or Switzerland to the United States including but not limited to the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (“the General Data Protection Regulation”) as of its entry into force on 25 May 2018.

Summary

Although you should read through the Policy for complete information on how we collect, use, share, and secure information, the following provides a summary of some the most important aspects of our privacy practices:

- We may use your personally identifiable information to provide you with services, including to process payments you make, to improve our services, and to provide you with information on products, upcoming events, and announcements.
- We may share your personally identifiable information under certain circumstances as disclosed in this Policy.
- We take reasonable measures to secure your personal information, but we cannot promise, and you should not expect, that your personal information will remain secure in all circumstances.

Principles for Processing Personal Information

We respect your privacy and are committed to protecting your personal information in compliance with the applicable legislation. This compliance is consistent with our desire to keep you informed and to recognize and respect your privacy rights. We agree to observe the following principles when processing personal information:

- Data will be processed fairly and in accordance with applicable law.
- Data will be collected for specified, legitimate purposes and not processed further in ways incompatible with those purposes.
- Data will be relevant to and not excessive for the purposes for which they are collected and used. For example data may be rendered anonymous if deemed reasonable, feasible and appropriate, depending on the nature of the data and the risks associated with the intended uses.
- Data subjects in the EU will be asked to provide their clear and unequivocal consent for the collection, processing and transfer of their personal data.
- Data will be accurate and, where necessary kept up up-to-date. Reasonable steps will be taken to rectify or delete personal information that is inaccurate or incomplete.
- Data will be kept only as it is necessary for the purposes for which it was collected and processed. Those purposes shall be described in this Policy.
- Data will be deleted or amended following a relevant request by the concerned data subject, should such notice comply with the applicable legislation each time.
- Data will be processed in accordance with the individual's legal rights (as described in this Policy or as provided by law).
- Appropriate technical, physical and organizational measures will be taken to prevent unauthorized access, unlawful processing and unauthorized or accidental loss, destruction or damage to data. In case of any such violation with respect to personal data, we will take appropriate steps to end the violation and determine liabilities in accordance with applicable law and will cooperate with the competent authorities.

Information We Gather Automatically

When you visit this Service, certain non-personally identifying information is recorded automatically by the standard operation of our Internet servers. Information such as the type of browser being used, its operating system, and your computer's Internet Protocol ("IP") address (a number that your Internet service provider assigns to your computer whenever you surf the Internet) is gathered in order to facilitate our online operations and to assure an efficient online experience for you. If you access our Service from

a mobile or other device, we may collect information for that device (including operating system, browser, type of device) in order to facilitate our mobile operations and to assure an efficient mobile experience for you. We may use or share this information for security purposes, to generate group statistics about our user community, or as required by law.

Among the purposes for which we may use such generally non-personally identifying information is for identification purposes in the event of an emergency threatening life or property, or where proper legal process allows using such information. For instance, we may use your IP address or other automatically recorded information, in cooperation with your Internet provider, to attempt to identify you if it is necessary to contact you or to bring legal action against you because you are violating the Terms of Service for use for this Service, may be causing injury to or interference (intentionally or unintentionally) with our company's rights or property, or may be adversely affecting other users of this Service or anyone else who could be harmed by your activities.

Personal Information You Provide To Us

We may request personally identifying information from you in a variety of contexts. For example, you may provide such data to us if you: (1) complete an online registration form (e.g., registering for an account, various sign-up forms for receiving email newsletters, registering for special offers or responding to a survey); (2) fill out an order form to request information; or (3) purchase any products or services from us or another Poodll business. Additionally, when you ask for help from our Customer Support team, we will collect and store the contact information you give them (generally, your name and e-mail address), information about your activity on our Services, and your user name. We will also store the communications you have with the Customer Service team and any information in those communications in order to provide support.

In such cases, the personally identifying information we request may include your name, email address, mailing address and zip code, phone number (collectively, "Personal Information"). In addition, we may collect other non-personally identifying information such as your date of birth, gender, country of residence, language preference, preferences and other customized activities in which you participate.

How Can Your Personal Information Be Used?

Within Poodll

When you purchase products or services from Poodll we will use your Personal Information to fulfill your order and for customer service.

Poodll keeps track of the websites and pages you visit within the Service, what features and content you use and how frequently. This information may be used by Poodll to maintain and improve the content, design, usability, and quality of the Service; to improve your user experience; to generate and provide statistics regarding use of the Service; to deliver customized content and advertising within the Service to

users whose behavior indicates that they are interested in a particular subject area, and to develop new products and services.

We may use your Personal Information and other non-personally identifying information we collect to update you about our products or services or to contact you about offers of new products or services that we believe may be of interest to you. You always have the option to receive fewer or no communications in the future from us by opting out. You may opt out by (a) following the instructions included in the specific communication you no longer wish to receive, (b) sending an email to support@poodll.freshdesk.com and explaining how you would like to modify your preferences.

Finally, without any specific approval from you, we may develop general aggregate data (i.e., data that cannot be used to identify specific individuals) about our user community that is partly based on information about you and your transactions with Poodll.

Service Providers

We may employ third party companies to provide customer support, perform Website-related services (e.g., without limitation, maintenance services, database management, web analytics and improvement of the Website's features) or to assist us in analyzing how our Service is used. These third parties may have access to your personal information to the extent required to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose. Examples of services we currently use are:

Service Provider Name	URL	Service description
Freshdesk	https://freshdesk.com	Helpdesk services and knowledgebase
Agile CRM	https://agilecrm.com	Customer relationship management and marketing automation

Mailing List

You can be added to the Poodll mailing list upon request; subscriptions to the mailing list can be cancelled at any time..

For Legal Enforcement Purposes

We reserve the right to disclose your Personal Information, as required by law or in special cases when we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against you if you are violating the Terms of Service for this Service or may be causing injury to or interference (intentionally or unintentionally) with our company's rights or property, other users of this Service or anyone else who could be harmed by your activities. Additionally, Poodll cooperates with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (including but

not limited to subpoenas), to protect the property and rights of Poodll or a third party, to protect the safety of the public or any person, or to prevent or stop activity we may consider to be, or to pose a risk of being, an illegal, unethical or legally actionable activity.

As an Asset of Poodll

If Poodll becomes involved in a merger, acquisition, or any form of sale or transfer of some or all of its assets, your information will be transferred to the acquiring entity. In such a situation, you will be provided with notice that a transfer of your information is imminent, and you will be given an opportunity to opt-out of the transfer of your information.

How Can You Correct or Review Your Personal Information?

You can access, review, update and correct Personal Information you have provided us by clicking on the Member link at the top right of the <https://poodll.com> website. If you prefer, you can also contact us by sending an email to support@poodll.freshdesk.com and explain how you would like to modify your preferences.

Safeguarding Your Personal Information

Poodll cares about the security of your Personal Information. We follow generally accepted industry security standards to safeguard and help prevent unauthorized access, maintain data security and correctly use such Personal Information.

Despite many advances in information security technology and procedures, however, no commercially deployed method of information transfer over the Internet or electronic data storage is known to be 100% secure. As a result, while we do strive to use modern and commercially reasonable means to protect your Personal Information, we cannot guarantee the absolute security of that information during its transmission or its storage in our systems.

For Parents Concerning the Privacy of Information on Their Children

The Website is not intended for use by children under 16 years of age. If you believe we have collected information about a child under the age of 16, please contact us at support@poodll.freshdesk.com so that we may take appropriate steps to delete such information.

International Operations and Transfers Out of Switzerland and the EEA

By using the Website, you authorize us to transfer and store your information collected there outside your home country, including Japan and the United States, for the purposes described in this policy. The

privacy protections and the rights of authorities to access your information in these countries may not be the same as in your home country.

Cookies

A "cookie" is a small text file that an Internet Service can place on your computer's hard drive for record-keeping purposes. Cookies make using this Website easier by, among other things, saving your passwords and preferences for you, and to help identify you whenever you return to the Website, so you do not need to reenter your identification information. Most Internet browsers are initially set up to accept cookies. However, you can reset your browser to refuse all cookies or to alert you when a cookie is being sent (note: you may need to consult your browser's "Help" area for instructions on how to do that).

Some of our web pages may contain electronic images (called "Clear GIFs", "Single-Pixel GIFs", or "Web Beacons") that allow us to count page views or to access cookies. In general, any electronic image viewed as part of a web page, including an ad banner, can act as a Clear GIF. Typically, though, Clear GIFs are very small (1-by-1 pixel size) files. They are often invisible on a web page, but their presence can be detected within many Internet browsers by setting your browser to view web page "sources". Clear GIFs are so small in order not to use valuable space on the computer screen that is better used to display helpful content. We may also include Clear GIFs in our email products in order to determine information about the opening and reading of such emails. Clear GIFs set by Poodll generally are not used to collect, gather, monitor, or share personal information about our users, though they can be used in conjunction with cookies to record particular actions. We use Clear GIFs primarily to compile aggregated, anonymous statistics about the Website usage.

Links to Other Sites

We do not endorse and are not responsible for the content or practices of web sites operated by companies outside of Poodll that may be linked to on the Website. You should not assume that their privacy policies or practices are the same as those followed by our company or by other Poodll companies. Visitors to any such web sites should refer to their respective privacy policies and practices.

How to Contact Us

If you have any questions or complaints about our Privacy Policy, you can contact us at 307 Tagawa Building, Hayama 1-6-5, Nagasaki Shi, Nagasaki Ken 852 8053, Japan #3044 or support@poodll.freshdesk.com. When we receive such inquiries about our Privacy Policy, we will use the Personal Information (such as your email address) only to respond to your question or comment.

You may request access to any Personal Information maintained on you by Poodll at any time by emailing support@poodll.freshdesk.com

You may email support@poodll.freshdesk.com to review, update, and revise your personal information.

If any information is inaccurate or incomplete, you may request that the data be amended. It is your responsibility to provide use with accurate personal information about yourself and to inform us of any changes. (e.g. new home address or change of name).

If you demonstrate that the purpose for which the data is being processed is no longer legal or appropriate, the data will be deleted, unless the applicable law requires otherwise. You also have the right to request the deletion of your personal data for any reason by emailing support@poodll.freshdesk.com

Obligations to Data Protection Authorities

We will respond diligently and appropriately to requests from DPAs about this Policy or compliance with applicable data protection privacy laws and regulations. We will, upon request, provide DPAs with names and contact details of the individuals designated to handle this process. With regard to transfers of personal information, we will (i) cooperate with inquiries from the DPA responsible for the entity exporting the data and (ii) respect its decisions, consistent with applicable law and due process rights. With regard to transfers of data to third parties, we will comply with DPAs' decisions relating to it and cooperate with all DPAs in accordance with applicable legislation.

Changes in This Privacy Policy

We reserve the right to modify or amend this policy at any time by posting the revised privacy policy on our website. If there are changes or additions to this Policy, we will post those changes here or in other formats for you to review. Each version of this Policy will be identified at the top of the page by its effective date. Your continued use of the Service after the effective date of any modification to the Privacy Policy will be deemed to be your agreement to any changed terms.

Acceptance of This Privacy Policy

By using this Service, you consent to the collection and use of your Personal Information by Poodll in accordance with this Policy.