

Satisfly Ltd Privacy Policy

Last updated: 14.11.2024

Satisfly respects your right to privacy. This privacy policy (“**Privacy Policy**”) explains who we are, how we collect, share and use information about you and how you can exercise your privacy rights. Our Privacy Policy applies to all users of Satisfly website and services, including but not limited to <https://platform.satisfly.com>, <https://www.satisfly.com> (or <https://satisfly.com>) (depending on your use, the “**Site**” and/or the “**Service**”). For further information on the terms which govern your use of the respective Service, please see <https://.....com/terms> or any service order you may have signed with us.

1. What does Satisfly do?

If you have any questions or concerns about our use of your information, then please contact us using the contact details provided in the “[How to Contact Us](#)” section of this Privacy Policy. Satisfly is a platform that empowers businesses to effectively manage their online reputation and customer engagement through advanced features and integrations, headquartered in Bulgaria. We are a provider of software for social media management, social analytics and social listening. For more information about Satisfly, please see the “**About Us**” section of our Site at [Satisfly.com](https://satisfly.com).

2. Information Collected

We collect information about visitors to our Site, our customers and their users of the Service, job applicants, and users of our customers’ social media pages / properties. Such information is collected from the following sources:

- **Information We Collect Directly from You:** The type of information that we collect directly from you varies based on your interaction with our Site and our Service. For example, we collect information directly from you when you register an account with us, liaise with us on a customer service issue, apply for a job, and complete an application or other forms on the Site and/or Service. We also collect information that you send us via any medium, including, but not limited to email address and phone number. In addition, we collect information about you from your social media interactions on third party social media properties, such as your social media handle, username, profile, postings, and messages you exchange with our customers.
- **Information We Receive from Customers:** We receive information from customers in order to provide our Service. Such information may include a user’s social media handle, username, profile picture or may include biography, follower counts, website URL, first and last name (if provided by user), and messages or communications with our customers. We collect information from individuals employed by our customers such as their contact information in order to provide our Service.

3. Information Collected Automatically

When you visit our Site or use our Service, we may collect certain information automatically from your device. This information may be considered personal information under applicable data protection laws. Specifically, the information we collect automatically

may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location), third party webpages accessed via the Service and other technical information. We may also collect information about how your device has interacted with our Site (including the pages accessed and links clicked) or Service (including content accessed). Collecting this information enables us to better understand the visitors who come to our Site or use our Service, where they come from, and what content and functionality is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our Site and/or Service to our visitors and users. Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading "[Cookies, similar tracking technology, and analytics](#)" below.

4. Information from Other Sources

We also collect information from other sources. The following are the categories of sources we collect information from:

- Data brokers or resellers from which we purchase data to verify and supplement the data we collect.
- Social networks when you engage with our content, reference our Site or Service, or grant us permission to access information from the social networks.
- Partners that offer co-branded services, sell or distribute our products, or engage in joint marketing activities.
- Customers that provide us with information which we process as a service provider.

5. Do-Not-Track

Your browser settings may allow you to automatically transmit a "Do Not Track" signal to online services you visit. Note, however, there is no industry consensus as to what site and app operators should do with regard to these signals. Accordingly, unless and until the law is interpreted to require us to do so, our systems do not recognize browser "do-not-track" requests. You may, however, disable certain tracking as discussed in this Privacy Policy (e.g., by disabling cookies, or using private browsing modes).

6. Use of Information

Satisfy processes information for business and commercial purposes in accordance with the practices described in this Privacy Policy. Our business purposes for collecting and using information, including in the last 12 months, include the following:

- Operate and improve the Site and Service;
- Provide users or customers with the Service and other products and services that a user or customer may request or that a user or customer has expressed interest in;
- Facilitate subscription processing, reviews and analysis;
- Evaluate user interest and needs in order to improve the Service and make available other offers, products or services;
- Record calls with customers for quality, training and Service improvement purposes (upon receipt of consent where required by applicable law);
- Evaluate the types of offers, products or services we make available to users or customers and potential users or customers;
- Monitor use of the Service, including for troubleshooting and product improvement purposes;

- Provide customer support;
- Communicate and provide additional information that may be of interest to users through email or other means, such as special offers, announcements, and marketing materials;
- Conduct online research surveys regarding the Site and/or Service;
- Combine datasets to create aggregated data for internal evaluation and analysis;
- Share anonymized or personalized tokens across the Satisfy platform in order to provide the Service;
- Send you reminders, technical notices, updates, product announcements, security alerts and support and administrative messages, service bulletins, or marketing;
- Provide advertisements to you through email messages;
- As necessary to consider your job application for open positions, process your employment and education history, transcript, writing samples, and references;
- Manage our everyday business needs such as Site and/or Service administration, forum management, fulfillment, analytics, fraud prevention, enforcement of our corporate reporting obligations, legal terms and any other contractual agreement relating to our Service or to comply with the law; and
- Fulfill any other business or commercial purposes at your direction or with your notice and/or consent.

Notwithstanding the above, we may use information that does not identify you (including information that has been aggregated or de-identified) for any purpose except as prohibited by applicable law. For information on your rights and choices regarding how we use information about you, please see "[Your Data Protection Rights](#)" below.

7. Categories of Third Parties With Whom We May Share Your Information

We share information we collect in accordance with the practices described in this Privacy Policy. The following are the categories of recipients:

- to our affiliates, service providers and partners who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Site or Service), or who otherwise process information for purposes that are described in this Privacy Policy or for which we provide you notice when we collect your information. We share information with our affiliates for business and commercial purposes. We contractually prohibit our service providers from retaining, using, or disclosing information about you for any purpose other than performing the services for us, although we may permit them to use information that does not identify you (including information that has been aggregated or de-identified) for any purpose except as prohibited by applicable law.
- to our customers (including information pertaining to customer end-users as well as internal personnel) in order to effectively provide our social media management, social analytics and social listening services and to manage the customer relationship. For example, we share information with our customers in order to facilitate the processing of their orders, maintain and administer their online accounts, respond to their questions and comments, comply with their requests, market and advertise to them and otherwise comply with our contractual obligations and with applicable law;
- to local information technology resellers in certain countries where permitted by applicable law. We may provide contact information of customers / potential customers to such reseller to market our Service.
- to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of

- applicable law or court order or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- to a potential buyer (and its agents, investors, and/or advisors) in connection with any proposed or actual purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your information only for the purposes disclosed in this Privacy Policy;
 - to vendors for business and commercial purposes, including analytics and advertising technology companies. Vendors may act as our service providers, or in certain contexts, independently decide how to process your information. For more information on advertising and analytics, see the "[Cookies, similar tracking technology, and analytics](#)" section below;
 - to any other person with notice to you and your consent to the disclosure;
 - when you voluntarily enter a sweepstakes, contest, or other promotion, we share information as set out in the official rules that govern the promotion as well as for administrative purposes and as required by law (e.g., on a winners list). By entering a promotion, you agree to the official rules that govern that promotion, and may, except where prohibited by applicable law, allow the sponsor and/or other entities to use your name, voice and/or likeness in advertising or marketing materials;
 - when you make information public through the Site or Service, such as information in your profile or that you post or comment on public boards, including through social media, your information is publicly viewable. Please think carefully before making information public as you are solely responsible for any information you make public. Once you have posted information, you may not be able to edit or delete such information, subject to additional rights set out in the "[Your Data Protection Rights](#)" section below; and
 - when you request or direct us to share information, such as when you choose to share information with a social network or other third party platform about your activities on the Service, which may require you to accept such third party's terms of use or privacy policy.

Please note the Service uses Google Profile API as a service provider, and if you use these services through the Service, you are subject to the Google Privacy Policy, located at <https://policies.google.com/privacy>. Notwithstanding the above, we may share information that does not identify you (including information that has been aggregated or de-identified) except as prohibited by applicable law. For information on your rights and choices regarding how we share information about you, please see the "[Your Data Protection Rights](#)" section below. In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

8. Data Retention

We retain information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your information, we will either delete or anonymize it in accordance with our data retention policy, or, in the limited circumstances where this is not possible (for example, because your information has been stored in backup archives), then we will securely store your information and isolate it from any further processing until deletion is possible.

9. Sensitive personal information

The terms that govern your use of the Service prohibit you from providing Satisfy with sensitive personal information as that term is defined under applicable law.

10. Legal basis for processing personal data (EEA or UK visitors / users only)

If you are a visitor or user from the European Economic Area or the UK, our legal basis for collecting and using the personal data described above will depend on the personal data concerned and the specific context in which we collect it.

However, we will normally collect personal data from you only where we have your consent to do so, where we need the personal data to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal data from you.

If we ask you to provide personal data to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal data is mandatory or not (as well as of the possible consequences if you do not provide your personal data).

Similarly, if we collect and use your personal data in reliance of our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal data, please contact us using the contact details provided under the "[How to Contact Us](#)" heading below.

11. Cookies, similar tracking technology, and analytics

We use cookies and similar tracking technology (collectively, "**Cookies**") to collect and use information about you, including to serve interest-based advertising. For further information about the types of Cookies we use, why, and how you can control Cookies, please see our **Cookie Policy**.

We also use analytics services, such as Google Analytics, to help us understand how users access and use the Service. In addition, we also use audience matching services to reach people (or people similar to people) who have visited our Service or are identified in one or more of our databases ("**Matched Ads**"). This is done by us uploading a customer list to a technology service or incorporating a pixel from a technology service into our own Service, and the technology service matching common factors between our data and their data. For instance, we incorporate the Facebook pixel on our Service and may share your email address with Facebook as part of our use of Facebook Custom Audiences.

Google provides tools to allow you to opt out of the use of certain information collected by Google Analytics at <https://tools.google.com/dlpage/gaoptout> and by Google Analytics for Display Advertising or the Google Display Network at <https://www.google.com/settings/ads/onweb/>.

As indicated above, vendors may act as our service providers, or in certain contexts, independently decide how to process your information. We encourage you to familiarize yourself with and consult their privacy policies and terms of use.

12. Social Media and Technology Integrations

We offer parts of our Service through websites, platforms, and services operated or controlled by separate entities. In addition, we integrate technologies operated or controlled by separate entities into parts of our Site and Service. Some examples include:

- **Links.** Our Site and Service includes links that hyperlink to websites, platforms, and other services not operated or controlled by us.
- **Liking, Sharing, and Logging-In.** We may embed a pixel or SDK on our Site or Service that allows you to “like” or “share” content on, or log-in to your account through social media. If you choose to engage with such integration, we may receive information from the social network that you have authorized to share with us. Please note that the social network may independently collect information about you through the integration.
- **Brand Pages and Chatbots.** We may offer our content through social media. Any information you provide to us when you engage with our content (such as through our brand page or via our chatbot on the Site or Service) is treated in accordance with this Privacy Policy. Also, if you publicly reference our Service on social media (e.g., by using a hashtag associated with Satisfly in a tweet or post), we may use your reference on or in connection with our Site or Service.

Please note that when you interact with other entities, including when you leave our Site or Service, those entities may independently collect information about you and solicit information from you. The information collected and stored by those entities remains subject to their own policies, terms, and practices, including what information they share with us, your rights and choices on their services and devices, and whether they store information in the U.S. or elsewhere. We encourage you to familiarize yourself with and consult their privacy policies and terms of use.

13. Your Data Protection Rights

You have the following data protection rights:

- If you wish to access, correct, update or request deletion of your information, you can do so at any time by contacting us using the contact details provided under the “[How to Contact Us](#)” heading below. Note that if you submit a request to delete your information, this may prohibit you from using the Site and/or Service. If you have authorized us to access your data via the Google Profile API, then in addition to our normal procedure for deleting stored data, you may revoke our access to your data via the Google security settings page, located at <https://security.google.com/settings/security/permissions>.
- In addition, if you are a resident of the European Economic Area or the United Kingdom, you can object to processing of your personal data, ask us to restrict processing of your personal data, or request portability of your personal data. Again, you can exercise these rights by contacting us using the contact details provided under the “[How to Contact Us](#)” heading below. Note that if you submit such a request, this may prohibit you from using the Site and/or Service.
- You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in

the marketing emails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the "[How to Contact Us](#)" heading below. Please note that your opt out is limited to the email address, device, and phone number used and will not affect subsequent subscriptions.

- Similarly, if we have collected and processed your information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your information conducted in reliance on lawful processing grounds other than consent.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. Where we process your information solely on behalf of a customer, we may be legally required to forward your request directly to our customer and/or social media business partners for their review / handling.

14. Security & User ID/Password

Our Site and/or Service implements and maintains various reasonable and appropriate administrative, physical, and technical security safeguards to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. These security safeguards include, but are not limited to, network and host security controls (e.g., firewalls, intrusion detection systems, etc.), data encryption (both at rest and during transmission), and operating procedures that are designed to protect your information. You should protect your user ID and password and NOT share it with anyone. Additionally, we recommend enabling two-step verification or SSO integration where available. If you believe your user ID and password have been compromised or you have trouble changing your user ID/password on the Site or Service, please contact our technical support department (support@satisly.com). Nevertheless, transmission via the internet is not completely secure and we cannot guarantee the security of information about you.

15. International Transfers

Your information may be transferred to, and processed in, countries other than the country in which you are resident. For example, if you are a resident of Canada, your personal information may be transferred to the United States for processing. These countries may have data protection laws that are different to the laws of your country.

Specifically, our servers are located in the United States, and our group companies and third party service providers and partners operate around the world. This means that when we collect your information we may process it in any of these countries.

However, we have taken appropriate safeguards to ensure that your information will remain protected in accordance with this Privacy Policy and applicable legal requirements. These include our use of European Commission-approved Standard Contractual Clauses (along with the UK Addendum, where appropriate) and, as applicable, our commitment (and commitments made by third party transferees) to honor the principles set forth in the Data Privacy Frameworks (defined below), to the extent each such Data Privacy Framework is accepted as a lawful mechanism under which personal data can transfer in compliance with applicable laws.

16. Transfers Outside the EEA

All entities to which Satisfly provides personal data comply with the requirements of Regulation 2016/679 and applicable written agreements, annexes, and contracts concluded with Satisfly in relation to the processing of personal data. They are obligated to take appropriate technical and organizational measures to protect personal data.

Satisfly undertakes not to transfer your personal data to third parties outside the EU or to an international organization without obtaining your prior consent.

Satisfly deems it necessary to inform you that for the purposes of processing your personal data, we use information systems to organize databases, and the maintenance and IT support of applications related to these systems are provided by third (external) parties.

17. Contacting Us, Complaints and Dispute Resolution

You have the right to file a complaint with the supervisory authority – You have the right to file a complaint directly with the supervisory authority in the Republic of Bulgaria – the Commission for Personal Data Protection, address: Sofia 1592, Prof. Tsvetan Lazarov Blvd. No. 2 (www.cpdp.bg), or with the supervisory authority in the Member State of your usual residence, place of work, or place of the alleged infringement, if you believe that the processing of your personal data violates the provisions of Regulation (EU) 2016/679. If you wish to file a complaint regarding the processing of your personal data by Satisfly you can do so using the contact details provided by Satisfly.

18. Children

This Service is intended for a general audience and is not directed at children under sixteen (16) years of age.

Consistent with the Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR), we do not knowingly request personal information from anyone under the age of 16 without requiring parental consent. Any person who provides their personal information to us through our Site or Service represents that they are at least 16 years of age. If you are a parent or guardian and you believe we have collected information from your child in a manner not permitted by law, contact us at data@satisfly.com. We will remove the data to the extent required by applicable laws.

19. Updates to this Privacy Policy

We may update this Privacy Policy from time to time in response to changing legal, technical or business developments. When we update our Privacy Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Policy changes if and where this is required by applicable data protection laws.

You can see when this Privacy Policy was last updated by checking the “last updated” date displayed at the top of this Privacy Policy.

20. How to Contact Us

If you have any questions about this Privacy Policy or our privacy practices, please contact us at **contact@satisfly.com**.

If you have a disability and would like to access this Privacy Policy in an alternative format, please contact us at **contact@satisfly.com**.