

# Xiaa Partner Sales



## Privacy Policy

### Definitions

Throughout this Privacy Policy we'll refer to our website and other Vendor products and services collectively as "Products and Services".

"Personal Information" refers to information on the users of our Products and Services including user name, address, email, phone number, location, id card, credit card details and other similar data.

This Privacy Policy does not apply to any of our Products and Services that have a separate privacy policy.

### Principles

Our general principles are:

- We do not seek to actively collect your Personal Information via our Applications and Website, other than Public Data that may be found on public social networking profiles ("Public Data"). This data may include name, job title, organization, business telephone and email information and may be processed for the purposes of offering, marketing and selling relevant goods and/or services to Your employer as allowed under current regulation.
- When we do receive your Personal Information (for example, by you contacting us via the contact page on our website) we are thoughtful about the information we ask you to provide and the information that we collect about you through the operation of our Products and Services.
- We store Personal Information for only as long as we have a reason to keep it.
- We aim for full transparency on how we gather, use, and share your Personal Information.

### Information We Collect

**Information you provide:** The only place we ask for your Personal Information directly is on the contact form on our website.

You are not required to register and login to the website. When you email us via the contact form then we will only use the information provided to respond directly to your message.

**Web Site Log Information:** Like most online sites, we collect information that web browsers, mobile devices, and servers typically make available, such as the browser type, IP address, unique device identifiers, language preference, referring site, the date and time of access, operating system, and mobile network information.

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**Location Information:** When you access our website we may determine the approximate location of your device from your IP address. We collect and use this information to, for example, calculate how many people visit our Services from certain geographic regions. Our mobile applications may require location information to offer their service; we do not report such information to our servers.

**Information collected from other sources:** We may also receive information about you from other sources, such as Public Information on social websites.

**Ads and Analytic Services Provided by Others:** Ads appearing on any of our Products and Services may be delivered by advertising networks. Other parties may also provide analytic services via our Products and Services.

These ad networks and analytics providers may set tracking technologies (like cookies) to collect information about your use of our Products and Services and across other websites and online services.

These technologies allow these third parties to recognize your device to compile information about you or others who use your device. This information allows us and other companies to, among other things, analyze and track usage, determine the popularity of certain content, and deliver advertisements that may be more targeted to your interests.

Please note this Privacy Policy only covers the collection of information that we directly collect and does not cover the collection of information by any third-party advertisers or analytics providers.

## How We Use Information

We use information about you as mentioned above and as follows:

- To further develop and deliver our Products and Services.
- To monitor and analyze trends and better understand how users interact with our Products and Services, which helps us improve our Products and Services and make them easier to use.
- To monitor and protect the security of our Products and Services, detect and prevent fraudulent transactions and other illegal activities, fight spam, and protect our rights and property.
- To market and sell relevant goods and/or services to Your employer as allowed under current regulation.

## Sharing Information

We share information about you in the limited circumstances spelled out below and with appropriate safeguards on your privacy:

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- **Subsidiaries, Employees, and Independent Contractors:** We may disclose information about you to our subsidiaries, our employees, and individuals who are our independent contractors that need to know the information in order to help us provide our Products and Services, or to process the information on our behalf. We require our subsidiaries, employees, and independent contractors to follow this Privacy Policy for Personal Information that we share with them.
- **Third Party Vendors:** We may share information about you with third party vendors who need to know information about you in order to provide their services to us. This group includes vendors that help us provide and enhance our Products and Services to (like analytic providers). We require vendors to agree to privacy commitments in order to share information with them.
- **As Required by Law:** We may disclose information about you in response to a subpoena, court order, or other governmental request.
- **To Protect Rights and Property:** We may disclose information when we believe in good faith that disclosure is reasonably necessary to protect our, third party or public property or rights. For example, if we have a good faith belief that there is an imminent danger of death or serious physical injury, we may disclose information related to the emergency without delay.
- **Business Transfers:** In connection with any merger, sale of company assets, or acquisition of all or a portion of our business by another company user information would likely be one of the assets that is transferred or acquired by a third party. If any of these events were to happen, this Privacy Policy would continue to apply to your information and the party receiving your information may continue to use your information, but only consistent with this Privacy Policy.
- **With Your Consent:** We may share and disclose information with your consent or at your direction.
- **Aggregated and De-Identified Information:** We may share information that has been aggregated or reasonably de-identified, so that the information could not reasonably be used to identify you. For instance, we may publish aggregate statistics about the use of our Products and Services.
- **Published Support Requests:** If you send us a request (for example, via a support email or one of our feedback mechanisms), we reserve the right to publish that request in order to help us clarify or respond to your request or to help us support other users.

## Transferring Information

By accessing or using the Services or otherwise providing information to us, you consent to the processing, transfer, and storage of information in a country of our choice, which may have rights and protections that are different from those in your home country.

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## Privacy Policy Changes

We reserve the right to amend this Privacy Policy from time to time at our sole discretion and publish the changed version on our web site. If we make changes, we will notify you by revising the change log below.

In some cases we may provide additional notice (such as adding a statement to our homepage or sending you a notification through e-mail ).

Your continued use of the Services after any change in this Privacy Policy will constitute your consent to such change.

*21 September 2018: First version.*

*20 January 2020: Version 1.1.*