



# Privacy policy



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Factory of innovations and solutions, LLC., together with its subsidiaries ("ALIRA LLC") has created this Privacy Policy in line with ALIRA's commitment to your privacy on Innowise websites and marketing initiatives. The following discloses Innowise's information gathering, dissemination and protection practices.

## Compliance

If you do not agree to the terms of this Privacy Policy, please do not access or use ALIRA LLC websites. If you wish to stop receiving ALIRA LLC marketing materials then please click on the following link to unsubscribe.

## Collection of information

ALIRA LLC collects information to provide better services to its users and to better understand the visitors to its websites and what content is of interest to them. ALIRA collects information in the following ways:

- information you affirmatively choose to submit to us (such as your name, email address, company name, title, country) for the purpose of accessing various downloads, viewing specific content, subscribing to ALIRA LLC newsletters, registering for events and your preferences in receiving marketing from ALIRA LLC and its third party partners and your communication preferences, etc. Information we have obtained about you from publicly available sources such as social media, marketing platforms or on events, you attended. You will receive marketing communications from ALIRA LLC if you have requested information from ALIRA LLC or you or your employer has purchased services from ALIRA LLC;
- information ALIRA LLC receives from your use of ALIRA LLC websites, such as the IP address, browser type, ISP, referring/exit pages, platform type, date/time stamp, number of clicks, domain name and country/state of all visitors to ALIRA's websites;
- location information when you use ALIRA's websites as ALIRA LLC may collect and process information about your location. ALIRA LLC use various technologies and tools to determine location;

- information that is considered aggregated data such as statistical or demographic data which Innowise may use for any purpose. Aggregated data may be derived from your personal information but is not considered personal information in law as it does not directly or indirectly reveal your identity, unless Innowise combines or connects aggregated data with your personal information so that it can directly or indirectly identify you;
- ALIRA LLC collects technical data from various third parties and public sources as, such as:
  - analytics providers
  - advertising networks
  - search information providers

Other than as required by law, ALIRA LLC websites do not collect any special categories of personal information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). ALIRA LLC will not collect any information about criminal convictions and offences.

ALIRA LLC will only use your personal information for the purposes for which it was collected, unless it reasonably considers that it needs to use it for another reason that is compatible with the original purpose. If ALIRA LLC needs to use your personal information for an unrelated purpose, ALIRA LLC will notify you and explain the legal basis which allows ALIRA LLC to do so.

## Sharing of information

ALIRA LLC may disclose your personal information to the following categories of recipients:

- to its **group companies, professional advisers, third party services providers and partners** who provide data processing services to ALIRA LLC (for example, to support the delivery of, provide functionality on, or help to enhance the security of Innowise websites), or who otherwise process personal information for purposes that are described in Privacy

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Notices or notified to you when ALIRA LLC collects your personal information. A list of ALIRA's current group companies is available upon request.

- to any **competent law enforcement body, regulatory, government agency, court or other third party** where Innowise believes disclosure is necessary (a) as a matter of applicable law or regulation, (b) to exercise, establish or defend its legal rights, or (c) to protect your vital interests or those of any other person.
- to any **other person with your consent** to the disclosure.

## Legal basis of processing

If your personal information is protected by EU data protection law, ALIRA's legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which Innowise collects it.

However, ALIRA LLC will normally collect personal information from you only (a) where it needs the personal information to perform a contract with you, (b) where the processing is in its legitimate interests and is not overridden by your rights, or (c) where it has your consent to do so. In some cases, ALIRA LLC may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

If you have questions about or need further information concerning the legal basis on which Innowise collects and uses your personal information, please contact Innowise using the contact details provided under the "Contact Details" heading below.

## Use of information

Any information collected by Innowise will be done in accordance with this Privacy Policy for the purposes of making better business decisions, supporting the activities you choose to engage in, and providing higher quality solutions and services to ALIRA's customers. ALIRA LLC uses your location information to tailor your experience with Innowise websites. It may also use any non-personal information collected to enhance ALIRA LLC

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websites, and your IP address for website diagnostics and administration. ALIRA LLC will only retain your personal information for as long as necessary to fulfil the purposes it was collected for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, ALIRA LLC considers the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which Innowise processes your personal information and whether it can achieve those purposes through other means, and the applicable legal requirements.

## International transfers

ALIRA LLC processes information on servers in many countries around the world and you consent to your personal information being processed on a server located outside the country in which you reside. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective). However, ALIRA LLC has taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Policy, including, utilizing the European Commission's Standard Contractual Clauses for transfers of personal information between its group companies, which requires all group companies to protect personal information being processed from the European Economic Area to an equivalent standard to that required under European Union data protection law.

## Information security

ALIRA LLC protects your personal information in the same way that it protects its other confidential information, such as storing it on secure servers that only select Innowise personnel have access to, and by encrypting it to help prevent access by any unauthorized parties. ALIRA LLC has put in place procedures to deal with any personal information breach and will notify you and any applicable regulator of a breach when legally required to do so.

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## Marketing

As explained above, ALIRA LLC will collect and use your personal data for marketing purposes. Your data will be stored in our CRM system. We will use your data to inform you about ALIRA LLC products and services we think may be of your interest and sending you our newsletters. For statistical purposes, we will collect information about your response to our emails and our interaction with you to make decisions on future marketing. If you wish to stop that we collect and use this information please click [here](#).

## Links

ALIRA LLC websites contain links, plug-ins and applications to various third party websites. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. ALIRA LLC has no control over, and is not responsible for the content, privacy policies or reliability of such third party connections. When you leave ALIRA's website, ALIRA LLC encourages you to read the privacy notice and privacy policy of every website you visit.

## Your data protection rights

If your personal information is protected by EU data protection law, you have the following data protection rights which you may be able to exercise by contacting Innowise using the contact details provided under the "Contact Details" heading below:

- If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by contacting ALIRA LLC.
- In addition, you can **object to processing** of your personal information, ask ALIRA LLC to **restrict processing** of your personal information or **request portability** of your personal information by contacting ALIRA LLC.
- You have the right to **opt-out of marketing communications** that ALIRA LLC sends you at any time. You can exercise this right by clicking on the

“unsubscribe” or “opt-out” link in the marketing emails ALIRA LLC sends you or by using the relevant opt-out mechanism for non-email based marketing.

- Similarly, if ALIRA LLC has collected and processes your personal information based on your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing ALIRA LLC conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- Similarly, if ALIRA LLC has collected and processes your personal information based on your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing ALIRA LLC conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a data protection authority** about ALIRA’s collection and use of your personal information. For more information, please contact your local data protection authority.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, ALIRA LLC may charge a reasonable fee or refuse to comply with your request if your request is clearly unfounded, repetitive or excessive. ALIRA LLC tries to respond to all legitimate requests within one month. Occasionally, it may take longer if your request is particularly complex or you have made a number of requests. In this case, ALIRA LLC will notify you and keep you updated.

## Cookies Policy

When you visit the Innowise Sites, Innowise uses a number of suppliers who may place cookies, tags, pixels, and similar tracking technologies (collectively, “Cookies”) on your device, browser, or the webpage you are viewing, in order to personalize your experience (e.g., language preferences), understand usage patterns, provide, improve and secure the Innowise Sites.

Innowise Sites use different types of Cookies for different reasons, as follows:



- **Absolutely Necessary Cookies:** These Cookies are essential to enable you to move around ALIRA LLC Sites and use its features. Without these Cookies, services you have asked for, like adding items to an online shopping cart, cannot be provided.
- **Performance Cookies:** These Cookies collect information about how you use ALIRA LLC Sites. Information collected includes, for example, browsers and operating systems used, domain name of the website previously visited, number of visits, average duration of visit, and pages viewed. These Cookies do not collect information that personally identifies you and considered aggregated data. Performance Cookies are used to improve the user-friendliness of a website and enhance your experience.
- **Functionality Cookies:** These Cookies allow the website to remember choices you make (such as your username or ID, language preference, or the area or region you are in) and provide enhanced, more personal features. These Cookies can also be used to remember changes you have made to text size, fonts, and other customizable parts of web pages. They may also be used to provide services you have asked for, such as watching a video or commenting on a blog. The information these Cookies collect may be anonymized, and they cannot track your browsing activity on other websites.

ALIRA LLC may also allow third party service performance and retargeting Cookies, such as the Google Analytics, Google reCAPTCHA, Yandex Metrica, LinkedIn Insight Tag, Google AdWords, Facebook Pixel, Amplitude, Hotjar, Visitor Queue, Marketo Munchkin, etc., to collect information about your online activities on the Innwise Sites and across unaffiliated websites you may visit. This information is used to provide ads tailored to your interests (behavioral advertising), and to collect information to help track and manage the effectiveness of the ads and number of visitors. This means ALIRA LLC may show ads based on your past visits to ALIRA LLC Sites, through publishing networks, such as the Google Content Network (GCN). More information about these Cookies may be available on the relevant third party's website.

If you do not agree to certain uses of Cookies detailed above, you can exercise certain choices through your browser settings or by not using the ALIRA LLC Sites. If you choose to reject cookies via your browser settings, you may still use ALIRA LLC Sites though your access to some functionality and areas may be restricted. As the means by which you can refuse cookies through your web browser controls vary from browser-to-browser, you should visit your browser's help menu for more information.

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You may also learn more about and opt-out of certain tailored ads (behavioral advertising) by visiting the [Digital Advertising Alliance-US](#), [Network Advertising Initiative](#), [Digital Advertising Alliance-Canada](#), [European Interactive Digital Advertising Alliance](#), [www.aboutcookies.org](http://www.aboutcookies.org), [www.allaboutcookies.org](http://www.allaboutcookies.org) or your device settings for our mobile app. You may also edit or opt-out of your Google Display Network ads' preferences at <http://www.google.com/settings/ads/>.

Do-Not Track: At this time, Innowise Sites are not configured to honor browsers' "Do Not Track" signals.

If you have any questions about this Cookie Policy, please use contact Innowise using the contact details below.

## Changes to the policy

ALIRA LLC reserves the right to modify or amend this Privacy Policy at its own discretion from time to time. The changes can be viewed here or elsewhere on Innowise websites. Your continued use of Innowise websites constitutes your acceptance of those changes.

This version was last updated on 28 October 2021 and historic versions can be obtained by contacting ALIRA LLC.

## Contact details

It is important that the personal information ALIRA LLC holds about you is accurate and current. Please keep ALIRA LLC informed if your personal information changes during your relationship with ALIRA LLC. Additionally, if you have any questions about this Privacy Policy, the practices of ALIRA LLC websites or your interaction with ALIRS LLC via ALIRA LLC websites, please contact:

**ALIRA LLC** | [irina.sharipova@alira.io](mailto:irina.sharipova@alira.io)