



[上次更新日期： 22/02/2023]

# 隱私權通知

上次更新日期: [22/02/2023]

*\*If there is any inconsistency or difference in the interpretation between this language version and the English language version of this Privacy Notice, the English language version shall prevail.*

此為 Infobip Limited 及其子公司和關係企業的隱私權通知。在 Infobip，無論我們的營運地點位於何處，我們的目標是以正確的方式保護隱私權。我們相信，以負責的態度使用個人資料可以支援業務成長，並且在合作夥伴、消費者和品牌之間建立起牢固的關係。作為一家企業，我們致力於尊重和保護與我們互動的所有個人的隱私。

對於我們而言，如何讓我們所收集的關於您的個人資料、我們使用這些資料的方式，以及我們會將這些資料與誰分享等資訊維持公開透明是非常重要的。這正是本隱私權通知（包括附錄 1）所包含的內容。為方便瀏覽，本通知分為幾個部分。除了本隱私權通知外，我們有時還會在適當的情況下為您提供額外的即時隱私權資訊。

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## 1. 定義

我們在本通知中使用以下定義：

- 「Infobip」或「我們」或「我們的」一詞係指 Infobip Limited 公司及其子公司和關係企業。有時，我們也可能使用「Infobip 集團」一詞指稱 Infobip Limited 及其子公司和關係企業。
- 「您」一詞係指 Infobip 收集和處理其個人資料的自然人（個人）。
- 「服務」一詞係指 Infobip 基於雲端的通訊（CPaaS - 通訊平台即服務，以及 SaaS - 軟體即服務）和其他產品與服務。
- 「個人資料」一詞係指可以直接或間接識別您身分的任何資訊。
- 「控制者」一詞係指確定資料處理目的和方式，並負責以符合適用隱私權法的方式處理此類資料的組織。
- 「處理者」一詞係指代表控制者處理個人資料的組織。
- 「適用隱私權法」一詞係指適用於處理給定個人資料的所有法律和法規（例如《一般資料保護規範》(EU) 2016/679、英國 GDPR 或英國《2018年資料保護法》）。有關更多資訊，請參閱特定國家/地區的附錄。

## 2. 關於 INFOBIP 服務

Infobip 是一個通訊平台即服務 (CPaaS) 以及軟體即服務 (SaaS) 提供商。在為我們的客戶提供服務時，我們會依據情況擔任控制者或處理者。

### *我們在作為處理者時的活動*

我們的客戶主要是透過自己的軟體應用程式（透過 API）或使用我們的 Web 介面 Infobip Portal 將我們的服務整合到其業務經營中的公司。藉由使用我們的雲端通訊平台，我們的客戶能夠使用不同的通訊管道（簡訊、電子郵件、語音等）向最終使用者傳送通訊或是與其交換通訊。我們與客戶的最終使用者沒有直接關係，因此我們透過電信業者和其他通訊提供商分發這些通訊。當我們這樣做時，我們代表我們的客戶作為處理者，並且處理相關資料的唯一目的是向他們提供我們的服務。我們會在限定範圍內，依據客戶的指示並遵守服務條款和條件、服務協議或與客戶簽訂的資料處理或類似協議予以處理。

例如，當您（作為我們客戶的最終使用者）是我們的客戶透過利用我們的平台向您傳送通訊（例如簡訊）的接收者時，我們將代表我們的客戶傳送該客戶的通訊。這表示客戶是控制者，而 Infobip 是處理者。我們從客戶的最終使用者處收到的關於他們代表我們客戶所從事活動相關權利的任何請求都將轉發給客戶，或者將要求最終使用者直接與客戶聯絡。

### *我們在作為控制者時的活動*

本隱私權通知描述 Infobip 作為控制者所進行的活動。當我們基於自身目的處理個人資料而非代表他人行事時，Infobip 是控制者。我們致力於按照本隱私權通知中的說明處理此類資料，並尊重適用隱私權法所規定的所有義務。

## 3. 您的個人資料由誰負責？

負責處理本隱私權通知所述的個人資料的主要實體（即控制者）為 Infobip Limited，地址為 35-38 New Bridge Street, Fifth Floor, London EC4V 6BW, United Kingdom，註冊號碼為 7085757。

基於遵守歐盟資料保護法的目的，Infobip Limited 已任命其駐歐盟的資料保護官（「DPO」）作為我們的歐盟代表。我們的 DPO 可透過電子郵件地址 [data-protection-officer@infobip.com](mailto:data-protection-officer@infobip.com) 聯絡。

請注意，依據適用於您的具體合約協議以及給定的處理活動，其他 Infobip 子公司與關係企業可能是您個人資料的控制者。如需查詢所有 Infobip 子公司與關係企業的聯絡詳細資訊，請造訪：<https://www.infobip.com/offices>。

如果您有關於本隱私權通知或是我們隱私權慣例方面的任何疑問，您可以透過以下電子郵件地址與我們的隱私權團隊以及資料保護官員聯絡：[data-protection-officer@infobip.com](mailto:data-protection-officer@infobip.com)。

## 4. 我們如何獲得您的個人資料？

我們處理的大部分個人資料都是由您直接提供給我們的，例如在您使用我們的服務、造訪我們的網站、註冊活動、參與我們的研究計劃、提交申請表或以其他方式與我們溝通時。

我們還會透過其他來源接收個人資訊，例如以下情況：

- 如果您受僱於或代表我們其中一個客戶或供應商，他們可能會向我們提供某些資訊，以便您可以使用我們的服務
- 如果您是我們其中一個客戶的最終使用者，他們可能會向我們提供某些資訊以便能夠使用我們的服務
- 如果您參與我們的市場研究，我們可能會從我們的第三方提供者處收到與此研究相關的資訊
- 如果您造訪我們的網站或使用我們的服務，我們會自動收集某些資訊，例如您的網際網路協議 (IP) 位址、使用者設定、Cookie 識別碼和其他唯一識別碼、瀏覽器或裝置資訊以

及位置資訊（包括自 IP 位址得出的大概位置）。如需瞭解更多有關我們如何透過 Cookie 收集資料的資訊，請瀏覽我們的 [Cookie 政策](#)

- 如果您申請工作，我們可能會從背景調查服務提供者處收到資訊，或者透過 LinkedIn 或其他公開來源或資料強化提供者收集資訊（在當地法律允許的情況下）
- 如果您被我們的求職者指定為推薦人，我們可能會收到某些資訊，以便我們能夠在人員招募過程中與您聯絡。

## 5. 我們會收集哪些個人資料、收集原因以及收集的法律依據、我們如何使用這些資料以及我們會將這些資料保留多久？

### 5.1 我們何時會向客戶提供服務

在本節中，您將找到有關我們向客戶提供服務時處理個人資料的資訊。

本節提供了有關在以下情況時我們會如何處理您資料的詳細資訊：

- 您的身分是作為我們客戶的個人
- 您正在為我們的客戶或代表我們的客戶工作，在此情況下，您是：
  - 「帳戶使用者」（經客戶授權登入其帳戶並使用 Infobip 服務的個人）
  - 「業務聯絡人」（客戶代表或作為客戶與 Infobip 之間聯絡窗口的任何其他個人）
- 是我們客戶的「最終使用者」（從我們的客戶接收通訊或是將通訊傳送給我們客戶的個人）。

#### 5.1.1. 簽訂協議、建立客戶帳戶並提供必要的支援以便讓客戶能夠使用我們的服務

我們會收集哪些個人資料？

Infobip 會收集「帳戶資料」，這是成功維持與客戶業務關係所需的所有資料，例如建立客戶帳戶、允許客戶使用 Infobip 服務或是依此向客戶收費所需的資訊。具體的資料類型包括：

	<ul style="list-style-type: none"> <li>● 客戶和帳戶使用者的註冊詳細資訊（例如姓名、（企業）地址、電話號碼、電子郵件地址、公司名稱和行業、業務角色以及登入詳細資訊）</li> <li>● 客戶的帳單和財務詳細資訊（例如帳單地址、預付費或後付費客戶、銀行帳戶詳細資訊、增值稅號碼、有關信用度和付款行為的資訊，以及適用法律要求的其他附加資訊）</li> <li>● 業務聯絡人的詳細資訊（例如姓名、（企業）地址、電話號碼和電子郵件地址、公司名稱和行業以及業務角色）</li> <li>● 「客戶支援資料」（即客戶支援通訊，包括客戶支援票證的內容）。</li> </ul>
<p><b>我們收集資料的方式為何？</b></p>	<ul style="list-style-type: none"> <li>● 如果您是個人，會直接向您或我們的盡職調查提供者收集。</li> <li>● 如果貴企業是我們的客戶，將會直接向您或貴企業收集。</li> </ul>
<p><b>我們收集資料的原因、收集的法律依據，以及使用資料的方式為何？</b></p>	<p>我們收集與使用帳戶資料以便：</p> <ul style="list-style-type: none"> <li>● 與我們的客戶簽署與管理協議</li> <li>● 建立客戶帳戶，以及讓他們的帳戶使用者能夠使用我們的服務</li> <li>● 確保客戶帳戶的安全，以及提供客戶關懷和支援</li> <li>● 分享有關我們產品和服務的資訊，維護和改善我們與客戶的業務關係，以及行使我們因這些業務關係而產生的權利和履行我們的義務</li> <li>● 透過進行盡職調查，評估我們是否可以與潛在客戶簽訂合約協議。在盡職調查過程中，我們可能會使用您的身分資料。每當進行盡職調查時，我們都會單獨通知您有關處理的準確細節。</li> </ul> <p>就向貴企業提供我們的服務而言，進行這些活動是我們的合法權益。但是，如果您個人是與我們簽訂合約的另一方，我們會處理您的資料，因為這是履行服務協議或在簽訂協議之前依據您的要求提供幫助所必需的。</p>
<p><b>我們會將資料保留多久？</b></p>	<ul style="list-style-type: none"> <li>● 帳戶使用者和業務聯絡人的個人資料會在我們與客戶的業務關係結束後保留十二 (12) 個月。</li> <li>● 我們客戶的個人資料會在我們的業務關係結束後保留七 (7) 年。</li> <li>● 客戶支援資料會在支援請求得到解決後保留七 (7) 年。</li> </ul>

	<p>帳戶資料通常會按照規定的期限保留。但是，在特定情況下，如果當地法律有規定、當局要求或需要捍衛我們的合法權益，我們可能需要將這些資料保留不同的期限。如需瞭解更多詳情，請參閱第 11 節。</p>				
<p>5.1.2. 使得客戶能夠透過我們的服務交換他們的通訊，確保我們網路及服務的安全，同時處理帳單和付款</p>					
<p>我們會收集哪些個人資料？</p>	<p>Infobip 會收集的「通訊相關資料」包括：</p> <ul style="list-style-type: none"> <li>• 「通訊內容」：客戶與其最終使用者之間透過 Infobip 服務進行交換的訊息文字、語音、視訊或音訊媒體、文件或影像</li> <li>• 「流量資料」：為傳輸透過使用我們服務交換的通訊或此通訊相關帳單而處理的資料。此類資料包括有關通訊本身（例如路由、類型、通訊持續期與時間）以及通訊來源與目的地（包括客戶最終使用者的電話號碼或是電子郵件地址，視提供的服務而定）的資訊。</li> </ul> <p>我們也會收集「使用資料」，此類資料為您在使用我們服務期間所產生的資訊，其中包括由應用程式傳送給 Infobip 的資訊（例如 IP 位址、您的使用資訊、路由資訊），以及您在我們平台上的活動記錄。</p>				
<p>我們收集資料的方式為何？</p>	<ul style="list-style-type: none"> <li>• 通訊內容是透過我們的客戶或其最終使用者所收到的。</li> <li>• 客戶最終使用者的電話號碼或電子郵件地址是透過我們的客戶所收到的。其他流量資料是在通訊傳輸過程中自動產生或公開的。</li> <li>• 使用資料是直接向您收集，或是在您使用我們的服務時自動產生的。</li> </ul>				
<p>我們收集資料的原因、收集的法律依據，以及使用資料的方式為何？</p>	<p>通訊內容僅代表特定客戶進行收集和處理。我們將作為處理者並遵照客戶的指示行事。</p> <p>流量資料通常以通訊詳細記錄的形式保存，我們會收集此類資料並將其用於：</p> <table border="1" data-bbox="352 1536 1383 1861"> <tr> <td data-bbox="352 1536 963 1861"> <ul style="list-style-type: none"> <li>• 管理流量，目的是將客戶的通訊傳輸至電信業者和其他通訊提供商或是透過他們進行傳輸，以及處理客戶的查詢。</li> </ul> </td> <td data-bbox="963 1536 1383 1861"> <p>如果您以個人身分作為我們的客戶，則處理您的個人資料對於履行我們的服務協議是必要的。如果我們的客戶是法人，我們將依靠我們的合法權益為我們的客戶提供服務。</p> </td> </tr> <tr> <td data-bbox="352 1861 963 2002"> <ul style="list-style-type: none"> <li>• 排除和偵測網路問題，預防詐騙和其他非法活動，同時確保我們的服務安全。在從事這些活動時，我們也可能會利用帳戶和</li> </ul> </td> <td data-bbox="963 1861 1383 2002"> <p>我們服務的安全性對我們至關重要，因此對於這些活動，我們會依靠自身的合法利益來維</p> </td> </tr> </table>	<ul style="list-style-type: none"> <li>• 管理流量，目的是將客戶的通訊傳輸至電信業者和其他通訊提供商或是透過他們進行傳輸，以及處理客戶的查詢。</li> </ul>	<p>如果您以個人身分作為我們的客戶，則處理您的個人資料對於履行我們的服務協議是必要的。如果我們的客戶是法人，我們將依靠我們的合法權益為我們的客戶提供服務。</p>	<ul style="list-style-type: none"> <li>• 排除和偵測網路問題，預防詐騙和其他非法活動，同時確保我們的服務安全。在從事這些活動時，我們也可能會利用帳戶和</li> </ul>	<p>我們服務的安全性對我們至關重要，因此對於這些活動，我們會依靠自身的合法利益來維</p>
<ul style="list-style-type: none"> <li>• 管理流量，目的是將客戶的通訊傳輸至電信業者和其他通訊提供商或是透過他們進行傳輸，以及處理客戶的查詢。</li> </ul>	<p>如果您以個人身分作為我們的客戶，則處理您的個人資料對於履行我們的服務協議是必要的。如果我們的客戶是法人，我們將依靠我們的合法權益為我們的客戶提供服務。</p>				
<ul style="list-style-type: none"> <li>• 排除和偵測網路問題，預防詐騙和其他非法活動，同時確保我們的服務安全。在從事這些活動時，我們也可能會利用帳戶和</li> </ul>	<p>我們服務的安全性對我們至關重要，因此對於這些活動，我們會依靠自身的合法利益來維</p>				

	<p><b>使用資料。</b> 後者與調查詐騙活動尤為相關，因為它能夠讓我們在發生安全相關事件時構建帳戶使用者活動的時間範圍，並能夠採取適當的緩解措施。</p> <ul style="list-style-type: none"> <li>• 計算費用並與電信業者和其他通訊提供商結算互連費用，或解決與我們客戶或我們通訊提供商的計費糾紛。在某些情況下，我們可能還會將<b>帳戶資料</b>用作此活動的一部分。</li> </ul>	<p>護和提高我們網路和服務的安全性。</p> <p>從事這些活動是我們在處理付款和解決財務糾紛方面的合法權益。</p>
<p>請注意，為履行我們的法律義務，我們可能有義務按照有關執法事項之國家資料保留條款的相關規定保留包含<b>通訊相關資料</b>的記錄，並且依照政府要求分享這些記錄。</p>		
<p><b>我們會將資料保留多久？</b></p>	<ul style="list-style-type: none"> <li>• 通訊內容將代表客戶並依據客戶指示予以保留。</li> <li>• 包含最終使用者個人資料（例如電話號碼或電子郵件地址）的流量資料會在通訊發生當月結束的十二 (12) 個月後自通訊詳細記錄中刪除。</li> <li>• 不包含最終使用者個人資料的其他流量資料（例如時間、類型、通訊持續期間、路由詳細資訊）會在通訊詳細記錄中自通訊年份起最多保留十 (10) 年。</li> <li>• 使用資料最長可保留三 (3) 年。</li> </ul> <p><b>通訊相關資料與使用資料</b>通常會按照規定的期限保存。但是，在特定情況下，如果當地法律有規定、當局要求或需要捍衛我們的合法權益，我們可能需要將這些資料保留不同的期限。如需瞭解更多詳情，請參閱第 11 節。</p>	
<p><b>5.1.3. 為提升我們的產品與服務</b></p>		
<p><b>我們會收集哪些個人資料？</b></p>	<p>Infobip 會收集「<b>行為分析資料</b>」，此資料為您作為我們客戶的帳戶使用者在我們的網站和平台上活動期間所產生的資料（例如，您在我們網路介面內的行為記錄，如花費的時間、瀏覽過的網頁、造訪記錄和使用的功能，以及您的 IP 位址和瀏覽器相關資訊）。</p>	
<p><b>我們收集資料的方式為何？</b></p>	<ul style="list-style-type: none"> <li>• 行為分析資料會直接向您收集，或是在您使用我們的服務時透過在您的瀏覽器上放置 Cookie 和可信任的追蹤技術自動產生。如需深入瞭解有關我們如何在我們的網站透過 Cookie 收集資料的資訊，請造訪我們的 <a href="#">Cookie 政策</a>。</li> </ul>	



<p>我們收集資料的原因、收集的法律依據，以及使用資料的方式為何？</p>	<p>我們收集與使用行為分析資料以便：</p> <ul style="list-style-type: none"> <li>• 深入瞭解我們目前客戶使用我們的平台與服務的方式。具體來說，我們採取部分自動化測量（包括人工介入）來分析您使用我們平台上現有功能和工具的方式，從而為您提供建議以提升您的效能（例如，如何更好地使用某些功能），以及更好地符合我們客戶的業務需求</li> <li>• 建立有關我們工具使用情況的統計資料，以瞭解哪些工具擁有方便使用者的設計，以及哪些工具應該有所加強。</li> </ul> <p>此類活動的整體目標是在與您的最終使用者通訊時，增強您和貴企業的訊息傳遞執行力，我們在進行這些活動時將依靠我們的合法利益。</p>
<p>我們會將資料保留多久？</p>	<p>行為分析資料在產生後最多會保留二十五 (25) 個月。</p>
<p><b>5.2. 您何時提供產品或服務給我們</b></p>	
<p>我們會收集哪些個人資料？</p>	<p>如果您以個人身分作為我們的供應商（也稱為廠商或服務提供者），我們可能會收集：</p> <ul style="list-style-type: none"> <li>• 您的姓名、（公司）地址、電話號碼、電子郵件地址、公司名稱和行業、業務角色以及您的帳單資訊（例如帳單地址、您的增值稅號碼、銀行帳戶詳細資訊，以及我們在法律要求以及遵守適用的國家法律情況下提供的更多資訊）。</li> </ul> <p>在與我們的供應商進行業務往來時，我們還可能會收集：</p> <ul style="list-style-type: none"> <li>• 有關「業務聯絡人」（擔任供應商與 Infobip 之間的聯絡窗口的供應商代表以及其他個人）的個人資料，例如姓名、（公司）地址、電話號碼、電子郵件、公司名稱和行業以及業務角色。</li> </ul>
<p>我們收集資料的方式為何？</p>	<ul style="list-style-type: none"> <li>• 如果您是我們的供應商，將會直接向您收集。</li> <li>• 如果貴企業是我們的供應商，將會直接向您或貴企業收集。</li> </ul>
<p>我們收集資料的原因、收集的法律依據，以及使用資料</p>	<p>我們收集並且會使用此類資料以便：</p> <ul style="list-style-type: none"> <li>• 與您或貴企業簽署並管理協議</li> <li>• 獲取有關您的產品或服務的相關資訊，或是與您分享有關我們業務和服務的相關資訊</li> </ul>

<p>的方式為何？</p>	<ul style="list-style-type: none"> <li>維護和改善我們與您或貴企業的業務關係，以及行使我們因業務關係而產生的權利和履行我們的義務。</li> </ul> <p>進行這些活動是我們透過具有法人性質的供應商購買產品或服務或是與其合作時的合法利益。但是，如果您個人是與我們簽訂合約的另一方，我們會處理您的個人資料，因為這是履行協議或在簽訂協議時所必需的。</p>
<p>我們會將資料保留多久？</p>	<ul style="list-style-type: none"> <li>關於業務聯絡人的個人資料會在我們與供應商的業務關係結束的十二 (12) 個月後刪除。</li> <li>我們供應商的個人資料會在我們業務關係結束的七 (7) 年後刪除。</li> </ul> <p>如果當地特定法律有規定，應有關當局要求，或者在需要捍衛我們合法權利的情況下，我們可能需要將這些資料保留不同於上述時間的期限。如需瞭解更多詳情，請參閱第 11 節。</p>
<p><b>5.3. 當您針對我們的產品和服務與我們聯絡時，以及當我們正在尋找新的商機時</b></p>	
<p>我們會收集哪些個人資料？</p>	<p>我們可能會收集您的姓名、聯絡方式（例如電子郵件地址、電話號碼、國家/地區）和業務詳細資訊（例如公司名稱和行業以及您的業務角色）。我們還將收集您選擇提供給我們的任何其他資訊，具體取決於我們通訊的性質而定。</p>
<p>我們收集資料的方式為何？</p>	<ul style="list-style-type: none"> <li>當您在我們的網站上註冊以瞭解有關我們業務和服務的更多資訊（例如透過「聯絡銷售」表單）、開始透過我們的聊天頻道與我們聊天、採取步驟與我們建立業務關係、提交 Startup Tribe 申請表以及當您向我們提供您的聯絡方式以便請求更多資訊時，會直接向您收集</li> <li>間接透過企業和專業網路與資料庫（例如 LinkedIn）或第三方收集，我們可能會利用其為我們提供從公開來源和資料強化提供者處收集的資訊。我們僅保留有助於我們接觸可能透過我們的服務和產品受益的潛在客戶或供應商的資訊，或者我們是否對他們的產品和服務感興趣的資訊。</li> </ul>
<p>我們收集資料的原因、收集的法律依據，以及使用資料的方式為何？</p>	<p>我們收集與使用此類資料以便：</p> <ul style="list-style-type: none"> <li>無論是透過使用我們的產品和服務，或是透過向我們提供您的產品或服務，與您溝通、回答您的問題，並瞭解您或貴企業是否有興趣與我們進一步合作</li> <li>如果雙方都有興趣簽訂協議，確保在售前和採購過程中提供充分支援。</li> </ul> <p>此類活動代表我們進行業務的合法利益。如果您個人是與我們簽訂合約的另一方，我們會處理您的資料，因為這是履行合約或在簽訂合約時所必需的。</p>

<p>我們會將資料保留多久？</p>	<ul style="list-style-type: none"> <li>除非我們與您或貴企業簽訂商業協議，否則基於此目的收集的個人資料會在我們最後一次通訊的六 (6) 個月後刪除。</li> </ul>
<p><b>5.4. 當我們向您傳送電子郵件或其他行銷通訊時</b></p>	
<p>我們會收集哪些個人資料？</p>	<p>我們會收集您的姓名與聯絡詳細資訊（例如電子郵件地址或電話號碼）。我們還會收集有關電子郵件開啟和點按的簡單統計資料。</p>
<p>我們收集資料的方式為何？</p>	<ul style="list-style-type: none"> <li>如果您透過我們網站上提供的網路表單訂閱接收我們的電子報、部落格或我們的其他行銷通訊，則會直接向您收集</li> <li>如果我們與貴企業目前有維持業務關係，則會直接向您收集或透過貴企業作為企業對企業 (B2B) 行銷的一部分進行收集</li> <li>當您使用我們的電子郵件時，透過行業標準技術會自動產生有關電子郵件開啟和點按的簡單統計資料，例如清晰的 gif。</li> </ul>
<p>我們收集資料的原因、收集的法律依據，以及使用資料的方式為何？</p>	<p>我們收集此類資料的目的是為了：</p> <ul style="list-style-type: none"> <li>告知您有關我們的服務、公司消息、網路研討會以及即將舉行的活動</li> <li>收集統計資料（電子郵件開啟與點按）以協助我們改善直效行銷活動。</li> </ul> <p>如果您訂閱我們的電子郵件行銷通訊，在提交此類網路表單時，我們需要您給予同意。對於 B2B（企業對企業）行銷，我們憑藉我們的合法權益透過電子郵件或其他通訊形式將有關我們的服務、公司消息、網路研討會和即將舉行的活動等訊息告知我們現有的業務合作夥伴（例如客戶和供應商），進而維持並改善我們的業務關係。</p> <p>無論在任何情況下，您都可以使用所有 Infobip 行銷通訊中提供的取消訂閱連結，隨時主動管理您的偏好或選擇退出與 Infobip 的通訊（取消訂閱）。當您取消訂閱我們的行銷通訊（即撤回同意或反對處理）時，我們將停止向您傳送任何行銷資料。</p> <p>但是，我們保留了一份所謂的「禁止清單」，清單中僅包含您的電子郵件地址或電話號碼，以確保我們日後不會向您傳送不需要的內容。我們依據我們的合法權益保留此類資訊，以尊重我們電子報收件人的選擇。</p>
<p>我們會將資料</p>	<ul style="list-style-type: none"> <li>除非您表示反對，否則在您或貴企業與我們建立業務關係期間，我們會保留您的個人資料（姓名、聯絡方式）並用於我們的行銷活動 (B2B)。</li> </ul>

<p>保留多久？</p>	<ul style="list-style-type: none"> <li>如果您直接訂閱，我們則會保留您的個人資料以使用於我們的行銷活動，直到您取消訂閱為止。</li> <li>如果您取消訂閱或反對訂閱，我們只會保留一份包含您聯絡方式（例如電子郵件地址或電話號碼）的禁止清單，以確保您不會收到任何進一步的行銷資訊。</li> </ul>					
<p><b>5.5. 當您註冊、參加我們的網路研討會、商務早餐會報、開發人員聚會或其他活動或是在活動中發言時</b></p>						
<p>我們會收集哪些個人資料？</p>	<p>當您註冊參加我們的商務早餐會報、網路研討會、開發人員聚會或任何其他活動（「活動」）或報到時，我們通常會收集您的姓名、聯絡詳細資訊（例如電子郵件、電話號碼、國家/地區）以及您的業務詳細資訊（例如公司名稱和行業以及您的業務角色）。如果您是以演講者的身分參加，我們可能還會要求您提供簡歷和正式照片。</p> <p>如果是現場活動，我們還可能會詢問您的抵達時間和地點相關資訊，以及您的住宿資料和可能的飲食要求。如果您要求我們向您提供邀請函，或者您需要取得保證函才能獲得簽證，我們將會收集適用法律要求的必要資訊（例如您的姓名、地址、出生日期或護照詳細資訊）。</p> <p>我們可能會從我們的活動中收集照片、音訊和視訊資料。</p> <p>註冊和參加 Infobip Shift 會議時，可能會適用單獨的規則。如需瞭解更多資訊，請檢閱 <a href="#">Infobip Shift 隱私權通知</a>。</p>					
<p>我們收集資料的方式為何？</p>	<ul style="list-style-type: none"> <li>當您註冊參加我們的活動或是在活動中報到時，直接向您收集。</li> <li>有時，貴企業會向我們傳送您的聯絡方式以讓您代表他們參加我們的活動，我們會向您傳送包含註冊連結的邀請函。</li> </ul>					
<p>我們收集資料的原因、收集的法律依據，以及使用資料的方式為何？</p>	<p>我們會在下列情況收集與使用此類資料：</p> <table border="1" data-bbox="352 1473 1385 2029"> <tr> <td data-bbox="352 1473 975 1659"> <ul style="list-style-type: none"> <li>如果您註冊參加網路研討會，我們會提前向您提供網路研討會的詳細資訊，提醒您參加網路研討會並且在隨後透過電子郵件向您傳送網路研討會的錄音。</li> </ul> </td> <td data-bbox="975 1473 1385 1928" rowspan="2"> <p>我們所憑藉的法律依據是您的同意，也就是您透過我們的註冊表提交詳細資訊時所提供的同意。當我們收集有關飲食要求的任何資訊時，我們也會徵求您的同意。</p> </td> </tr> <tr> <td data-bbox="352 1659 975 1928"> <ul style="list-style-type: none"> <li>如果您註冊參加我們的現場活動或在活動中發言，我們會收集資料以確保您在活動中的位置，在您到達前以及活動期間向您傳達所有相關資訊，並且提供活動相關便利安排（例如協助您瞭解活動地點、住宿、旅遊或與活動相關的其他後勤細節）。</li> </ul> </td> </tr> <tr> <td data-bbox="352 1928 975 2029"> <ul style="list-style-type: none"> <li>支援您針對希望參加的活動取得簽證，包括傳送邀請函、支援信函或保證函。</li> </ul> </td> <td data-bbox="975 1928 1385 2029"> <p>我們收集此類資訊只是為了回應您的請求，我們需要您</p> </td> </tr> </table>	<ul style="list-style-type: none"> <li>如果您註冊參加網路研討會，我們會提前向您提供網路研討會的詳細資訊，提醒您參加網路研討會並且在隨後透過電子郵件向您傳送網路研討會的錄音。</li> </ul>	<p>我們所憑藉的法律依據是您的同意，也就是您透過我們的註冊表提交詳細資訊時所提供的同意。當我們收集有關飲食要求的任何資訊時，我們也會徵求您的同意。</p>	<ul style="list-style-type: none"> <li>如果您註冊參加我們的現場活動或在活動中發言，我們會收集資料以確保您在活動中的位置，在您到達前以及活動期間向您傳達所有相關資訊，並且提供活動相關便利安排（例如協助您瞭解活動地點、住宿、旅遊或與活動相關的其他後勤細節）。</li> </ul>	<ul style="list-style-type: none"> <li>支援您針對希望參加的活動取得簽證，包括傳送邀請函、支援信函或保證函。</li> </ul>	<p>我們收集此類資訊只是為了回應您的請求，我們需要您</p>
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<ul style="list-style-type: none"> <li>如果您註冊參加我們的現場活動或在活動中發言，我們會收集資料以確保您在活動中的位置，在您到達前以及活動期間向您傳達所有相關資訊，並且提供活動相關便利安排（例如協助您瞭解活動地點、住宿、旅遊或與活動相關的其他後勤細節）。</li> </ul>						
<ul style="list-style-type: none"> <li>支援您針對希望參加的活動取得簽證，包括傳送邀請函、支援信函或保證函。</li> </ul>	<p>我們收集此類資訊只是為了回應您的請求，我們需要您</p>					

		<p>為此目的提交個人資料時提供同意。</p> <p>但是，我們可能有義務與政府機關分享此類文件並將其保留一段時間。我們這樣做是為了遵守我們的法律義務。</p>
	<ul style="list-style-type: none"> <li>邀請您參加未來的活動，並告知您我們認為您可能感興趣的產品和服務。為此，我們會維護以前活動的參與者名單，其中僅包含您的姓名、聯絡方式和業務詳細資訊。</li> </ul>	<p>我們憑藉我們的合法權益基於此目的執行業務。您可以隨時使用所有 Infobip 通訊中提供的取消訂閱連結反對進行這些通訊，我們將停止向您傳送活動邀請。</p>
	<ul style="list-style-type: none"> <li>針對我們舉辦的活動進行宣傳，包括在線上和離線媒體上發布照片、影片、音訊和文字。</li> </ul>	<p>這些活動代表我們進行業務的合法利益。</p>
我們會將資料保留多久？	<ul style="list-style-type: none"> <li>在註冊參加網路研討會或現場活動時收集的個人資料（例如姓名、聯絡方式、業務詳細資訊）會在活動結束的兩 (2) 年後刪除。</li> <li>針對組織活動而收集的所有其他個人資料（住宿和其他後勤資料）會在活動日之後的六十 (60) 天內刪除。</li> <li>任何邀請函、支援信函或保證函將依據適用的法律規定保留一段時間。</li> </ul>	
<b>5.6.當我們執行研究活動時</b>		
<b>5.6.1.當我們執行匿名市場研究活動時</b>		
我們會收集哪些個人資料？	<p>我們會收集您的姓名和電子郵件地址。然而，由於此類研究是匿名的，我們的目的是僅收集向您傳送調查問卷所需的個人資料，並非以任何方式將匿名答案與您加以連結。</p>	
我們收集資料的方式為何？	<ul style="list-style-type: none"> <li>如果您或貴企業是我們的客戶或供應商，我們會透過商業和專業網路（例如 LinkedIn）或我們的資料庫收集您的姓名和聯絡詳細資訊（電子郵件地址）。</li> </ul>	
我們收集資料的原因、收集的法律依據，	<p>我們收集與使用此類資料以便：</p> <ul style="list-style-type: none"> <li>藉由向您傳送無法追蹤的泛型調查問卷 URL 來邀請您參加調查。如果您決定參加並回答我們的問題，我們不會要求您透露任何個人資料，因為</li> </ul>	

<p><b>以及使用資料的方式為何？</b></p>	<p>我們的目的是保持回答的匿名性。這是我們進行匿名市場研究活動的一部分，藉此進一步改進我們的產品和服務以及我們的目標潛力。</p> <p>在搜尋您的電子郵件地址時，我們所憑藉的是自身的合法權益。我們的目的是透過調查僅收集匿名資訊。但是，如果需要您在回答中揭露任何關於您的資訊，我們將徵求您的同意。我們不會或試圖將所提供的答案與您加以連結，也不會以任何方式將您提供的答案告知其他企業（例如您的雇主）。</p>
<p><b>我們會將資料保留多久？</b></p>	<ul style="list-style-type: none"> <li>我們將處理您提供的答案，以取得對我們產品和服務的一般回饋意見。然而，我們絕不會要求您在回答中透露任何個人資料，如果您在回答中透露任何個人資料，我們會立即將其刪除。</li> </ul>
<p><b>5.6.2 當我們進行深入的市場研究訪談時</b></p>	
<p><b>我們會收集哪些個人資料？</b></p>	<p>我們會收集您的個人資料，例如姓名、電子郵件、業務角色以及您所工作的企業名稱。我們還會收集您在訪談期間選擇提供的任何其他資訊，訪談內容將被記錄和轉錄。</p>
<p><b>我們收集資料的方式為何？</b></p>	<ul style="list-style-type: none"> <li>我們直接向您或我們聘用的第三方提供者收集您的姓名和聯絡方式，以進行這些訪談並找到合適的參與者</li> <li>任何進一步的資訊（例如您對某些服務的整體市場的意見）將由我們或第三方提供直接向您收集，具體取決於由誰執行訪談。</li> </ul>
<p><b>我們收集資料的原因、收集的法律依據，以及使用資料的方式為何？</b></p>	<p>我們收集與使用此類資料以便：</p> <ul style="list-style-type: none"> <li>進行深入的市場研究訪談，以瞭解我們所提供的產品和服務以及我們公司整體更廣泛的市場情況。您提供的任何評論和意見將僅用於內部目的，以改進我們的產品、服務和商業慣例。</li> </ul> <p>在進行這些訪談時，我們會徵求您的同意。</p>
<p><b>我們會將資料保留多久？</b></p>	<ul style="list-style-type: none"> <li>訪談錄音和相關的個人資料（例如訪談記錄中的聯絡詳細資訊和個人資料）會在訪談日期的一（1）年後刪除。</li> </ul>
<p><b>5.6.3. 當我們執行使用者體驗研究時</b></p>	
<p><b>我們會收集哪</b></p>	<p>我們會收集您的個人資料，例如姓名、電子郵件、公司名稱以及業務角色。我們可能會記錄和轉錄所訪談的內容。</p>

些個人資料？						
我們收集資料的方式為何？	<ul style="list-style-type: none"> <li>• 如果您或貴企業是我們的客戶，我們會從我們的資料庫中收集您的姓名和聯絡詳細資訊（電子郵件地址），以邀請您加入我們的研究中心。如果您已在第三方提供者處註冊參加研究活動，我們可能會透過他們收集相同類型的資料以便向您提出邀請</li> <li>• 如果您申請加入我們的研究中心並參與我們的研究，我們將透過代表我們處理資料的第三方提供者直接向您收集個人資料</li> <li>• 在研究的過程中，我們會直接向您收集任何進一步的資訊（例如您對我們產品的回饋意見）。</li> </ul>					
我們收集資料的原因、收集的法律依據，以及使用資料的方式為何？	<p>我們收集與使用資料以便：</p> <table border="1" data-bbox="352 779 1383 1733"> <tr> <td data-bbox="352 779 871 1464"> <ul style="list-style-type: none"> <li>• 邀請您加入我們的研究中心。</li> </ul> </td> <td data-bbox="871 779 1383 1464"> <p>在邀請您（我們的客戶或業務聯絡人）加入我們的研究中心時，我們會向您傳送一封包含申請連結的電子郵件。針對此活動，我們憑藉自身的合法權益來改進我們的產品和服務。我們僅會就與您已經使用或曾經使用過的產品或服務相關的研究與您聯絡。</p> <p>當您向第三方提供者申請參與研究活動時，我們可能會與您聯絡，以讓您加入我們的研究中心，並透過第三方提供者的平台參與我們的使用者體驗研究。我們將視情況徵求您的同意或利用關於收集和處理個人資料的合約。</p> </td> </tr> <tr> <td data-bbox="352 1464 871 1733"> <ul style="list-style-type: none"> <li>• 執行使用者體驗研究活動並獲得您的回饋意見，以改進我們的產品和服務。</li> </ul> </td> <td data-bbox="871 1464 1383 1733"> <p>您的參與完全屬於自願性質。如果您決定加入我們的研究中心或參與我們的研究，我們將依據具體情況徵求您的同意或利用關於收集和處理個人資料的合約。</p> </td> </tr> </table> <p>研究內容可能會被記錄下來，而我們則會記錄您的意見和行動。研究結果、錄音和備註僅會用於改進我們的產品和服務，並且將在內部與我們的產品設計和開發團隊分享。</p>		<ul style="list-style-type: none"> <li>• 邀請您加入我們的研究中心。</li> </ul>	<p>在邀請您（我們的客戶或業務聯絡人）加入我們的研究中心時，我們會向您傳送一封包含申請連結的電子郵件。針對此活動，我們憑藉自身的合法權益來改進我們的產品和服務。我們僅會就與您已經使用或曾經使用過的產品或服務相關的研究與您聯絡。</p> <p>當您向第三方提供者申請參與研究活動時，我們可能會與您聯絡，以讓您加入我們的研究中心，並透過第三方提供者的平台參與我們的使用者體驗研究。我們將視情況徵求您的同意或利用關於收集和處理個人資料的合約。</p>	<ul style="list-style-type: none"> <li>• 執行使用者體驗研究活動並獲得您的回饋意見，以改進我們的產品和服務。</li> </ul>	<p>您的參與完全屬於自願性質。如果您決定加入我們的研究中心或參與我們的研究，我們將依據具體情況徵求您的同意或利用關於收集和處理個人資料的合約。</p>
<ul style="list-style-type: none"> <li>• 邀請您加入我們的研究中心。</li> </ul>	<p>在邀請您（我們的客戶或業務聯絡人）加入我們的研究中心時，我們會向您傳送一封包含申請連結的電子郵件。針對此活動，我們憑藉自身的合法權益來改進我們的產品和服務。我們僅會就與您已經使用或曾經使用過的產品或服務相關的研究與您聯絡。</p> <p>當您向第三方提供者申請參與研究活動時，我們可能會與您聯絡，以讓您加入我們的研究中心，並透過第三方提供者的平台參與我們的使用者體驗研究。我們將視情況徵求您的同意或利用關於收集和處理個人資料的合約。</p>					
<ul style="list-style-type: none"> <li>• 執行使用者體驗研究活動並獲得您的回饋意見，以改進我們的產品和服務。</li> </ul>	<p>您的參與完全屬於自願性質。如果您決定加入我們的研究中心或參與我們的研究，我們將依據具體情況徵求您的同意或利用關於收集和處理個人資料的合約。</p>					
我們將會將資料	<ul style="list-style-type: none"> <li>• 訪談錄音和相關的個人資料（例如訪談記錄中的聯絡詳細資訊和個人資料）會在訪談日期的一 (1) 年後刪除。</li> </ul>					

保留多久？	
<b>5.7. 當您造訪我們的網站時</b>	
我們會收集哪些個人資料？	在造訪我們的網站時，我們可能會透過放置 Cookie 來收集您的 IP 位址、瀏覽器類型和相關資訊、您瀏覽過的頁面和瀏覽順序，以及您是新訪客還是回訪者。
我們收集資料的方式為何？	<ul style="list-style-type: none"> <li>當您瀏覽我們的網站時，透過在瀏覽器中放置 Cookie 直接向您收集。這些 Cookie 會自動放置（必要性 Cookie）或僅在您同意後放置（功能性、分析性和廣告性 Cookie）。如需瞭解更多詳情，請檢閱我們的 <a href="#">Cookie 政策</a>。</li> </ul>
我們收集資料的原因、收集的法律依據，以及使用資料的方式為何？	<p>我們收集與使用此類資料以便：</p> <ul style="list-style-type: none"> <li>維護及改進我們的網站和整體業務。</li> </ul> <p>我們會憑藉我們的合法權益以確保網站的運作（對於必要性 Cookie），或者依靠您的同意（對於功能性、分析性和廣告性 Cookie）進行資料收集。</p> <p>有關如何管理（包括撤銷）您同意之 Cookie 的更多資訊，<a href="#">請檢閱我們的 Cookie 政策</a>。</p>
我們將資料保留多久？	<ul style="list-style-type: none"> <li>時間長度需視自動放置（必要性 Cookie）或您同意放置（其他類別）的特定類型 Cookie 而定。如需瞭解有關特定類型 Cookie 保留期限的更多詳細資訊，請檢閱我們的 <a href="#">Cookie 政策</a>。</li> </ul>
<b>5.8. 當您向我們申請工作或實習時，或者當您註冊接收職位發布最新消息時</b>	
我們會收集哪些個人資料？	<p>當您向我們申請工作或實習時，我們會收集：</p> <ul style="list-style-type: none"> <li>您的姓名、聯絡方式（電子郵件地址和電話號碼）和居住地，以及您的教育程度、先前的工作經驗，以及在您表達有興趣加入我們團隊時選擇在簡歷 (CV) 或求職表中與我們分享的任何其他資訊</li> <li>在適用法律允許的情況下，我們還可能會透過您使用的商業網站（例如 LinkedIn）收集有關您的專業資訊，如果您的簡歷或求職表中包含此類來源的連結，我們可能會搜尋其內容以尋找有關您或其他來源（例如網頁）的更多專業資訊</li> <li>如果我們安排面試，並且您通過了我們的遴選程序，我們可能會收集在面試過程中透過您所收集到的更多資訊、進行的評估測試結果，以及面試記錄和面試過您的同事的評論。我們也可能會透過您的推薦人收集有關您的專業經驗方面的資訊（如果您有註明）</li> </ul>



	<ul style="list-style-type: none"> <li>如果您成功通過應徵過程，我們也可能會在法律允許的情況下進行背景調查。在進行調查之前，我們將向您提供個別的隱私權通知。</li> </ul> <p>當您註冊以接收職位發布最新消息時，我們會收集您的姓名以及您的電子郵件地址。</p>
<p><b>我們收集資料的方式為何？</b></p>	<ul style="list-style-type: none"> <li>當您將簡歷或求職表提交到我們的招聘軟體時，或者當您在軟體中建立帳戶以便接收職位發布最新消息時，直接向您收集。</li> <li>透過我們所聘用的幫助我們找到空缺職位潛在應徵者的人員招募機構，或是透過您使用的商業網站（例如 LinkedIn）收集。</li> <li>我們可能會在遴選過程中收集有關您的更多資訊。此類資訊將由您和我們共同產生。例如，您可能會完成評估測試，或者我們可能會做面試記錄或是與您的推薦人聯絡。</li> <li>如果您成功通過應徵過程，我們也可能在法律允許的情況下透過背景調查機構收集您的個人資料。</li> </ul>
<p><b>我們收集資料的原因、收集的法律依據，以及使用資料的方式為何？</b></p>	<p>我們收集與使用您的個人資料以便：</p> <ul style="list-style-type: none"> <li>透過讓您能夠向我們申請工作或實習以評估您是否適合 Infobip 的職位，尋找將成為我們全球團隊成員的人才</li> <li>讓您能夠註冊接收職位發布最新消息。</li> </ul> <p>對於基於這兩個目的的大部分活動，我們會徵求您的同意以收集和處理您的個人資料。您可以在我們的人員招募軟體（<a href="#">可透過我們的人才招募網頁下載</a>）中建立個人資料來提交您的簡歷，以及申請空缺職位或接收職位發布最新消息。提交時，您將需要同意我們在同意書指定的期限內基於招募目的處理您的個人資料。</p> <p>如果您沒有直接將簡歷提交到我們的招募軟體中（例如，當我們從人員招募機構收到簡歷，或是當我們在您使用的商業網站上找到您的專業詳細資訊時），我們將傳送一封電子郵件給您，其中包含指向我們招募軟體的連結，同時會要求您同意我們保留您的個人資料以使用於招募目的。在此情況下，我們會收集您的個人資料，並依據我們尋找潛在求職者的合法權益透過電子郵件與您聯絡。但是，我們需要您的同意才能進一步處理您的個人資料。如果您在收到電子郵件後三十天內未能向我們提供同意，我們將自我們的資料庫中刪除您的個人資料。</p> <p>在遴選過程中，我們會收集更多資訊，以審查您的專業資格和興趣，並能夠選擇最佳人選。我們還會在適用法律允許的範圍內進行相關背景調查，包括身分驗證、工作權驗證、教育程度、專業執照和先前的就業情況驗證、推薦人驗證、公司登記查核和犯罪查核。此外，對於高級主管職位，我們還將透過公開來源進行聲</p>

	<p>譽查核。對於此類資訊的處理，我們憑藉我們擁有的合法權益、您的同意或法律義務，處理方式將視情況而有所不同。</p> <p>如果您被選定為某个工作職位或實習機會的最合適人選，您將會收到聘用通知書。如果您接受，我們將會收集更多資訊，以便能夠與您達成並簽訂協議。我們將進一步收集和處理您的個人資料，以便與您簽訂就業或實習協議，或在簽訂此協議之前依據您的要求採取某些步驟。您將會收到適用於我們員工的 Infobip 隱私權聲明，並能在聲明中找到相關的隱私權資訊。</p> <p>我們透過我們處理者 Workday Ltd. 的招募平台收集和處理您的個人資料。您的個人資料會收集並儲存在 Workday 位於歐盟的資料中心維護的伺服器上。資料將由 Infobip 招募團隊的授權成員處理。但是，如果平台出現問題，Workday 支援團隊也可能會存取您的個人資料，以便協助我們解決問題。如果您想瞭解有關 Workday 隱私權慣例的更多詳細資訊，您可以參閱 <a href="#">Workday 的隱私權政策</a>。</p> <p>我們可能會在 Infobip 集團公司 (<a href="#">子公司與關係企業</a>) 內部分享您的個人資料。由於我們是一家全球性公司，我們可能會聘請我們雇用招募團隊成員的子公司和關係企業以完成招募流程。</p>
<p><b>我們會將資料保留多久？</b></p>	<ul style="list-style-type: none"> <li>您的招募相關個人資料將會在您向我們提供同意期限屆滿後刪除（如果您撤銷同意，則會更早刪除）。這些期限可能因各個國家/地區的當地立法而有所不同。</li> </ul> <p>如果應有關當局要求，或者需要捍衛我們合法權利的情況下，我們可能需要將這些資料保留不同於上述時間的期限。如需瞭解更多詳情，請參閱第 11 節。</p> <p>請注意，<a href="#">您有權隨時撤銷您的同意</a>。如果您想撤銷您的同意或<a href="#">編輯您的個人資料</a>，您可以直接在我們的招募軟體中存取您的個人資料以完成撤銷或是編輯。否則，您可以隨時透過聯絡我們的資料保護官來撤銷您的同意以及行使您的其他權利。有關您權利的更多資訊，請參閱下面第 9 節的內容。</p>
<p><b>5.9.當您就社會影響倡議與我們聯絡或我們就此類倡議進行合作時</b></p>	
<p><b>我們會收集哪些個人資料？</b></p>	<p>我們會收集個人資料（例如您的姓名、聯絡方式、職務）以及您所工作或代表或是您參與其活動的企業名稱。</p>
<p><b>我們收集資料的方式為何？</b></p>	<ul style="list-style-type: none"> <li>當您在我們的網站上填寫聯絡表單，或是直接或透過您所工作的企業或安排您參與活動的企業與我們聯絡時，直接向您收集資料。</li> </ul>
<p><b>我們收集資料的原因</b></p>	<p>我們收集與使用您的個人資料以便：</p> <ul style="list-style-type: none"> <li>回答您的查詢以及分析和回應您的捐贈或志願者請求</li> </ul>

<p>、收集的法律依據，以及使用資料的方式為何？</p>	<ul style="list-style-type: none"> <li>在各種專案和倡議上進行合作、獲得有關我們贈款和捐贈使用情況的資訊、維護和改善我們與貴企業的關係，以及評估我們的社會影響倡議。</li> </ul> <p>當您向我們提出查詢和請求時，我們會依據您的同意處理您的個人資料。當我們從您所工作的組織或您參與的項目處收到您的個人資料時，我們會依據我們的合法權益進行社會影響倡議。</p>
<p>我們會將資料保留多久？</p>	<ul style="list-style-type: none"> <li>我們保留您的個人資料的時長以滿足您的特定要求為限。</li> <li>以個人身分與我們聯絡之個人的所有個人資料將最遲於初次聯絡日期後的一 (1) 年內刪除。</li> <li>與代表企業提交的查詢和捐贈或志願者請求相關的個人資料將在我們最後一次通訊該年度結束的三 (3) 年後刪除。</li> <li>對於受支援的專案和計劃，法律要求的文件中包含的任何個人資料都將依照當地立法所規定的期限保留，以符合稽核、稅務和財務要求。</li> </ul> <p>如果應有關當局要求，或者需要捍衛我們合法權利的情況下，我們可能需要將這些資料保留不同於上述時間的期限。如需瞭解更多詳情，請參閱第 11 節。</p>
<p><b>5.10.當您造訪我們的辦公室或是場所時</b></p>	
<p>我們會收集哪些個人資料？</p>	<p>我們會收集您的個人資料，例如姓名、電子郵件、簽名、業務角色以及您所工作或是代表的企業名稱。我們也可能會收集您的電話號碼。當您造訪我們的辦公室時，我們也可能會收集閉路電視 (CCTV) 錄影，因為某些入口和公共區域可能處於閉路電視監控之下。</p>
<p>我們收集資料的方式為何？</p>	<ul style="list-style-type: none"> <li>當您造訪我們辦公室或我們其他公司的場所時，直接向您收集。</li> </ul>
<p>我們收集資料的原因、收集的法律依據，以及使用資料的方式為何？</p>	<p>我們收集與使用您的個人資料以便：</p> <ul style="list-style-type: none"> <li>管制我們辦公室和場所的通行（例如，在您首次造訪期間簽署保密協議），並在您造訪辦公室和場所期間為您提供額外的服務（例如自行車租賃）</li> <li>確保我們員工、訪客和財產的安全（在我們一些辦公室和場所的入口和公共區域安裝閉路電視監控）</li> <li>作為我們園區的訪客，您還可以使用 Infobip 聊天機器人瞭解關於這些地點的更多資訊，並獲得有關待辦與參觀事項的建議。當您決定與聊天機器人進行通訊時，我們將會處理您的電話號碼。</li> </ul>

	大多數這些活動都會在取得您同意的情況下進行。閉路電視監控資料的處理以及有關存取控制的處理是依據我們保護公司場所和員工的合法利益所進行。
<b>我們會將資料保留多久？</b>	<ul style="list-style-type: none"> <li>• 基於管理我們場所通行所收集的個人資料將在不再需要用於該目的時立即刪除。</li> <li>• 當我們在您造訪期間為您提供額外服務時，我們將保留您的個人資料，直到滿足您的特定要求或直到您撤銷同意為止。</li> <li>• 除非當地法律另有規定，否則閉路電視監控錄影通常會在錄製日期的九十 (90) 天後刪除。</li> </ul> <p>但是，在特定情況下，如果當地法律有規定、當局要求或需要捍衛我們的合法權益，我們可能需要將這些資料保留不同的期限。如需瞭解更多詳情，請參閱第 11 節。</p>

## 6. 我們如何以及會與誰分享您的個人資料？

我們可能會聘用供應商（也稱為廠商或是服務提供者）來幫助我們處理您的個人資料，藉此用於我們作為控制者所進行的活動以及我們在本隱私權通知中描述的活動。由於我們是一家全球性公司，在公司日常營運的過程中，我們還可能與我們的子公司和關係企業分享您的個人資料。Infobip 集團內的任何此類分享均受有關個人資料處理和傳輸的公司間協議所監管。

在聘用任何新供應商之前，我們會進行安全和隱私評估。如果此類供應商擔任我們的處理者，我們會確保個人資料的處理將遵守書面資料處理協議的規定。

儘管有上述規定，我們通常不會與第三方分享個人資料，但絕對必要和需要知道的情況則不在此限。例如：

- **電信業者和其他通訊服務提供商**在必要時設定正確的路由和連接。我們能夠透過我們與電信和其他通訊提供商（例如 Whatsapp、Viber、Facebook、Kakaotalk、Line 或 Telegram）的聯繫，將我們客戶傳送給其最終使用者的訊息傳遞給他們，無論他們位於何處都能順利收到。
- **服務和技術提供者**在絕對必要的範圍內代表我們執行特定行動。這些可能與我們的服務（例如作為我們服務功能的一部分）和其他流程（例如利用軟體提供者管理我們的求職流程）相關。
- 需要遵守我們的法律義務時的**第三方**。由於相關立法（例如司法程序）、法院命令或向我們送達的法律程序（例如刑事訴訟程序）或由於對公共安全的威脅、監管要求或是在調查或破產的背景下，我們可能會與授權的法律機構分享您的個人資料。作為通訊提供商，我們需要保留某些與通訊相關的資料用於執法目的，並且需要依據授權執

法機構的要求與他們分享此類資料。此外，如果我們有義務證明遵守相關會計、財務和稅收法規，我們可能會基於這些目的將您的資料與審計人員和稅務機關分享。

- 我們可能在行銷活動過程中利用的廣告合作夥伴。我們的 [Cookie 政策](#) 列有更詳細的資訊，以及有關在造訪我們網站時如何調整 Cookie 設定的說明。
- 作為合併、出售或其他資產轉讓情況下披露過程的 [合併與收購利益相關者](#)。在法律或合約允許的情況下，您的資訊可能會作為此類交易的環節進行轉移。

## 7. 我們會如何對您的個人資料進行國際傳輸？

我們在全球範圍內開展業務，有時我們需要透過將您的個人資料提供給上述章節所指定的各方，針對您的個人資料進行國際傳輸。所有國際傳輸均在確保您個人資料機密性和安全性的前提下進行，同時符合適用的隱私法。其中可能包括具體技術、組織以及合約措施。例如，關於歐洲經濟區以外的個人資料傳輸，我們將視需要完成並執行資料傳輸的標準合約條款。

## 8. 我們如何保護您的個人資料？

在 Infobip，我們認為安全和隱私是可以並行不悖的。為保護我們所收集和處理的個人資料，我們因此投資於開發、實施和不斷改進廣泛的技術和組織安全措施。這些措施皆依據 ISO 27001:2013 標準要求實施，如需閱讀更多詳情，[請按一下這裡](#)。如需查詢我們目前以及最新的認證清單，[請按一下這裡](#)。

我們會從員工向 Infobip 報到的第一天開始到入職流程，針對所有員工進行有關隱私和安全領域方面的訓練，並且在他們於 Infobip 的任職期間持續進行。

在我們聘用供應商之前，我們會檢查他們的安全做法並且確認是否符合適用隱私法。在聘用之後，我們將持續針對他們進行定期評估。

## 9. 您對您的個人資料擁有哪些權利？

依據適用的隱私法，您可能對您的個人資料享有某些權利。

在適用隱私法授予的情況下，您有權：

- 撤銷您對我們處理您個人資料的同意（如果此類處理是基於您的同意，並且此同意是唯一允許的處理基礎），同時不會影響撤銷前依據同意進行處理的合法性
- 向我們要求存取您的個人資料，這表示要求取得一份我們所持有的關於您個人資料的副本
- 要求我們糾正（更正）您認為不準確的個人資料，並且補足您認為不完整的個人資料
- 要求我們在某些情況下清除您的個人資料
- 要求我們在某些情況下限制處理您的個人資料

- 如果我們依據您的同意或與您的合約關係以自動方式處理您的個人資料，您可以行使資料可攜性的權利
- 如果我們依據自身的合法權益處理您的個人資料，您有權反對處理
  - 如果您希望反對基於行銷目的處理您的資料，您可以利用我們行銷通訊中提供的取消訂閱連結隨時停止對資料的處理
- 在特殊情況下，當我們執行自動決策制定操作（包括分析）時，您可能還擁有特定權利。

如果您對我們如何使用您的個人資料有任何疑問，或者您希望行使某項權利或解決有關處理您的個人資料的投訴，您可以透過傳送電子郵件傳送至以下地址與我們的資料保護官聯絡：

[data-protection-officer@infobip.com](mailto:data-protection-officer@infobip.com)。

如果適合，您可以向您經常居所、工作地或涉嫌侵權地的歐盟成員國的監管機構提出投訴。如果您基於任何其他原因而希望提出投訴或是聯絡相關的資料保護機構，您可以透過此連接查找 EEA 資料保護機構的聯絡詳細資訊：[https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en)。

## 10. 我們是否會進行對您有重大影響的自動決策？

我們採取部分自動化測量（包括人工介入）來分析我們平台使用者使用現有功能和工具的方式（例如透過追蹤我們網路介面內的使用行為），以便針對效能提升（例如如何更好地使用某些功能）向您提供相關建議。

## 11. 我們會將您的個人資料保留多久？

基於您的同意所收集的個人資料將依同意書中規定的期限保留。如果您想撤銷基於任何目的處理個人資料的同意並刪除您的資料，您可以隨時傳送電子郵件至 [data-protection-officer@infobip.com](mailto:data-protection-officer@infobip.com) 以執行此操作。對於未經您同意的個人資料，我們只會在達成收集目的所需的時間內保留，然後依據法律要求將其設為不可識別身分（匿名）或將其刪除。

具體的保留期限列在此隱私權通知第 5 節的相應活動之下。所列的保留期限是標準預設期間。在某些情況下，可能由於與執法、稅務或其他目的有關的當地法律而適用例外情況。此外，如果訴訟、執法請求或政府調查等法律事務要求我們保留記錄（包括包含個人資訊的記錄）的時長超過第 5 節中所列的時間，則我們將於不再有保留相關記錄的法律義務時將其刪除。

## 12. 兒童所提供的資訊

16 歲以下的兒童不能以客戶的身分使用我們的產品和服務。如果我們得知或被告知發生這種情況，我們將立即採取合理措施，盡快將其資訊從我們的記錄中刪除。如果您認為有 16 歲以下的兒童正在以客戶的身分使用我們的產品或服務，請透過以下方式與我們聯絡：[data-protection-officer@infobip.com](mailto:data-protection-officer@infobip.com)。

## 13. 我們會多久更新一次本隱私權通知？

本隱私權通知的最新版本將管理我們收集、處理和揭露個人資料的做法。我們將在此頁面上提供任何修改通知。上次更新日期始終位於本隱私權通知的開頭。

先前版本：[2022年11月29日](#)。

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# Argentina

In addition to or in derogation of the Privacy Notice, the following applies to processing of personal data for individuals residing in Argentina:

For the purposes of Argentinian data protection laws, including The Personal Data Protection Act (“PDPA”) Act No. 25.326 and the Decree No. 1558/2001, personal data will be processed by Infobip Latam S.A., domiciled at Av. Dorrego 1789, Piso 2, Oficina 201/202, Buenos Aires (C1414CKM) Argentina, as the controller of the personal data.

Your consent is granted for the collection, processing, use and transfer of personal data as described in the Privacy Notice, in the Annex hereto.

In the event you wish to exercise any of the rights, you should contact Infobip using the details provided in Section 11 of the Privacy Notice. If you consider that you have not been duly attended to in the exercise of your rights, you may file a claim with the la Agencia de Acceso a la Información Pública.

# Brazil

In addition to or in derogation of the Privacy Notice, the following applies to processing of personal data for individuals residing in Brazil:

For the purposes of Brazilian data protection laws, including the General Data Protection Law No 13,709/2018 (“LGPD”), Infobip Brasil Serviços de Valor Adicionado Ltda, domiciled at

Avenida Candido de Abreu, 70, sala 81 Curitiba/PR, 80530-000 Brasil, has appointed its Data Protection Officer (“DPO”) as our Representative. Our DPO is contactable via the email address [data-protection-officer@infobip.com](mailto:data-protection-officer@infobip.com).

If you are located in Brazil, you have all the following rights as set forth in the LGPD:

- i. Be informed if there is any personal data processing and request information and a copy of the personal data.
- ii. Request the correction of your personal data that is inaccurate and/or completion of such data which is incomplete.
- iii. Ask us to anonymize, block or erase your personal data in certain circumstances.
- iv. Request to transmit your personal data to another service or product provider, limited to commercial or industrial secrets.
- v. Provide an informed consent for specific purpose and within determined period of retention and withdraw your consent at any time for the future where processing is based on your consent.
- vi. To oppose the processing carried out based on one of the legal basis other than your consent.

- vii. If we process your personal data solely by automated means, you have the right to request the review such decisions.
- viii. Ask us about public and private entities with which we have shared your data.
- ix. Withdraw consent at any time.
- x. Be informed about the possibility of denying consent, and the consequences of such denial.

You have the right to lodge a complaint regarding your personal data before the Brazilian Data Protection National Authority (“ANPD”) as well as consumer-defense entities.

If you have any questions on how we use your personal data or if you wish to exercise a certain right or resolve a complaint regarding the processing of your personal data, you can contact our addressed Data Protection Officer by sending an email to the following email address: [data-protection-officer@infobip.com](mailto:data-protection-officer@infobip.com).

# Canada

In addition to or in derogation of the Privacy Notice, the following applies to processing of personal data for individuals residing in Canada:

The term “**applicable privacy law**” includes all Canadian laws and regulations applicable to the processing of personal data, including the *Personal Information Protection and Electronic Documents Act* (Canada) or any equivalent provincial legislation, including, the *Personal Information Protection Act* (British Columbia), the *Personal Information Protection Act* (Alberta), or the *Act respecting the protection of personal information in the private sector* (Quebec).

We will not collect personal data indiscriminately, but will limit collection of personal data to that which is reasonable and necessary. We will also collect personal data as authorized or required by law. We will only use or disclose your personal information for the purposes set out above and as required or authorized by law. We will retain your personal information as long as is reasonable to serve the original purpose for which we collected the information, and for so long as retention is necessary for a legal or business purpose.

## LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA – CONSENT

We will process your personal data only with your knowledge and consent, except where exempted, required or permitted by applicable laws. The form of consent may vary depending on the circumstances and the type of information being requested. Your consent may be express or implied. Taking into account the sensitivity of your personal information, purposes of collection, and your reasonable expectations, we will obtain the form of consent that is appropriate to the personal information being processed. By using our Services or otherwise by choosing to provide us with your personal data, you acknowledge and consent to the processing of your personal data in accordance with this Privacy Notice and as may be further identified when the personal data is collected. When we process your personal data for a new purpose, we will document that new purpose and ask for your consent again, unless applicable law authorizes or requires us to do so without consent.

If you are a resident of the province of Quebec, we will always seek your express consent to the collection, use, and communication of your personal data, except when specifically allowed by applicable law. For example, we may, in certain cases, use or communicate your personal data, without your consent for purposes of fraud prevention or to provide a service requested by you. You may, in certain circumstances, be asked to confirm your consent in a separate document. When we process your personal data for a new purpose, we will, when required by applicable law, document that new purpose and ask for your consent again.

If you do not consent to the processing of your personal data in accordance with this Privacy Notice, please do not access or continue to use the Services or otherwise provide any personal data to us.

## TRANSFERS OF YOUR PERSONAL DATA ACROSS BORDERS

As noted in section 7 of this Privacy Notice, your personal data may be processed, used or stored in jurisdictions other than your jurisdiction of residence. As a result, when your personal data is processed, used or stored in a jurisdiction other than where you are residing, it may be subject to the law of that foreign jurisdiction, including any law permitting or requiring disclosure of the information to the government, government agencies, courts and law enforcement in that jurisdiction.

When we transfer your personal data outside your jurisdiction of residence, we will use reasonable safeguards, including contractual requirements with the third parties receiving and processing the personal data, to ensure the adequate protection of your personal information.

## YOUR RIGHTS REGARDING YOUR PERSONAL DATA

If you are a Canadian resident, you may have the following rights under applicable Canadian privacy laws:

- **Right to access:** You have the right to request that we confirm the existence of the personal information concerning you that we hold and that we allow you to access that personal information. In some situations, we may not be able to provide access to certain personal information (for example, if disclosure would reveal personal information about another individual, or the personal information is protected by solicitor/client privilege). We may also be prevented by law from providing access to certain personal information. If we refuse an access request, we will notify you in writing, document the reasons for refusal, and outline further steps which are available to you.
- **Right to correct:** If your personal information that we hold is inaccurate, incomplete or equivocal, or if its processing is not authorized by law, you have the right to request that the information be rectified. If a challenge regarding the accuracy of your personal information is not resolved to your satisfaction, we will annotate the personal information with a note that the correction was requested but not made.
- **Right to revoke consent:** You have the right to revoke your consent to the use or communication of your personal information. This will not affect the lawfulness of any use or communication of your personal information that happened before you revoked your consent. If you revoke your consent, we will inform you of the likely consequences of that revocation, which may include our inability to provide certain services for which that information is necessary.
- **Right to portability:** If you are a resident of the province of Quebec, you have the right to request that your personal information that we hold be communicated to you, or to any person you may designate, in a structured, commonly used technological format.
- **Right to de-indexation:** If you are a resident of the province of Quebec, you may, in certain situations and if the legal requirements are met, require that we cease disseminating your personal information, or that we de-index any hyperlink attached to your name that provides access to your personal information.

# Colombia

In addition to or in derogation of the Privacy Notice, the following applies to processing of personal data for individuals residing in Colombia:

For the purposes of Colombian data protection laws, including Law 1581, 2012 and its regulatory decrees, personal data will be processed by Infobip Colombia S.A.S., domiciled at Carrera 11 B No. 97-56 Edificio Ápice Oficina 601, Bogotá, Colombia, as the controller of the personal data.

Your rights: In addition to the rights that are outlined in Section 9 of this privacy notice, you are also entitled to:

- Request from us a copy of the information that was given to you in the moment you consented to the processing of your personal data.
- Request rectification or correction of their personal data.
- Request evidence of the consent, except when consent is not required for the processing.
- Be informed about the use that has been effectively given to your personal data.
- Withdraw consent in certain circumstances including where it is no longer necessary for Infobip to process the personal data.
- File claims before the Superintendency of Industry and Trade.

In addition to the information set out in Section 7 above, when this Privacy Notice refers to the possibility of sharing your personal information or performing international transfers of such information, these operations shall comprise, under Colombian laws, both transfers and transmissions of your personal data. Both transfers and transmissions shall be fully compliant with applicable Colombian laws

If you consider that you have not been duly attended to in the exercise of your rights, you may file a claim with the la Superintendencia de Industria y Comercio, Delegatura de Protección de Datos Personales.

# Egypt

In addition to or in derogation of the Privacy Notice, the following applies to processing of personal data for individuals residing in Egypt:

## DATA SUBJECT RIGHTS

In addition to the data subject's rights stated under Section 9 of the Privacy Notice, you as the data subject enjoy the following additional rights:

- 1) To object to the processing of personal data or its results whenever the same contradicts your fundamental rights and freedom.
- 2) To get notified of any infringement to your personal data; and
- 3) To submit a complaint before the Personal Data Protection Center (the "PDPC") in any of the following cases:
  - Infringement or breach of the right of personal data protection
  - Failure to exercise your rights
  - In relation to the decisions issued by the data protection officer for the personal data held by the processor or the controller in relation to the requests submitted to the data protection officer.

## NOTIFICATION OF BREACH

Infobip shall notify the PDPC of any personal data infringement within seventy-two (72) hours of such infringement. In the event that such infringement relates to national security protection concerns, then the notification shall be immediate.

In all cases, Infobip shall notify the data subject with the infringement of the personal data of the data subject and the measures taken within 3 (three) days from the date of notifying the PDPC.

# India

In addition to or in derogation of the Privacy Notice, the following applies to processing of personal data for individuals residing in or subject to the laws of India:

## WHAT PERSONAL DATA DO WE COLLECT, WHY AND ON WHICH LEGAL BASIS, HOW DO WE USE IT AND FOR HOW LONG DO WE KEEP IT?

In addition to the data collected under the Privacy Notice, we also collect the following sensitive personal data or information (as this term is defined under the Information Technology [Reasonable Security Practices and Procedures and Sensitive Personal Data or Information] Rules, 2011) from you, namely financial data including but not limited to, billing and financial details of a customer (e.g. billing address, prepaid or postpaid customer, bank account details, information about creditworthiness and payment behaviour, and other additional information as required under applicable laws). This data will be used for the purposes listed under Section 5 of this Privacy Notice, for which we rely on your consent.

## INFORMATION FROM CHILDREN

To the extent you are residing in or subject to the laws of India, children above the age of 16 and under the age of 18 cannot use our products or services as our customers without the express consent and supervision of a parent or guardian. If you are above the age of 16 but under the age of 18, your parent or guardian is required to consent on your behalf prior to using our products or services as our customer. If we learn or are notified that you are below the age of 18 and using our services without express consent of a parent or guardian, we will immediately take reasonable steps to delete that information from our records as quickly as possible. If you think a child under 18 is using our products or services as a customer without express consent of a parent or guardian, please contact us at [data-protection-officer@infobip.com](mailto:data-protection-officer@infobip.com).

## GRIEVANCE OFFICER

In case of any queries or grievances with respect to your data or this Privacy Notice, you may contact our Grievance Officer at [data-protection-officer@infobip.com](mailto:data-protection-officer@infobip.com).

# Indonesia

In addition to or in derogation of the Privacy Notice, the following applies to processing of personal data for individuals residing in Indonesia or outside the territory of Indonesia when that has legal impact towards: (i) the territory of Indonesia or (ii) data subjects being Indonesian citizens outside of the territory of Indonesia. With reference to the applicable Indonesian laws and regulations, this Privacy Notice is also prepared in Indonesian language version in addition to the English language version for the purpose of delivering this Privacy Notice to you (as the data subjects).

If there is any inconsistency or difference in the interpretation between the Indonesian language version and the English language version of this Privacy Notice, the English language version shall prevail.

With respect Personal Data Protection, the primary law source is Law No. 27 of 2022 on Personal Data Protection ("**Law No. 27**") and along with other related regulations being: (i) Law No. 11 of 2008 regarding Electronic Information and Transactions as amended by Law No. 19 of 2016 ("**EIT Law**"); (ii) Government Regulation No. 71 of 2019 regarding Provisions of Electronic Systems and Transactions ("**Reg. 71**"); (iii) Minister of Communications and Informatics Regulation No. 20 of 2016 regarding the Protection of Personal Data in an Electronic System ("**MOCI 20/2016**"). For your ease of reference, we shall refer Law No. 27, EIT Law, Reg.71 and MOCI 20/2016 jointly or separately as the "**Indonesian Data Protection Laws**" or "**IDPL**".

In addition to or in derogation of this Privacy Notice, the following applies to the processing of personal data by Infobip within the scope of the IDPL.

## DEFINITIONS

For Indonesia, the definitions in Section 1 of the Privacy Notice shall be amended and added to become as follows:

- "personal data" means data regarding a person either being identified and/or can be identified either individually or combined with other information either directly or indirectly through an electronic system and/or non-electronic system.
- "controller" means each person, public agency, and international organization acting individually or jointly in determining the purpose and exercising control over the processing of Personal Data.
- "processor" means each person, public agency and international organization acting individually or jointly in processing the Personal Data on behalf of the Personal Data Controller.
- "personal data subject" is an individual to whom the personal data applies.

## ADDITIONAL INFORMATION ON RIGHTS OVER PERSONAL DATA

In addition to the information set out in Section 9 above, and pursuant to Law No. 27 you have the right to:

- Obtain information regarding identity clarity, basis of legal interest, purpose of requesting and using personal data, and accountability of parties that request personal data;
- Object a decision-making action that is based solely on automated processing, including profiling, which has legal consequences or has a significant impact on personal data subjects;
- Sue and receive compensation for violations of the processing of personal data regarding yourself in accordance with provisions of laws and regulations;
- Obtain or use personal data regarding yourself from us in a form that is in accordance with the structure or formats commonly used or readable by an electronic system; and

- Use and send personal data regarding yourself to other controllers, as long as the system used can communicate with each other securely in accordance with the personal data protection principles based on Law No. 27.

## INFORMATION FROM CHILDREN

For Indonesia, the minimum age requirement to use our products and services is 21 years.

# Japan

In addition to or in derogation of the Privacy Notice, the following applies to processing of personal data for individuals residing in Japan:

We will comply with the Act on the Protection of Personal Information (the “APPI”), other relevant laws and regulations concerning the protection of personal data, and the guidelines issued by the Personal Information Protection Commission, competent ministers, or relevant industry groups.

## JOINT USE NOTICE

Your personal data may be jointly used with Infobip Group in accordance with Article 27.5.3 of the Act on the Protection of Personal Information (“APPI”) within the scope necessary for achieving the purposes described in Section 5 of this Privacy Notice.

Infobip G.K. (address: Dai-3 Meiwa Bldg. 4F, 4-31-3 Shinbashi, Minato-ku, Tokyo 105-0004), representative director: <https://www.infobip.com/offices/japan-tokyo>, will be responsible for management of the jointly used personal data.

## YOUR DATA SUBJECT RIGHTS

In Japan, you may also have additional unique rights under the APPI such as:

- 1) To request deletion of or cessation of processing of your personal data if your personal data has been used beyond the scope necessary to achieve the purpose for which they were collected, processed or obtained by deceit or in violation of the APPI, if our use of your personal data triggers illegal acts, or if your data are no longer necessary in relation to the purposes for which they were collected, are compromised or are otherwise processed in a manner which could harm your rights or legitimate interest.
- 2) To request cessation of transferring of your personal data if your personal data is transferred to a third party in violation of the APPI or the transfer could harm your rights or legitimate interest.
- 3) To request to disclose the following information (we may refuse your request to the extent we are permitted to do so in accordance with APPI):
  - Data security measures we have been implemented; and
  - In case where your personal data has been shared with foreign companies including Infobip Group by way of joint use and external foreign service providers, (i) measures to ensure the data recipients take sufficient data security measures (the “Measures”) and the details of the Measures, (ii) measures and frequency that we audit the data recipients’ implementation of the Measures, (iii) name of

the recipient country and rules of the country that could hinder the implementation of the Measures and (iv) other obstacles that could hinder the implementation of the Measures and measures that we have conducted to solve such obstacles.

## INTERNATIONAL PROCESSING

If you are a resident of Japan, your personal data may be shared with the entities described in Section 6 of this Privacy Notice. If those recipient entities are outside of Japan, we will use reasonable endeavours to require recipients located outside Japan protect it in a way that provides comparable safeguards to those under the APPI, such as via contractual data protection obligations or because the recipient is subject to laws of another country with comparable protections. Specifically, we take “Equivalent Action” specified under Article 28.1 of the APPI to protect your personal data transferred outside of Japan.

# Malaysia

In addition to or in derogation of the Privacy Notice, the following applies to processing of personal data for individuals residing in Malaysia:

## DEFINITIONS

The term “**applicable privacy law**” includes the Personal Data Protection Act 2010 (“**PDPA**”) of Malaysia.

Terms such as “**processor**”, “**controller**”, “**personal data**”, shall have the same meaning ascribed to them and include any term or person meeting any similar concept in the applicable privacy law. For the avoidance of doubt, the term “**controller**” shall have the same meaning ascribed to “**data user**” in the applicable privacy law.

## PROVISION OF PERSONAL DATA

The provision of your personal data is mandatory. If you do not provide us the personal data, we will not be able to provide you with our Services.

## WHAT PERSONAL DATA DO WE COLLECT, WHY AND ON WHICH LEGAL BASIS, HOW DO WE USE IT AND FOR HOW LONG DO WE KEEP IT?

### 5.1.1. To enter into an agreement, create the customer’s account, and provide the necessary support to enable the customer to use our Services

Infobip will refrain from using the following personal data:

- Billing and financial details of a customer (e.g. billing address, prepaid or postpaid customer, bank account details, VAT number, information about creditworthiness and payment behaviour, and other additional information as required under applicable laws)

Banking account-related data is subject to bank secrecy laws under the Financial Services Act 2013 (“**FSA**”).

## INFORMATION FROM CHILDREN



Our Services are not intended for children or minors (individuals under 18 years of age). In the event information of minors is provided to us, you, as their parent or legal guardian hereby consent to the processing of the minor's information and personally accept and agree to be bound by this Privacy Notice and take responsibility for their actions.

## **CONTACT INFORMATION**

If you have any questions on how we use your personal data or if you wish to exercise a certain right or to limit the processing of your personal data or resolve a complaint regarding the processing of your personal data, you can contact our Data Protection Officer by sending an email to the following email address: [data-protection-officer@infobip.com](mailto:data-protection-officer@infobip.com) or via this telephone number: 603-8601 0105.

## **LANGUAGE OF THIS PRIVACY NOTICE**

In the event of any discrepancy or inconsistency between the English version and Malay version of this Privacy Notice, the English version shall prevail.

# Nigeria

In addition to or in derogation of the Privacy Notice, the following applies to processing of personal data for individuals residing in Nigeria:

## **HOW DO WE SECURE YOUR PERSONAL DATA**

Please note that in relation to any personal data you submit to us online, we cannot guarantee the security of information transmitted over the internet or that unauthorised persons will not obtain access to personal data. Infobip is not responsible and has no control over websites outside its domain. We do not monitor or review the content of other party's websites which are linked from our website or media platforms. Please be aware that we are not responsible for the privacy practices, or content of these sites. Infobip will not accept any responsibility for any loss or damage in any manner, howsoever caused, resulting from your disclosure to third parties of personal information.

Where we collect any special category personal information about your ethnic background, sexual orientation, political opinions, religion, trade union membership, or criminal record, we will apply additional security controls to protect that data.

## **INTERNATIONAL TRANSFER OF PERSONAL DATA**

We will seek your consent when we need to send your data to a country without an adequate data protection law. We will protect your information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. Some of the safeguards we use are firewalls and data encryption, physical access controls to our data centres, and information access authorization controls.

## **PERSONAL DATA BREACH**

We have procedures to deal with any suspected personal data breach and will notify you where we are legally required to do so. In the event of a breach, we will notify the Nigeria Data Protection Bureau within 72 hours of becoming aware of the breach.

## CONSENT

You accept this privacy policy when you give consent upon access to our platforms, or use our services, content, features, technologies or functions offered on our website, digital platforms or visit any of our offices for official or non-official purposes. This privacy policy governs the use of our platforms and services by users, unless otherwise agreed through a written contract. We may amend this privacy policy at any time by posting a revised version on our website, or placing such notice at conspicuous data collection points.

# Pakistan

In addition to or in derogation of the Privacy Notice, the following applies to processing of personal data for individuals residing in Pakistan:

### 5.1.2 To enable customers to exchange their communications through our Services, ensure the security of our network and Services, and handle billing and payments

<p><b>Why do we collect it, under which legal basis, and how do we use it?</b></p>	<p><b>Traffic data</b> is generally kept in the form of communication detail records (in original).</p> <p>The requirements to assess original form shall be:</p> <ul style="list-style-type: none"> <li>a) Whether there exists a reliable assurance as to the integrity from the time when it was first generated in its final form;</li> <li>b) Whether the data has remained complete and unaltered, apart from the addition of any endorsement or any change which arises in the normal course of communication, storage, or display; and</li> <li>c) That the standard for reliability of the assurance shall be assessed with regard to the purpose for which the data was generated and all other relevant circumstances.</li> </ul> <p>It will be ensured that data retained shall:</p> <ul style="list-style-type: none"> <li>a) remain accessible so as to be usable for subsequent reference;</li> <li>b) be originally generated, sent, or received, or can be shown to accurately represent the contents and form in which it was originally generated, sent, or received; and</li> <li>c) contain information that enables identification of the origin, destination, date and time of when data was generated, sent or received.</li> </ul>
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## INFORMATION FROM CHILDREN

Children under 18 cannot use our products and services as our customers. If we learn or are notified that it is the case, we will immediately take reasonable steps to delete that information from our records as quickly as possible. If you think a child under 18 is using our products or services as a customer, please contact us at [data-protection-officer@infobip.com](mailto:data-protection-officer@infobip.com).

# Philippines

In addition to or in derogation of the Privacy Notice, the following applies to processing of personal data for individuals residing in the Philippines:

## CONSENT ON COLLECTION AND PROCESSING OF PERSONAL DATA

To the extent that you disclose to us any personal information (whether or not coming within the definition of personal data above) of another individual, such as your spouse, children or other relatives or family members, we shall assume, without independent verification, that you have obtained such individual's consent and that you have been specifically authorized by such individual to disclose his or her information for our processing in accordance with the terms of this Privacy Notice.

Consistent with how the term is defined in the Philippine Data Privacy Act of 2012 (Republic Act No. 10173) ("DPA"), the personal data referred to above excludes any de-identified or anonymized data that does not enable or allow Infobip Limited to identify or ascertain your and your relatives' or family members' identity.

By giving us your personal data, it is understood that you consent to the transfer of such information for the purpose of data sharing, as above discussed, where applicable, to any entity that forms a direct or indirect part of Infobip Limited, its subsidiaries or affiliates, as well as third parties, either local or foreign, as enumerated in Section 6 above. In all instances, the personal information processor shall only process personal information pursuant to our specific instructions as laid out in the respective outsourcing agreements. Rest assured that we will only disclose the minimum amount of information which we deem necessary and will take all reasonable steps to ensure that such information is kept confidential.

Notwithstanding this, we may collect, use or disclose your personal information without your knowledge or consent whenever we are permitted or required by the DPA and other applicable laws or regulatory requirements.

## ADDITIONAL RIGHTS OVER PERSONAL DATA

- **Right to be informed:** Right to be informed, whether personal data pertaining to you shall be, are being, or have been processed, including the existence of automated decision-making and profiling. You shall be notified and furnished with information before the entry of your personal data into the processing system of the personal information controller, or at the next practical opportunity: (a) Description of the personal data to be entered into the system; (b) Purposes for which they are being or will be processed, including processing for direct marketing, profiling or historical, statistical or scientific purpose; (c) Basis of processing, when processing is not based on your consent; (d) Scope and method of the personal data processing; (e) The recipients or classes of recipients to whom the personal data are or may be disclosed; (f) Methods utilized for automated access, if you have allowed the same, and the extent to which such access is authorized, including meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you; (g) The identity and contact details of the personal data controller or its representative; (h) The period for which the information will be stored; and (i) The existence of your rights as a data subject, including the right to access, correction, and object to the processing, as well as the right to lodge a complaint before the Philippine National Privacy Commission.

- **Right to access:** Upon request in writing, you should be given access to information on the processing of your personal information, including information on the following:
  - i. Contents of personal data and categories of data that were processed;
  - ii. Sources from which your personal data were obtained, if the data was not collected from you;
  - iii. Purposes of processing;
  - iv. Identities and addresses of recipients of personal data;
  - v. Manner by which your personal data were processed;
  - vi. Reasons for the disclosure and purposes for granting access to the recipients of your personal data;
  - vii. Information on automated processing, in case the data was used as the sole basis for any decision that significantly affects or will significantly affect you as a data subject;
  - viii. Date when your personal data was last accessed or modified;
  - ix. The designation, identity, and address of the controller or processor other than Infobip Limited, if any;
  - x. Period for which particular categories of information will be stored or if not possible, the criteria used to determine the retention period; and
  - xi. The designation, name or identity, and address of the personal information controller's data protection officer.
- **Right to rectification:** You have the right to dispute the inaccuracy or error in the personal data and have the personal information controller correct it immediately and accordingly, unless the request is vexatious or otherwise unreasonable. If the personal data has been corrected, the personal information controller shall ensure the accessibility of both the new and the retracted information and the simultaneous receipt of the new and the retracted information by the intended recipients thereof. Recipients or third parties who have previously received such processed personal data shall be informed of its inaccuracy and its rectification, upon your reasonable request.
- **Right to damages:** You shall be indemnified for any damages you sustain due to such inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of your personal data, taking into account any violation of your right and freedoms as a data subject.

## SOURCES OF INFORMATION

Your personal data will be obtained from the sources as discussed in Section 4.

By giving your consent and agreeing to this Privacy Notice, you authorize us and such third parties as we may engage to collect and obtain personal data pertaining to you from the sources mentioned above.

As the accuracy of your personal data depends largely on the information you provide to us, kindly inform us as soon as practicable if there are any errors in your personal data or if there have been changes to your personal data.

## ACCESS TO PERSONAL DATA AND LIMITING PROCESSING

You have rights to request access or to correct your personal data or to lodge a complaint with the Philippine National Privacy Commission or to limit the processing thereof at any time hereafter in line with applicable law. We must point out that there are consequences in limiting the processing as requested. If this is the case, we will inform you of the consequences in further detail depending on the specific personal data. You are also requested to correct or amend your personal data to the extent you realize it is incorrect, inaccurate, or outdated.

If you consider, after contacting us (as provided in Section 9 above), that your rights are not respected you can file a claim directly to the competent supervisory authority, which for the Philippines is the National Privacy Commission (<https://www.privacy.gov.ph>).

# Saudi Arabia

In addition to or in derogation of the Privacy Notice, the following applies to processing of personal data for individuals residing in Saudi Arabia:

Whilst we will continue to rely on legitimate interests as our lawful basis for processing for the purposes of complying with the GDPR, for the purposes of complying with the laws and regulations of Saudi Arabia, we will seek your express consent to process your personal data where:

- We rely on legitimate interests within the Privacy Notice; and
- Where an alternative lawful basis for processing is not available.

# Singapore

In addition to or in derogation of the Privacy Notice, the following applies to processing of personal data for individuals residing in Singapore:

## **WHAT PERSONAL DATA DO WE COLLECT, WHY AND ON WHICH LEGAL BASIS, HOW DO WE USE IT AND FOR HOW LONG DO WE KEEP IT?**

Where required under applicable law, we will obtain your notified consent for the collection, use or disclosure of your personal data for the purposes set out in this Privacy Notice.

The provision of your personal data to us is voluntary. However, if you do not provide us with certain personal data, we may not be able to provide you with the Services or respond to your requests.

## **WHAT ARE YOUR RIGHTS IN RESPECT OF YOUR PERSONAL DATA?**

Where granted by the applicable privacy law, you have the right to:

- Request from us to access your personal data, which means requesting a copy of the personal data we hold about you. You also have the right to request for information regarding the way in which your personal data has been used and disclosed by us in the 12 months prior to your request.

If applicable to you, you can lodge a complaint with the Personal Data Protection Commission (PDPC) at <https://www.pdpc.gov.sg/>.

## **INFORMATION FROM CHILDREN**

Minors under the age of 21 cannot use our products and services as our customers. If we learn or are notified that it is the case, we will immediately take reasonable steps to delete that information from our records as quickly as possible. If you think a minor is using our products or services as a customer, please contact us at [data-protection-officer@infobip.com](mailto:data-protection-officer@infobip.com).

## CONTACT INFORMATION

If you have any questions on how we use your personal data or if you wish to exercise a certain right or to limit the processing of your personal data or resolve a complaint regarding the processing of your personal data, you can contact our Data Protection Officer either by post at:

Data Protection Officer

Infobip Mobile Services Pte Ltd

50 Raffles Place, #34-01, Singapore Land Tower, Singapore 048623

Or by email at [data-protection-officer@infobip.com](mailto:data-protection-officer@infobip.com).

## HOW OFTEN DO WE UPDATE THIS PRIVACY NOTICE?

The most current version of this Privacy Notice will govern our practices for collecting, processing, and disclosing personal data. We will provide notice of any modifications on this page and where required by law, we will obtain your consent to those changes. You can always check the date of the last update at the beginning of this Privacy Notice.

# South Africa

In addition to or in derogation of the Privacy Notice, the following applies to processing of personal data for individuals or existing juristic persons where the responsible party (i.e. controller) is domiciled in South Africa; or the responsible party (controller) is not domiciled in South Africa but makes use of automated or non-automated means in South Africa, unless the means is only to forward personal data through South Africa and whenever the processing of personal data falls within the ambit of South Africa's Protection of Personal Information Act, 2013 (POPIA):

## DEFINITIONS

When this Privacy Notice is used for South Africa:

The term "**you**" shall include a natural person and a juristic person (company).

The term "**controller**" shall refer to a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information. Reference to "Data Controller" in the Privacy Notice shall be to "Responsible Party" when the processing of personal information falls under the ambit of POPIA.

The term "**Personal Data**" shall refer to information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:

- Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- Information relating to the education or the medical, financial, criminal or employment history of the person;
- Any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- The biometric information of the person;

- The personal opinions, views or preferences of the person;
- Correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- The views or opinions of another individual about the person; and
- The name of the person if it appears with other Personal Information relating to the person or if the disclosure of the name itself would reveal information about the person.

The term "**processor**" shall refer to a person who processes personal information for a responsible party (i.e. controller) in terms of a contract or mandate, without coming under the direct authority of that party. Reference to "Data Processor" in the Privacy Notice shall be to "Operator" when the processing of personal data falls under the ambit of POPIA.

The term "**applicable privacy law**" shall include all laws and regulations applicable to the processing of personal data in South Africa, including the Protection of Personal Information Act, 2013 as amended or replaced from time to time, and the Regulations thereunder.

### **WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?**

When the processing of personal data falls within the ambit of POPIA, the main entity responsible for processing of personal data as described in this Privacy Notice – the controller ("**Responsible Party**") – is Infobip Africa (Pty) Ltd.

For the purposes of South African data protection laws, Infobip Limited has appointed Imraan Kharwa as our Information Officer. Our Information Officer is contactable via the email address [Imraan.Kharwa@infobip.com](mailto:Imraan.Kharwa@infobip.com).

### **HOW DO WE OBTAIN YOUR PERSONAL DATA?**

In addition to what is stated above, please note that the provision of personal data by you is voluntary. However, should you not provide the personal data Infobip may not be able to effectively manage the relationship that we have with you.

### **WHAT PERSONAL DATA DO WE COLLECT, WHY AND ON WHICH LEGAL BASIS, HOW DO WE USE IT AND FOR HOW LONG DO WE KEEP IT?**

In addition to what is stated above, in the case where we process personal data, sometimes that personal data is defined by POPIA as special personal information, in which case we use one of the following legal bases for processing:

- The processing is necessary for the establishment, exercise or defence of a right or obligation in law; or
- The data subject has freely given his, her, or their informed, specific consent to the processing.

### **HOW DO WE CARRY OUT INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA?**

Where the processing of personal data falls under the ambit of POPIA, we will only transfer your personal data outside of South Africa to countries which provide an adequate level of data protection similar to that of POPIA or where we are satisfied that there is an appropriate justification under POPIA for the transfer such as a binding transfer agreement.

To the extent that prior authorisation from the Information Regulator is required for the transfer of special personal information or personal data relating to children to third parties in foreign countries that do not provide an adequate level of data protection, we will ensure that such prior authorisation requirements are complied with, in circumstances where required.

## WHAT ARE YOUR RIGHTS IN RESPECT OF YOUR PERSONAL DATA?

In South Africa, if you have any questions on how we use your personal data or if you wish to exercise a certain right or resolve a complaint regarding the processing of your personal data, you can contact our Information Officer by sending an email to [data-protection-officer@infobip.com](mailto:data-protection-officer@infobip.com).

If applicable to you, you can lodge a complaint with the Information Regulator. If you want to file a complaint or contact the Information Regulator for any other reason, the Information Regulator's contact details are:

### *Information Regulator*

JD House

27 Stiemens Street

Braamfontein

Johannesburg

2001

Email: [POPIAComplaints@info regulator.org.za](mailto:POPIAComplaints@info regulator.org.za)

# Republic of Korea

In addition to or in derogation of the Privacy Notice, the following applies to processing of personal data for individuals residing in Republic of Korea:

## PROCESS AND METHOD OF DESTRUCTION OF PERSONAL DATA

Except as otherwise required by law, personal data is securely disposed of without delay when (i) the data subject revokes his or her consent for our use of the data, (ii) the purpose of our collection and use of the personal data has been accomplished or (iii) the legal retention period has expired. If applicable law requires the preservation of personal data that otherwise would be disposed of, the personal data is transferred to a separate database and then disposed of after the period determined by the applicable law. Personal data is disposed of using a method that is reasonably likely to prevent the personal data from being restored or reused. We will permanently destroy any personal data recorded or saved in electronic format by using a means that can ensure that it cannot be restored and recovered. Personal data printed on paper will be destroyed by shredding or incineration thereof.

## PROVISION OF PERSONAL DATA TO THIRD PARTIES

We will not provide your personal data to third parties in violation of law (such as without your consent, where consent is required). For the purposes stated in the Privacy Notice, we currently do not share your personal data with any third parties in Korea. Should this change in the future, we will update the details of such third parties in the table below:



Recipient's name (contact information)	Items of data to be provided	Purpose for which recipient will use the data	How long recipient will retain and use the data
N/A	N/A	N/A	N/A

#### DELEGATION OF PROCESSING OF PERSONAL DATA

We delegate the processing of your personal data as described below, and the delegates may process your personal data according to the purpose of the delegation:

We delegate processing of personal data as follows:

Delegatee's name	Descriptions of Delegated Work
Salesforce.com Inc.	Provision of CRM platform.
Oracle Corporation	Provision of marketing platform.
Zendesk, Inc.	Provisioning cloud-based customer service software and support ticketing system/help desk solution.
Atlassian, Inc.	Provisioning of contracted Cloud Products (e.g., Jira, Slack, etc.).
DocuSign, Inc.	Provision of document management.
Gainsight, Inc.	Provisioning of digital behavior data on users logged in to INFOBIP web interface and facilitates in-app communication.
FullStory, Inc.	Provisioning of web analytics, user session recordings and digital behavior data for user interface optimizations.
Workday Ltd	Provision of recruitment tool.
Microsoft Ireland Operations Limited	Provisioning of cloud services for storage and computing, networking, monitoring and analytics, including proxying and balancing; supporting services for Text-to-Speech (TTS).
Amazon Web Services, Inc	Provisioning of cloud services for storage and computing, networking, monitoring and analytics, including proxying and balancing; supporting services for Text-to-Speech (TTS).
Google LLC	Provisioning of cloud services for storage and computing, networking, monitoring and analytics, including proxying and balancing; supporting services for Text-to-Speech (TTS).
GoodData Ireland Limited	Product analytics

Delegatee's name	Descriptions of Delegated Work
Infobip Affiliates – The list of Affiliates is available <a href="#">here</a>	Provisioning of cloud services for storage and computing, networking, monitoring and analytics, including proxying and balancing; supporting services for Text-to-Speech (TTS).

## OVERSEAS TRANSFER OF PERSONAL DATA

Specifically, we transfer personal data overseas as follows:

Recipient (Contact Information of Information Manager)	Country to which Your Personal Data is to be Transferred	Time and Method of Transfer	Types of Your Personal Data to be Transferred	Purposes of Use by Recipients	Period of Retention of Use by Recipient
Infobip Affiliates	<a href="#">The list of Affiliates is available here</a>	Transmission of data through information network as needed from time to time	[All items listed in the above]	Provisioning of customer care and technical support.	Until the purpose is achieved

## MEASURES TO ENSURE THE SECURITY OF PERSONAL DATA

### 1) Managerial Measures

- We appointed a Chief Privacy Officer ("CPO") to ensure that data subjects' Personal information is processed in conformity with Korean privacy laws. We have established and implemented an internal management plan to this end.
- We have established and implemented Personal information protection education plans for our employees, delegates and others who are directly in charge of processing Personal information.

### 2) Technical Measures

- We control access to Personal information, and restrict and manage the access right.
- We record the details of the management of access right to Personal information, and retain such records for a certain period of time.
- We have installed and operated an intrusion blocking/prevention system to prevent any unauthorized access to Personal information. In addition, a safe access measures, including a virtual private network, has been implemented to control the access from the outside.
- At the time of transmitting, receiving and storing Personal information, including sensitive information and unique identification information, we take encryption measures required under applicable Korean privacy laws and regulations.
- We install and periodically update programs to fix security defects in software, including operating systems.
- We keep the records of access to the Personal information processing system in a safe manner for a certain period of time.

### 3) Physical Measures

- We take physical access prevention measures, including restrictions on access and placing locks, storing Personal information in hard copies in a safe manner.

## RIGHTS OF DATA SUBJECTS

Irrespective of the legal basis mentioned in the Privacy Notice, we will obtain consent from you when necessary.

You may exercise your rights as a data subject through your legal representative or agent who is delegated by you. In such case, the legal representative and agent must submit a documentation evidencing that he or she is duly authorized by you such as a power of attorney.

## DISABLING COOKIES

You can prevent the use of cookies at any time with effect for the future by setting your browser so that no cookies or only certain cookies are permitted or so that you are notified as soon as cookies are sent. An example of the installation method (in the case of Internet Explorer): The tool button on the upper part of the web browser > Internet Option > Personal data.

## CONTACT

If you have any questions or comments about the Privacy Policy, if you need to report a problem, or if you would like us to update, amend, or request deletion of the information we have about you, please contact our Chief Privacy Officer (or department in charge of personal data protection) at:

Department in Charge of Protection of Personal information

Name of Department: Corporate Privacy

E-mail: [data-protection-officer@infobip.com](mailto:data-protection-officer@infobip.com)

# Thailand

In addition to or in derogation of the Privacy Notice, the following applies to processing of personal data for individuals residing in Thailand pursuant to the Personal Data Protection Act B.E. 2562 (2019) (“**PDPA**”):

- Personal data described under this Privacy Notice is generally required for our business operation, for compliance with the contractual obligations we have with you, or for compliance with our legal obligations. In certain cases, failure to provide your personal data may result in us not being able to provide you with our Services, or to comply with our legal obligations.
- In addition to the rights in respect of your personal data as described in Section 9 of this Privacy Notice, where you believe that our processing of your personal data is in violation or not in compliance with the law you are also entitled to lodge a complaint to a competent authority in Thailand.
- Contact information: Where we are a data controller processing personal data of a Thai data subject, the following are the contact details:
  - Data Controller:
    - Infobip (Thailand) Limited
    - Address: 1788 Singha Complex Building, Room 1902, 19<sup>th</sup> floor, New Petchaburi Road, Bang Kapi, Huai Khwang, Bangkok 10310
    - Phone number: +66 2 651 9384 / +668 3597 8588
    - Email: [data-protection-officer@infobip.com](mailto:data-protection-officer@infobip.com)

## INFORMATION FROM CHILDREN

Children under 20 except in cases where one becomes sui juris upon marriage, provided that the marriage is made in accordance with the provisions of Section 1448 of the Thailand Civil and Commercial Code (part III) cannot use our products and services as our customers. If we learn or are notified that it is the case, we will immediately take reasonable steps to delete that information from our records as quickly as possible. If you think a child under 20 is using our products or services as a customer, please contact us at [data-protection-officer@infobip.com](mailto:data-protection-officer@infobip.com).

# United Arab Emirates

In addition to or in derogation of the Privacy Notice, the following applies to processing of personal data for individuals residing in the UAE:

Where applicable, the controller is Infobip Gulf FZ LLC (20714), EIB Building No.1, Office 302, Dubai Internet City, P.B 500284, Dubai, United Arab Emirates.

Whilst we will continue to rely on legitimate interests as our lawful basis for processing for the purposes of complying with the GDPR, for the purposes of complying with UAE Federal Decree-Law No. 45 of 2021 regarding the Protection of Personal Data (“PDPL”), we will seek your express consent to process your personal data in each case where:

- We rely on legitimate interests within the Privacy Notice; and
- Where an alternative lawful basis for processing is not available (including, but not limited to, performance of a contract).

Subject to certain limited exceptions, where we rely on your consent, you will have the right to withdraw that consent at any time.

# United States

## CALIFORNIA

This section provides California residents with additional information regarding our collection, use and disclosure of their personal information, as well as their privacy rights, under California privacy laws, including as required under the California Consumer Privacy Act (“CCPA”) (“California Privacy Supplement”).

This California Privacy Supplement only applies to our processing of personal information that is subject to the CCPA.

## CATEGORIES OF PERSONAL INFORMATION COLLECTED AND DISCLOSED

While our processing of personal information varies based upon our relationship and interactions with you, the table below identifies, generally, the categories of personal information (as defined by the CCPA) that Infobip has collected about California residents in the preceding 12 months, as well as the categories of third parties to whom Infobip may disclose that personal information for a business or commercial purpose (e.g. to a service provider).

CATEGORIES OF PERSONAL INFORMATION COLLECTED BY INFOBIP	CATEGORIES OF THIRD PARTY DISCLOSURES FOR A BUSINESS OR COMMERCIAL PURPOSE
<p><b>Identifiers</b> A name, alias, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.</p>	<ul style="list-style-type: none"> <li>• Advertising networks</li> <li>• Communication service providers</li> <li>• Data analytics providers</li> <li>• Service providers</li> <li>• Social networks</li> <li>• Affiliates and subsidiaries</li> <li>• Business clients</li> <li>• Advisors and agents</li> <li>• Others as required by law, or authorized or directed by you</li> </ul>
<p><b>Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))</b> A name, signature, contact information, legal eligibility to work in US (for job applicants), experience and any other information you provide to us in your resume (for job applicants), bank account number or any other financial information (for clients only).</p>	<ul style="list-style-type: none"> <li>• Service providers</li> <li>• Affiliates and subsidiaries</li> <li>• Advisors and agents</li> <li>• Others as required by law, or authorized or directed by you</li> </ul>
<p><b>Protected classification characteristics under California or federal law</b> We collect some information that is considered a protected classification under California or federal law, such as your gender, date of birth, citizenship, marital status, and disability status.</p>	<ul style="list-style-type: none"> <li>• Service providers</li> <li>• Affiliates and subsidiaries</li> <li>• Advisors and agents</li> <li>• Others as required by law, or authorized or directed by you</li> </ul>
<p><b>Internet or other electronic network activity information</b> Including but not limited to browsing history, search history, information on a consumer’s interaction with an internet website, application, or advertisement including other usage data related to your use of any of our Services or other online services.</p>	<ul style="list-style-type: none"> <li>• Advertising networks</li> <li>• Data analytics providers</li> <li>• Service providers</li> <li>• Social networks</li> </ul>
<p><b>Geolocation data</b> Location information about a particular individual or device (e.g. inferred through IP address).</p>	<ul style="list-style-type: none"> <li>• Advertising networks</li> <li>• Data analytics providers</li> <li>• Service providers</li> <li>• Affiliates and subsidiaries</li> <li>• Advisors and agents</li> <li>• Others as required by law, or authorized or directed by you</li> </ul>

<p><b>Professional or employment-related information</b></p> <p>Current or past job history or performance evaluations.</p>	<ul style="list-style-type: none"> <li>• Service providers</li> <li>• Affiliates and subsidiaries</li> <li>• Advisors and agents</li> <li>• Others as required by law, or authorized or directed by you</li> </ul>
<p><b>Education information</b></p> <p>Information about an individual’s educational history, such as the schools attended, degrees you were awarded, and associated dates.</p>	<ul style="list-style-type: none"> <li>• Service providers</li> <li>• Affiliates and subsidiaries</li> <li>• Advisors and agents</li> <li>• Others as required by law, or authorized or directed by you</li> </ul>
<p><b>Inferences drawn from other personal information to create a profile about a consumer</b></p> <p>Including inferences drawn from any of the information identified above to create a profile reflecting a consumer’s preferences, characteristics, behavior or attitudes. For example to create a profile reflecting a consumer’s preferences, behavior on website or web interface.</p>	<ul style="list-style-type: none"> <li>• Advertising networks</li> <li>• Data analytics providers</li> <li>• Service providers</li> <li>• Social networks</li> <li>• Affiliates and subsidiaries</li> <li>• Advisors and agents</li> <li>• Others as required by law, or authorized or directed by you</li> </ul>
<p><b>Sensitive personal information</b></p> <p>In limited circumstances, we may collect:</p> <p>Social security, driver’s license, state identification card, or passport number.</p> <p>Account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.</p> <p>Racial or ethnic origin, religious or philosophical beliefs, or union membership.</p> <p>The contents of a consumer’s mail, email, and text messages unless the business is the intended recipient of the communication.</p>	<ul style="list-style-type: none"> <li>• Service providers</li> <li>• Affiliates and subsidiaries</li> <li>• Advisors and agents</li> <li>• Others as required by law, or authorized or directed by you</li> </ul>

**DISCLOSURE TO PROTECT US OR OTHERS**

In addition to what is disclosed in the table above, we may access, preserve, and disclose each of the categories listed in the table above to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our, or others’ rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

For purposes of the CCPA, Infobip does not “sell” or “share” personal information or sensitive personal information, including that of minors under 16 years of age.

## SOURCES OF PERSONAL INFORMATION

In general, we may collect the categories of personal information identified in the table above from the following categories of sources:

- Directly from you (e.g. through our website forms, registration, events or Contact Sales)
- Recruitment agencies
- Data analytics providers
- Social and professional/business networks (e.g., LinkedIn)
- Internet service providers
- Automatically through cookies and pixels
- Operating systems and platforms
- Business customer/client/contacts

## PURPOSES OF COLLECTION, USE, DISCLOSURE AND PROCESSING

As described in more detail in Section 5 of our Privacy Notice, we collect, use and otherwise process the above personal information in order to provide our Services to you, respond to and fulfil your orders and requests, as otherwise directed or consented to by you, and for the following business or commercial purposes:

- Services and customer support (including technical support)
- Marketing and advertising
- Operating the platform services (including to manage traffic with the purpose of transmitting customer's communications toward or from telecom operators and other communication networks, in order to handle customer's enquiries and to calculate charges)
- Improve our products and Services and analytics
- Customization and personalization
- Loyalty/rewards program
- Planning and managing events
- Research and surveys
- Security and protection of rights
- Legal proceedings and obligations
- General business and operational support

## SENSITIVE PERSONAL INFORMATION

Notwithstanding the purposes described above, we do not use or disclose sensitive personal information beyond the purposes authorized by the CCPA. Accordingly, we only use and disclose sensitive personal information as reasonably necessary (i) to perform our services requested by you, (ii) to help ensure security and integrity, including to prevent, detect, and investigate security incidents, (iii) to detect, prevent and respond to malicious, fraudulent, deceptive, or illegal conduct, (iv) to verify or maintain the quality and safety of our services, (v) for compliance with our legal obligations, (vi) to our service providers who perform services on our behalf, and (vii) for purposes other than inferring characteristics about you,

## RETENTION

We retain the personal information we collect only as reasonably necessary for the purposes described above or otherwise disclosed to you at the time of collection. For example, we will retain your profile and account data for as long as you have an active account with us, or transactional data for as long as necessary to comply with our tax, accounting and recordkeeping obligations, administer applicable returns and warranty programs, and for research, development and safety purposes, as well as an additional period of time as necessary to protect, defend or establish our rights, defend against potential claims, comply with legal obligations and requirements.

## PRIVACY RIGHTS FOR CALIFORNIA RESIDENTS

Under the CCPA, California residents have the following rights (subject to certain limitations):

- **Opt out of sales and sharing.** California residents have the right to opt-out of our sale and sharing of their personal information. However, as stated above we do not sell or share personal information.
- **Limit uses and disclosures of sensitive personal information.** California residents have the right to limit certain uses or disclosures of sensitive personal information to those uses authorized by the CCPA. However, as stated above we do not use or disclose sensitive personal information beyond the permitted purposes set forth under the CCPA.
- **Deletion.** California residents have the right to request deletion of their personal information, subject to certain exceptions.
- **To know/access.** California residents have the right to know what personal information we have collected about them, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom we disclose personal information, and the specific pieces of personal information we have collected about them.
- **Correction.** California residents have the right to request correction of inaccurate personal information.
- **Non-Discrimination.** California residents have the right not to receive discriminatory treatment by us for exercising their rights conferred by the CCPA.

#### **SUBMITTING CCPA REQUESTS.**

California residents may exercise their CCPA privacy rights as set forth by submitting CCPA requests to access/know, correct and delete their personal information maintained by us, by emailing us at [data-protection-officer@infobip.com](mailto:data-protection-officer@infobip.com).

#### **AUTHORIZED AGENT**

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. Authorized agents may initiate a request on behalf of another individual by emailing us at [data-protection-officer@infobip.com](mailto:data-protection-officer@infobip.com). Authorized agents will be required to provide proof of their authorization and we may also require that the relevant consumer directly verify their identity and the authority of the authorized agent.

#### **VERIFICATION**

To protect your privacy, we will take the following steps to verify your identity before fulfilling your request by matching the information provided by you with the information we have in our records. Your request must:

- Provide sufficient information that allows us to reasonably verify you are the individual about whom we collected personal information or an authorized representative.
- Describe your request with sufficient details that allows us to properly understand, evaluate, and respond to it.

If we are unable to adequately verify a request, we will notify the requestor. We will process such requests in accordance with applicable laws.

#### **ACCESSIBILITY**

This Privacy Notice uses industry-standard technologies and was developed in line with the World Wide Web Consortium's Web Content Accessibility Guidelines, version 2.1.

#### **CONTACT INFORMATION**

For more information about our privacy practices, you may contact us by emailing us at [data-protection-officer@infobip.com](mailto:data-protection-officer@infobip.com).