



**[Last updated: 22/02/2023]**

# Privacy Notice

Last updated: [22/02/2023]

This is the Privacy Notice of Infobip Limited and its subsidiaries and affiliates. At Infobip we aim to do privacy the right way – wherever we operate. We believe that the responsible use of personal data supports business growth and builds strong relationships between partners, consumers, and brands. As a business, we are committed to respecting and protecting the privacy of all individuals with whom we interact.

It is very important to us to be transparent about the personal data we collect about you, how we use such data, and with whom we share it. That is exactly what this Privacy Notice – including Appendix 1 – contains. It is divided into several sections for easier navigation. In addition to this Privacy Notice, we will also sometimes provide you with additional just-in-time privacy information where appropriate.

If you want to review first our simplified plain language overview of some of our key privacy practices, please see [HERE](#).

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## 1. DEFINITIONS

We use the following definitions in this notice:

- The term **“Infobip”** or **“us”** or **“we”** or **“our”** refers to the company **Infobip Limited** as well as to its **subsidiaries and affiliates**. Occasionally, we might also use the term **“Infobip Group”** to refer to Infobip Limited and its subsidiaries and affiliates.
- The term **“you”** refers to a natural person (an individual) whose personal data Infobip collects and processes.
- The term **“Services”** means Infobip’s cloud-based communication (CPaaS – Communications Platform-as-a-Service and SaaS – Software-as-a-Service) and other products and services.
- The term **“personal data”** means any information about you from which you can be identified, directly or indirectly.
- The term **“controller”** means the organisation which determines the purposes and means of the data processing and is responsible for processing such data in a manner consistent with the applicable privacy law.
- The term **“processor”** means an organisation who processes personal data on behalf of the controller.
- The term **“applicable privacy law”** means all laws and regulations applicable to the processing of given personal data (e.g. the General Data Protection Regulation (EU) 2016/679, the UK GDPR, or the UK Data Protection Act 2018). Please see the country-specific addenda for more information.

## 2. ABOUT INFOBIP SERVICES

Infobip is a Communications Platform-as-a-Service (CPaaS) and Software-as-a-Service (SaaS) provider. While providing Services to our customers, we act either as the controller or the processor, depending on the situation.

### *Our activities as processor*

Our customers are mainly companies that integrate our Services into their business operations through their own software applications (via API) or by using Infobip Portal, our web interface. By using our cloud communications platform, our customers are able to send or exchange their communications with their end-users using different communication channels (SMS, email, voice etc.). We are not in a direct relationship with our customers’ end-users, so we distribute these communications through telecom operators and other communications providers. When we do this, we act as the processor on behalf of our customers, and process the relevant data for the sole purpose of providing our Services to them. We do that within limits and according to customers’

instructions and in line with the Services terms and conditions, agreement for Services, or data processing or similar agreement concluded with the customer.

For example, when you, as an end-user of our customer are the recipient of communication that our customer sent you by using our platform (such as an SMS message), we send that customer's communications acting on behalf of our customer. That means that the customer is the controller, and Infobip is the processor. Any request we may receive from customers' end-users regarding their rights related to our activities taken on behalf of our customers will be forwarded to customers, or the end-users will be asked to contact them directly.

#### *Our activities as controller*

This Privacy Notice describes the activities which Infobip undertakes as controller. Infobip is a controller when we process personal data for our own purposes and do not act on behalf of someone else. We are committed to processing that data as described in this Privacy Notice and respecting all obligations arising from the applicable privacy law.

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

The main entity responsible for processing of personal data as described in this Privacy Notice – the controller – is Infobip Limited, 35-38 New Bridge Street, Fifth Floor, London EC4V 6BW, United Kingdom with a registration number 7085757.

For the purposes of EU data protection laws, Infobip Limited has appointed its EU-based Data Protection Officer ('DPO') as our EU Representative. Our DPO is contactable via the email address [data-protection-officer@infobip.com](mailto:data-protection-officer@infobip.com).

Please note that depending on the specific contractual agreement applicable to you and the given processing activity, another Infobip subsidiary or affiliate may be a controller for your personal data. Contact details of all Infobip subsidiaries and affiliates are available at <https://www.infobip.com/offices>.

If you have any questions regarding this Privacy Notice or our privacy practices, you may contact our Privacy team and Data Protection Officer via the email address [data-protection-officer@infobip.com](mailto:data-protection-officer@infobip.com).

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

Most of the personal data we process is provided to us directly by you when you for example use our Services, visit our website, register for an event, participate in our research initiatives, submit an application form, or otherwise communicate with us.

We also receive personal information from other sources, such as in the following situations:

- If you are employed by or represent one of our customers or suppliers they may provide us with certain information so that you can use our Services
- If you are an end-user of one of our customers they may provide us with certain information in order to use our Services
- If you participate in our market research, we may receive information from our third-party provider related to that research

- If you visit our website or use our Services, we automatically collect certain information, such as your Internet protocol (IP) address, user settings, cookie identifiers, and other unique identifiers, browser or device information, and location information (including approximate location derived from IP address). For more information about how we collect data through cookies please visit our [Cookie Policy](#)
- If you apply for a job, we may receive information from providers of background check services, or collect information from LinkedIn or other publicly available sources or from data enrichment providers (where permitted by local law)
- If you are named as a referee by our job applicant, we may receive certain information so that we can connect with you as part of our recruitment process.

## 5. 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 When we provide Services to our customers

In this section, you will find information on the processing of personal data when we provide Services to our customers.

It provides details on how we are processing your data if you:

- As an individual are our customer
- Are working for or on behalf of our customer, in which case you are either:
  - An “**account user**” (an individual authorized by the customer to log into their account and utilize Infobip Services)
  - A “**business contact**” (a customer’s representative or any other individual acting as a contact point between the customer and Infobip)
- Are our customer's “**end-user**” (an individual that receives communications from or sends it to our customer).

#### 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

**What personal data do**

Infobip collects “**account data**”, which is all data essential for successfully maintaining a business relationship with a customer such as information needed to create customer’s account, to allow customer to use Infobip Services, or to bill the customer accordingly. Specific data types include:

<p><b>we collect?</b></p>	<ul style="list-style-type: none"> <li>• Registration details of a customer and account users (e.g. name and surname, (business) address, phone number, email address, company’s name and industry, business role, as well as login details)</li> <li>• 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)</li> <li>• Business contacts’ details (e.g. name and surname, (business) address, phone number and email address, company’s name and industry, and business role)</li> <li>• “Customer support data” (i.e. customer support communication including the content of customer support tickets).</li> </ul>
<p><b>How do we collect it?</b></p>	<ul style="list-style-type: none"> <li>• Directly from you or from our due diligence provider, if you are an individual.</li> <li>• Directly from you or via your organisation, if your organisation is our customer.</li> </ul>
<p><b>Why do we collect it, under which legal basis, and how do we use it?</b></p>	<p>We collect and use <b>account data</b> to:</p> <ul style="list-style-type: none"> <li>• Sign and administer agreements with our customers</li> <li>• Create customers’ accounts and enable their account users to use our Services</li> <li>• Keep customers’ accounts secure and provide customer care and support</li> <li>• Share relevant information about our products and services, maintain and improve our business relationships with customers, and exercise our rights and fulfill our obligations arising from these business relationships</li> <li>• Assess, by conducting a due diligence process, whether we can enter into a contractual agreement with a prospective customer. We might use your identification data as part of the process. Whenever due diligence is conducted, we will separately inform you of precise details about the processing.</li> </ul> <p>Conducting these activities is our legitimate interest in the sense of providing our Services to your organisation. However, if you personally are our contractual counterpart, we process your data because it is necessary for the performance of an agreement for Services or to provide assistance at your request prior to entering into the agreement.</p>
<p><b>How long do we keep it?</b></p>	<ul style="list-style-type: none"> <li>• Personal data of account users and business contacts are retained for twelve (12) months after the end of our business relationship with the customer.</li> <li>• Personal data of individuals who are our customers are retained for seven (7) years after the end of our business relationship.</li> </ul>

	<ul style="list-style-type: none"> <li>• Customer support data is retained for seven (7) years after the resolving of the support request.</li> </ul> <p><b>Account data</b> will be generally kept as per the stated deadlines. However, we might be required to retain this data for a different time period in certain circumstances if prescribed by specific local laws, when requested by authorities, or if needed to defend our legal rights. Please see Section 11 for more details.</p>
<p>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>	
<p><b>What personal data do we collect?</b></p>	<p>Infobip collects “<b>communications-related data</b>” that includes:</p> <ul style="list-style-type: none"> <li>• “<b>Communications content</b>”: message text, voice, video or audio media, documents, or images exchanged between the customer and their end-users via Infobip Services</li> <li>• “<b>Traffic data</b>”: data that is processed for the transmission of a communication exchanged by using our Services or for billing related to that communication. It includes information on the communication itself (e.g. routing, type, duration and time of communication) and on the source and destination of the communication (including the customer’s end-users’ phone number or e-mail address depending on the Services provided).</li> </ul> <p>We also collect “<b>usage data</b>”, which is information created during your use of our Services. This includes information communicated by the application to Infobip (e.g. IP addresses, information on your usage, routing information), as well as logs of your activities on our platform.</p>
<p><b>How do we collect it?</b></p>	<ul style="list-style-type: none"> <li>• Communications content is received from our customers or their end-users.</li> <li>• Customers’ end-users’ phone numbers or email addresses are received from our customers. Other traffic data is automatically generated or unveiled during the process of transmission of a communication.</li> <li>• Usage data is received directly from you or generated automatically when you use our Services.</li> </ul>
<p><b>Why do we collect it, under which legal basis, and how</b></p>	<p><b>Communications content</b> is collected and processed solely on behalf of a given customer. We act as a processor and in line with the customer’s instructions.</p> <p><b>Traffic data</b> is generally kept in the form of communication detail records, and we collect it and use it to:</p>

do we use it?	<ul style="list-style-type: none"> <li>Manage traffic with the purpose of transmitting customer’s communications toward or from telecom operators and other communications providers and to handle customer’s enquiries.</li> </ul>	<p>If you, as our customer, are an individual, the processing of your personal data is necessary for the performance of our agreement for Services. If our customer is a legal person, we rely on our legitimate interest to provide Services to our customers.</p>
	<ul style="list-style-type: none"> <li>Troubleshoot and detect problems with the network, prevent fraud and other illicit activities, and keep our Services secure. When conducting these activities, we might also leverage <b>account</b> and <b>usage data</b>. The latter is especially relevant for investigating fraudulent activities as it allows us to construct the timeframe of account user’s activities in the case of security-related incidents and be able to take adequate steps for mitigation.</li> </ul>	<p>The security of our Services is crucial for us, so for these activities we rely on our legitimate interest to maintain and improve the security of our network and Services.</p>
	<ul style="list-style-type: none"> <li>Calculate charges and settle interconnection payments with telecom operators and other communications providers or resolve a billing dispute with our customer or our communications provider. In some cases we might also utilize <b>account data</b> as part of this activity.</li> </ul>	<p>The carrying out of these activities is our legitimate interest in the sense of handling payments and resolving financial disputes.</p>
<p>Please note that in order to comply with our legal obligations, we may be obliged to retain records containing <b>communications-related data</b> as stipulated in the relevant national data retention provisions regulating law enforcement matters, and to share them upon government request.</p>		
How long do we keep it?	<ul style="list-style-type: none"> <li>Communications content is retained on behalf of the customer and according to the customer’s instructions.</li> <li>Traffic data containing end-users’ personal data (such as phone number or email address) is deleted from communication detail records twelve (12) months after the end of the month in which the communication took place.</li> <li>Other traffic data (such as time, type, duration of communication, routing details) which do not contain end-users’ personal information is retained in communication detail records for up to ten (10) years following the year of communication.</li> <li>Usage data may be retained for up to three (3) years.</li> </ul>	



	<p><b>Communications-related and usage data</b> will be generally kept as per the stated deadlines. However, we might be required to retain this data for a different time period in certain circumstances if prescribed by specific local laws, when requested by authorities, or if needed to defend our legal rights. Please see Section 11 for more details.</p>
<p><b>5.1.3. To improve our products and Services</b></p>	
<p><b>What personal data do we collect?</b></p>	<p>Infobip collects “<b>behaviour analytics data</b>”, which is data you generate as our customer’s account user during your activity on our website and our platform (e.g. your behaviour records inside our web interface, such as time spent, pages visited, history of your visits and features used as well as your IP address and information about your browser).</p>
<p><b>How do we collect it?</b></p>	<ul style="list-style-type: none"> <li>Behaviour analytics data is received directly from you or generated automatically when you use our Services by placing cookies and trusted tracking technologies on your browser. For more information on how we collect your data through cookies on our website, please visit our <a href="#">Cookie Policy</a>.</li> </ul>
<p><b>Why do we collect it, under which legal basis, and how do we use it?</b></p>	<p>We collect and use <b>behaviour analytics data</b> to:</p> <ul style="list-style-type: none"> <li>Gain insight into the way our current customers are using our platform and Services. Specifically, we take partially automated measurements that include human intervention in order to analyse the way you use the features and tools available on our platform to give you recommendations to improve your performance (e.g. how to better access some feature) and to better satisfy the business needs of our customers</li> <li>Create statistics on the use of our tools to understand which tools have a user-friendly design and which should be enhanced.</li> </ul> <p>The general goal of such activities is to enhance your and your organisation’s messaging execution when communicating with your end-users, and we rely on our legitimate interest when conducting them.</p>
<p><b>How long do we keep it?</b></p>	<p><b>Behaviour analytics data</b> is retained for up to twenty-five (25) months after it was generated.</p>

## 5.2. When you provide your products or services to us

<p><b>What personal data do we collect?</b></p>	<p>If you as our supplier (also known as vendor or service provider) are an individual, we may collect:</p> <ul style="list-style-type: none"> <li>Your name and surname, (business) address, phone number, email address, company's name and industry, business role, as well as your billing information (e.g. billing address, your VAT number, bank account details, and further information if we are legally required to and in accordance with applicable national legislation).</li> </ul> <p>When doing business with our suppliers, we may also collect:</p> <ul style="list-style-type: none"> <li>Personal data related to <b>"business contacts"</b> (supplier's representatives and other individuals acting as a contact point between the supplier and Infobip) such as name and surname, (business) address, phone number, email, company name and industry, and business role.</li> </ul>
<p><b>How do we collect it?</b></p>	<ul style="list-style-type: none"> <li>Directly from you, if you as an individual are our supplier.</li> <li>Directly from you or via your organisation, if your organisation is our supplier.</li> </ul>
<p><b>Why do we collect it, under which legal basis, and how do we use it?</b></p>	<p>We collect and will use this data to:</p> <ul style="list-style-type: none"> <li>Sign and administer an agreement with you or your organisation</li> <li>Get relevant information about your product or services or share relevant information about our business and services with you</li> <li>Maintain and improve our business relationship with you or your organisation as well as exercise our rights and fulfill our obligations arising from the business relationship.</li> </ul> <p>Conducting these activities is our legitimate interest in the sense of purchasing products or services from or collaborating with a supplier that is a legal person. However, if you personally are our contractual counterpart, we process your personal data because it is necessary for the performance of an agreement or for entering into an agreement.</p>
<p><b>How long do we keep it?</b></p>	<ul style="list-style-type: none"> <li>Personal data about business contacts will be deleted twelve (12) months after the end of our business relationship with the supplier.</li> <li>Personal data of individuals who are our suppliers will be deleted seven (7) years after the end of our business relationship.</li> </ul> <p>If prescribed by specific local laws, when requested by authorities, or if needed to defend our legal rights, we might be required to retain this data for a different time period than listed above. Please see Section 11 for more details.</p>

### 5.3. When you contact us with a question about our products and services and when we are looking for new business opportunities

<b>What personal data do we collect?</b>	<p>We may collect your name and surname, contact details (e.g. email address, phone number, country), and business details (e.g. company's name and industry and your business role). We will also collect any other information you choose to provide to us, depending on the nature of our communication.</p>
<b>How do we collect it?</b>	<ul style="list-style-type: none"> <li>• Directly from you when you register on our website to learn more about our business and services (e.g. through "Contact Sales" form), start chatting with us via our chat channel, take steps to enter into a business relationship with us, submit Startup Tribe application form and when you provide to us your contact details when requesting further information.</li> <li>• Indirectly through business and professional networks and databases (such as LinkedIn) or third parties we might employ that supply us with information collected from publicly available sources and data enrichment providers. We only retain the information that will help us reach potential customers or suppliers that could benefit from our services and products, or if we are interested in their products and services.</li> </ul>
<b>Why do we collect it, under which legal basis, and how do we use it?</b>	<p>We collect and use this data to:</p> <ul style="list-style-type: none"> <li>• Communicate with you, answer your questions, and find out if you or your organisation are interested in further cooperation with us, either by using our products and services or by providing your products or services to us</li> <li>• Ensure adequate support within the presales and purchasing process if there is a mutual interest in entering into an agreement.</li> </ul> <p>Such activities represent our legitimate interest to conduct our business. If you personally are our contractual counterpart, we process your data because it is necessary for the performance of a contract or for entering into a contract.</p>
<b>How long do we keep it?</b>	<ul style="list-style-type: none"> <li>• Personal data collected for this purpose will be deleted six (6) months after our last communication unless we enter into a business agreement with you or your organisation.</li> </ul>

### 5.4. When we send you our email or other marketing communications

<b>What personal data do we collect?</b>	<p>We collect your name and surname, and contact details (e.g. email address or phone number). We also gather simple statistics around email openings and clicks.</p>
<b>How do we</b>	<ul style="list-style-type: none"> <li>• Directly from you if you subscribe to receive our newsletters, blogs or our other marketing communications through the webforms available on our website</li> </ul>

<p><b>collect it?</b></p>	<ul style="list-style-type: none"> <li>• Directly from you or via your organisation as part of business-to-business (B2B) marketing if we have an existing business relationship with your organisation</li> <li>• Simple statistics around email openings and clicks are generated automatically via industry standard technologies such as clear gifs when you engage with our emails.</li> </ul>
<p><b>Why do we collect it, under which legal basis, and how do we use it?</b></p>	<p>Our purpose for collecting this data is to:</p> <ul style="list-style-type: none"> <li>• Inform you about our Services, company news, webinars and upcoming events</li> <li>• Gather statistics (email opening and clicks) to help us improve our direct marketing initiatives.</li> </ul> <p>If you subscribe to our email marketing communications, we rely on your consent provided to us when submitting such webforms. For B2B (business-to-business) marketing, we rely on our legitimate interest to maintain and improve our business relationships by informing our existing business partners (e.g. customers and suppliers) about our Services, company news, webinars, and upcoming events via email or other forms of communications.</p> <p>In any case, you may proactively manage your preferences or opt-out of communications (<b>unsubscribe</b>) with Infobip at any time using the unsubscribe link provided in all Infobip’s marketing communications. When you unsubscribe from our marketing communications (i.e. withdraw your consent or object to the processing), we will stop sending you any marketing materials.</p> <p>However, we maintain a so-called “suppression list” that contains only your email address or phone number just to be sure that we do not contact you with unwanted content in the future. We retain this information relying on our legitimate interest to respect the choices of our newsletter recipients.</p>
<p><b>How long do we keep it?</b></p>	<ul style="list-style-type: none"> <li>• Your personal data (name and surname, contact details) are kept for our marketing activities during your or your organisation’s business relationship with us unless you object (B2B).</li> <li>• If you have subscribed directly, then your personal data will be kept for our marketing activities until you unsubscribe.</li> <li>• If you unsubscribe or object, we will only keep a suppression list that includes your contact details (e.g. email address or phone number) to ensure you do not receive any further marketing communication.</li> </ul>
<p><b>5.5. When you register for, attend, or speak at our webinar, business breakfast, developer meetup, or other events</b></p>	
	<p>When you register to attend or when you check in at our business breakfast, webinar, developer meetup, or any other event (“event”), we normally collect your name and surname, contact details (e.g. email, phone number, country), as well as your business details (e.g. company’s name and industry and your business role). If</p>

<p><b>What personal data do we collect?</b></p>	<p>you are participating as a speaker, you might also be asked to provide your brief CV and an official photo of you.</p> <p>For live events, we may also ask you information about the time and place of your arrival as well as accommodation details and dietary requirements you may have. If you require us to provide you with an invitation letter, or you need to get a letter of guarantee to be able to get a visa, we will collect the necessary information required by applicable law (such as your name and surname, address, date of birth, or passport details).</p> <p>We may collect photos, audio, and video material from our events.</p> <p>When registering for and attending Infobip Shift Conference, separate rules may apply. For more information please review the <a href="#">Infobip Shift Privacy Notice</a>.</p>							
<p><b>How do we collect it?</b></p>	<ul style="list-style-type: none"> <li>• Directly from you when you register to attend or check in at our event.</li> <li>• Sometimes your organisation will send us your contact details to attend our event on their behalf, and we will send you an invitation with the link for registration.</li> </ul>							
<p><b>Why do we collect it, under which legal basis, and how do we use it?</b></p>	<p>We collect and use this data:</p> <table border="1" data-bbox="352 965 1383 1986"> <tr> <td data-bbox="352 965 978 1144"> <ul style="list-style-type: none"> <li>• If you register for a webinar, to provide you with the webinar details in advance, to remind you of the webinar and email you the recording of the webinar subsequently.</li> </ul> </td> <td data-bbox="978 965 1383 1473" rowspan="2"> <p>The legal basis we rely on is your consent, provided when you submit your details through our registration forms. When we collect any information about dietary requirements, we also rely on your consent.</p> </td> </tr> <tr> <td data-bbox="352 1144 978 1473"> <ul style="list-style-type: none"> <li>• If you register to attend or speak at our live event, to ensure your place at the event, to communicate to you all the relevant information before your arrival and during the event, and to facilitate the event (e.g. help you with information about the location of our event, accommodation, travel or other logistic details related to the event).</li> </ul> </td> </tr> <tr> <td data-bbox="352 1473 978 1986"> <ul style="list-style-type: none"> <li>• To support you with getting a visa for an event that you wish to attend, including to send an invitation, support letter or letter of guarantee.</li> </ul> </td> <td colspan="2" data-bbox="978 1473 1383 1986"> <p>We collect this information only to respond to your request and we rely on your consent provided when you submit your personal data for this purpose.</p> <p>However, we may be obligated to share such document with government authorities and to retain it for a certain period of time. We do this to comply with our legal obligation.</p> </td> </tr> </table>		<ul style="list-style-type: none"> <li>• If you register for a webinar, to provide you with the webinar details in advance, to remind you of the webinar and email you the recording of the webinar subsequently.</li> </ul>	<p>The legal basis we rely on is your consent, provided when you submit your details through our registration forms. When we collect any information about dietary requirements, we also rely on your consent.</p>	<ul style="list-style-type: none"> <li>• If you register to attend or speak at our live event, to ensure your place at the event, to communicate to you all the relevant information before your arrival and during the event, and to facilitate the event (e.g. help you with information about the location of our event, accommodation, travel or other logistic details related to the event).</li> </ul>	<ul style="list-style-type: none"> <li>• To support you with getting a visa for an event that you wish to attend, including to send an invitation, support letter or letter of guarantee.</li> </ul>	<p>We collect this information only to respond to your request and we rely on your consent provided when you submit your personal data for this purpose.</p> <p>However, we may be obligated to share such document with government authorities and to retain it for a certain period of time. We do this to comply with our legal obligation.</p>	
<ul style="list-style-type: none"> <li>• If you register for a webinar, to provide you with the webinar details in advance, to remind you of the webinar and email you the recording of the webinar subsequently.</li> </ul>	<p>The legal basis we rely on is your consent, provided when you submit your details through our registration forms. When we collect any information about dietary requirements, we also rely on your consent.</p>							
<ul style="list-style-type: none"> <li>• If you register to attend or speak at our live event, to ensure your place at the event, to communicate to you all the relevant information before your arrival and during the event, and to facilitate the event (e.g. help you with information about the location of our event, accommodation, travel or other logistic details related to the event).</li> </ul>								
<ul style="list-style-type: none"> <li>• To support you with getting a visa for an event that you wish to attend, including to send an invitation, support letter or letter of guarantee.</li> </ul>	<p>We collect this information only to respond to your request and we rely on your consent provided when you submit your personal data for this purpose.</p> <p>However, we may be obligated to share such document with government authorities and to retain it for a certain period of time. We do this to comply with our legal obligation.</p>							

	<ul style="list-style-type: none"> <li>To invite you to future events and inform you about our products and services that we think you might be interested in. For that purpose, we maintain former events' participants lists containing only your name and surname, contact details, and business details.</li> </ul>	We rely on our legitimate interest to conduct our business for this purpose. You may object to these communications at any time by using the unsubscribe link provided in all Infobip's communications and we will stop sending you event invitations.
	<ul style="list-style-type: none"> <li>To conduct promotion activities of the events we held, which include the publishing of photos, videos, audio, and texts in online and offline media.</li> </ul>	These activities represent our legitimate interest to conduct our business.
<b>How long do we keep it?</b>	<ul style="list-style-type: none"> <li>Personal data collected when registering for a webinar or a live event (e.g. name and surname, contact details, business details) will be deleted two (2) years after the event.</li> <li>All other personal data collected for the organisation of an event (accommodation, and other logistic data) will be erased within sixty (60) days after the event day.</li> <li>Any invitation, support letter or letter of guarantee will be kept for a period of time determined by the applicable legislation.</li> </ul>	
<b>5.6. When we perform research activities</b>		
<b>5.6.1. When we perform anonymous market research activities</b>		
<b>What personal data do we collect?</b>	We collect your name and surname and email address. However, as this type of research is meant to be anonymous, our intention is to collect only your personal data necessary to send you a questionnaire but not to link the anonymous answers with you in any way.	
<b>How do we collect it?</b>	<ul style="list-style-type: none"> <li>We collect your name and surname and contact details (email address) from business and professional networks (for example LinkedIn), or from our databases if you or your organisation are our customer or supplier.</li> </ul>	
<b>Why do we collect it, under which legal basis, and how</b>	<p>We collect and use this data to:</p> <ul style="list-style-type: none"> <li>Invite you to take a survey by sending you a generic untraceable URL to a survey questionnaire. If you decide to participate and answer our questions, we will not ask you to reveal any personal data as our intention is to keep the answers anonymous. This is done as part of our conducting anonymous market research activities to further improve our products and services and our targeting potential.</li> </ul>	

<b>do we use it?</b>	When searching for your email address, we rely on our legitimate interest. Our intention is to collect only anonymous information through the surveys. However, if you disclose any information about you in your answers, we will rely on your consent. We will not link or attempt to link the provided answers with you nor do we inform other organisations (e.g. your employer) of the answers you provided in any way.
<b>How long do we keep it?</b>	<ul style="list-style-type: none"> <li>We will process the answers you provided in order to have general feedback on our products and services. However, we will never ask you to reveal any personal data in your answers, and if you reveal any personal data in your answers, it will be promptly deleted.</li> </ul>

### 5.6.2 When we perform in-depth market research interviews

<b>What personal data do we collect?</b>	We collect your personal data such as name and surname, email, business role, and name of the organisation you work for. We will also collect any other information you choose to provide during the interview, and the interviews will be recorded and transcribed.
<b>How do we collect it?</b>	<ul style="list-style-type: none"> <li>We collect your name and surname and contact details directly from you or from a third-party provider that we engage to conduct these interviews and find the appropriate participants</li> <li>Any further information (e.g. your opinions on the overall market for certain services) will be collected directly from you by us or by a third-party provider depending on who is conducting the interview.</li> </ul>
<b>Why do we collect it, under which legal basis, and how do we use it?</b>	<p>We collect and use this data to:</p> <ul style="list-style-type: none"> <li>Conduct in-depth market research interviews to understand the broader market situation for the products and services that we offer and for our company overall. Any comments and opinions that you provide will be used only for internal purposes to improve our products, services, and business practices.</li> </ul> <p>When conducting these interviews, we rely on your consent.</p>
<b>How long do we keep it?</b>	<ul style="list-style-type: none"> <li>Recordings of interviews and associated personal data (e.g. contact details and personal data within the interview transcripts) will be deleted one (1) year after the interview date.</li> </ul>

### 5.6.3. When we perform user experience research

<b>What personal data do we collect?</b>	We collect your personal data such as name and surname, email, company name, and business role. We might record and transcribe interviews that we conduct.
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<p><b>How do we collect it?</b></p>	<ul style="list-style-type: none"> <li>• We collect your name and surname and contact details (email address) from our databases if you or your organisation are our customer to invite you to be part of our research hub. If you have registered to participate in research activities at a third-party provider, we may collect the same types of data from them to invite you</li> <li>• If you apply to be part of our research hub and participate in our research, we will collect the personal data directly from you through a third-party provider who will process it on our behalf</li> <li>• We collect any further information (e.g. your feedback on our products) directly from you as part of the research.</li> </ul>					
<p><b>Why do we collect it, under which legal basis, and how do we use it?</b></p>	<p>We collect and use the data to:</p> <table border="1" data-bbox="352 707 1386 1738"> <tr> <td data-bbox="352 707 871 1447"> <ul style="list-style-type: none"> <li>• Invite you to be part of our research hub.</li> </ul> </td> <td data-bbox="871 707 1386 1447"> <p>When inviting you (our customers or business contacts) to be part of our research hub, we send you an email with a link to apply. For this activity we rely on our legitimate interest to improve our products and Services. We will contact you only about research related to the product or Services you already use or have used.</p> <p>When you apply to a third-party provider to participate in research activities, we may contact you to be part of our research hub and participate in our user experience research via a third-party provider's platform. We will rely on your consent or the contract for personal data collected and processed, depending on the circumstances.</p> </td> </tr> <tr> <td data-bbox="352 1447 871 1738"> <ul style="list-style-type: none"> <li>• Conduct user experience research activities and obtain your feedback to improve our products and Services.</li> </ul> </td> <td data-bbox="871 1447 1386 1738"> <p>Your participation is completely voluntary. If you decide to be a part of our research hub or to participate in our research, we will rely on your consent or the contract for personal data collected and processed, depending on the circumstances.</p> </td> </tr> </table> <p>The research may be recorded, and we will take notes on your comments and actions. The research results, recordings, and notes are used only for improving our products and Services and will be shared internally with our product design and development teams.</p>		<ul style="list-style-type: none"> <li>• Invite you to be part of our research hub.</li> </ul>	<p>When inviting you (our customers or business contacts) to be part of our research hub, we send you an email with a link to apply. For this activity we rely on our legitimate interest to improve our products and Services. We will contact you only about research related to the product or Services you already use or have used.</p> <p>When you apply to a third-party provider to participate in research activities, we may contact you to be part of our research hub and participate in our user experience research via a third-party provider's platform. We will rely on your consent or the contract for personal data collected and processed, depending on the circumstances.</p>	<ul style="list-style-type: none"> <li>• Conduct user experience research activities and obtain your feedback to improve our products and Services.</li> </ul>	<p>Your participation is completely voluntary. If you decide to be a part of our research hub or to participate in our research, we will rely on your consent or the contract for personal data collected and processed, depending on the circumstances.</p>
<ul style="list-style-type: none"> <li>• Invite you to be part of our research hub.</li> </ul>	<p>When inviting you (our customers or business contacts) to be part of our research hub, we send you an email with a link to apply. For this activity we rely on our legitimate interest to improve our products and Services. We will contact you only about research related to the product or Services you already use or have used.</p> <p>When you apply to a third-party provider to participate in research activities, we may contact you to be part of our research hub and participate in our user experience research via a third-party provider's platform. We will rely on your consent or the contract for personal data collected and processed, depending on the circumstances.</p>					
<ul style="list-style-type: none"> <li>• Conduct user experience research activities and obtain your feedback to improve our products and Services.</li> </ul>	<p>Your participation is completely voluntary. If you decide to be a part of our research hub or to participate in our research, we will rely on your consent or the contract for personal data collected and processed, depending on the circumstances.</p>					



<b>How long do we keep it?</b>	<ul style="list-style-type: none"> <li>Recordings of interviews and associated personal data (e.g. contact details and personal data within the interview transcripts) will be deleted one (1) year after the interview date.</li> </ul>
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### 5.7. When you visit our website

<b>What personal data do we collect?</b>	When visiting our website, by placing cookies, we may collect your IP address, your browser type and associated information, the pages you have visited and the order you visited them, as well as whether you are a new or returning visitor.
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<b>How do we collect it?</b>	<ul style="list-style-type: none"> <li>Directly from you when you browse our website by placing cookies on your browser. The cookies are either placed automatically (necessary cookies) or only once you have consented to them (functional, analytical, and advertising cookies). Please review our <a href="#">Cookie Policy</a> for more information.</li> </ul>
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<b>Why do we collect it, under which legal basis, and how do we use it?</b>	<p>We collect and use this data to:</p> <ul style="list-style-type: none"> <li>Maintain and improve our website and overall business.</li> </ul> <p>When doing so, we rely either on our legitimate interest to ensure the functioning of the website (for necessary cookies) or on your consent (for functional, analytical, and advertising cookies).</p> <p>Please review our <a href="#">Cookie Policy</a> for more information on how you can manage (including to withdraw) your cookie consent.</p>
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<b>How long do we keep it?</b>	<ul style="list-style-type: none"> <li>This depends on the specific types of cookies that were either placed automatically (necessary cookies) or that you have consented to be placed (other categories). Please review our <a href="#">Cookie Policy</a> for more details on the retention periods for specific types of cookies.</li> </ul>
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### 5.8. When you apply for a job or internship with us or when you sign up to receive job posting updates

<b>What personal data do we collect?</b>	<p>When you apply for a job or internship with us we collect:</p> <ul style="list-style-type: none"> <li>Your name and surname, contact details (email address and phone number) and place of residence as well as information about your education, previous work experience, and any other information you choose to share with us in your resume (CV) or application when expressing interest in joining our team</li> <li>When permitted by applicable law, we may also collect professional information about you from the business networking sites you use (such as LinkedIn) and we may search their content in order to find out more professional information about you or from other sources (e.g. web pages) if your resume or application contains links to such sources</li> <li>If we arrange an interview and you go through our selection process, we may collect further information gathered from you during the interviews, results</li> </ul>
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	<p>of conducted evaluation tests, and interview notes and reviews of our colleagues who interviewed you. We may also collect information about your professional experience from your referees, if you indicated them</p> <ul style="list-style-type: none"> <li>• If you are a successful candidate, we might also conduct a background check if permitted by the legislation. We will provide a separate privacy notice to you prior to conducting it.</li> </ul> <p>When you sign up to receive job posting updates, we collect your name and surname as well as your email address.</p>
<p><b>How do we collect it?</b></p>	<ul style="list-style-type: none"> <li>• Directly from you when you submit your resume or application into our recruitment software or when you create an account there to receive job posting updates.</li> <li>• From recruitment agencies we have engaged to help us find potential candidates for open positions or from business networking sites you use such as LinkedIn.</li> <li>• We may collect further information about you during the selection process. This information will be generated by you and by us. For example, you might complete an evaluation test or we might take interview notes or contact your referees.</li> <li>• If you are a successful candidate, we might also collect your personal data from a background check agency if permitted by the legislation.</li> </ul>
<p><b>Why do we collect it, under which legal basis, and how do we use it?</b></p>	<p>We collect and use your personal data to:</p> <ul style="list-style-type: none"> <li>• Find talented individuals who will become part of our global team by enabling you to apply for a job or internship with us in order to assess whether you are a good fit for a position at Infobip</li> <li>• Enable you to sign up to receive job posting updates.</li> </ul> <p>For most activities under these two purposes, we rely on your consent to collect and process your personal data. You can create a profile in our recruitment software accessible on our <a href="#">Careers web page</a> to submit your resume and apply for an available position or to receive job posting updates. When submitting it, you will be asked to provide us with your consent to process your personal data for recruitment purposes for a period specified in the consent form.</p> <p>If you do not submit your resume directly into our recruitment software (e.g. when we receive it from a recruitment agency or when we find your professional details on business networking sites you use), we will send you an email with a link to our recruitment software and you will be asked to provide us your consent to keep your personal data for recruitment purposes. In such cases, we collect your personal data and contact you with an email based on our legitimate interest to find potential job candidates. However, we need your consent for any further processing of your personal data. If you do not provide us with the consent within thirty days following the receipt of the email, we will erase your personal data from our database.</p>

	<p>During the selection process we collect further information in order to review your professional qualifications and interests and be able to choose the best candidate. We also conduct the relevant background checks, to the extent permitted by applicable laws, which include identity verification, right of work verification, education, professional license and previous employment checks, verification of recommendations, checks of company registers and criminal checks. Moreover, for executive roles we will also carry out a reputational check from publicly available sources. For the processing of this information, we rely on our legitimate interest, your consent, or legal obligation depending on the circumstances.</p> <p>If you have been selected as the most suitable candidate for a job position or internship, you will be presented with an offer. If you accept it, we will collect further information to be able to conclude and execute an agreement with you. The further collection and processing of your personal data will be carried out to conclude an employment or internship agreement with you or to take certain steps, at your request, prior to entering into that agreement. You will be presented with an Infobip privacy notice that applies to our staff where you can find relevant privacy information.</p> <p>We collect and process your personal data through the recruitment platform of our processor, Workday Ltd. Your personal data are collected and stored on servers maintained by Workday in data centers located in the European Union. It will be processed by authorized members of the Infobip recruitment team. However, if there is a problem with the platform, the Workday support team may also have access to your personal data in order to help us resolve the problem. If you want to know more details about Workday’s privacy practices, you can refer to the <a href="#">Workday’s Privacy Policy</a>.</p> <p>We may share your personal data within Infobip Group companies (<a href="#">subsidiaries and affiliates</a>). Since we are a global company, we may engage our subsidiaries and affiliates in which we have employed members of our recruitment team in order to complete the recruitment process.</p>
<p><b>How long do we keep it?</b></p>	<ul style="list-style-type: none"> <li>Your recruitment-related personal data will be deleted after the expiration of the period for which you have provided us with your consent (or earlier if you withdraw it). These periods might differ across countries due to local legislation.</li> </ul> <p>If requested by local authorities or if needed to defend our legal rights, we might be required to retain this data for a different time period than stated above. Please see Section 11 for more details.</p> <p>Please note that <b>you have the right to withdraw your consent at any time</b>. If you want to withdraw your consent or to edit your profile, you can do so yourself directly by <a href="#">accessing your profile</a> in our recruitment software. Otherwise, you can always withdraw your consent as well as exercise your other rights by contacting our Data Protection Officer. More information regarding your rights is listed in Section 9 below.</p>

### 5.9. When you reach out to us regarding our social impact initiatives or when we collaborate on such initiatives

<b>What personal data do we collect?</b>	<p>We collect personal data such as your name and surname, contact details, job title, and name of the organisation you work for or represent or in whose activities you participate.</p>
<b>How do we collect it?</b>	<ul style="list-style-type: none"> <li>• Directly from you when you fill out a contact form on our website or reach out to us directly or from an organisation that you work for or that organises activities that you participate in.</li> </ul>
<b>Why do we collect it, under which legal basis, and how do we use it?</b>	<p>We collect and use your personal data to:</p> <ul style="list-style-type: none"> <li>• Answer your queries and analyse and respond to your requests for donations or volunteers</li> <li>• Collaborate on various projects and initiatives, get information on how our grants and donations were utilized, maintain and improve our relationship with your organisation, and evaluate our social impact initiatives.</li> </ul> <p>When you reach out to us with queries and requests, we process your personal data based on your consent. When we receive your personal data from an organisation that you work for or in whose projects you partake, we rely on our legitimate interest to conduct social impact initiatives.</p>
<b>How long do we keep it?</b>	<ul style="list-style-type: none"> <li>• We retain your personal data for as long as needed to fulfill your specific request.</li> <li>• All the personal data of individuals who contact us in their individual capacity will be deleted at the latest one (1) year after the initial communication date.</li> <li>• Personal data related to queries and donation or volunteer requests submitted on behalf of an organisation will be deleted three (3) years after the end of the year when we last communicated.</li> <li>• For supported projects and initiatives, any personal data contained within the legally required documentation will be kept for a period determined by local legislation in order to comply with audit, tax and financial requirements.</li> </ul> <p>If requested by local authorities or if needed to defend our legal rights, we might be required to retain this data for a different time period than stated above. Please see Section 11 for more details.</p>

### 5.10. When you visit our offices or premises

<b>What personal data do</b>	<p>We collect your personal data such as name and surname, email, signature, business role, and name of the organisation you work for or represent. We might also collect your phone number. If you visit one of our offices, we may also collect CCTV</p>
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<b>we collect?</b>	recordings as some of the entrances and common areas might be under CCTV surveillance.
<b>How do we collect it?</b>	<ul style="list-style-type: none"> <li>• Directly from you when you visit one of our offices or our other company's premises.</li> </ul>
<b>Why do we collect it, under which legal basis, and how do we use it?</b>	<p>We collect and use your personal data to:</p> <ul style="list-style-type: none"> <li>• Manage access control to our offices and premises (e.g. signing of a non-disclosure agreement during your first visit) and provide you with additional services while you are visiting us (e.g. bike rental)</li> <li>• Ensure the safety and security of our employees, visitors, and property (CCTV surveillance at the entrances and common areas of some of our offices and premises)</li> <li>• As a visitor to one of our campuses, you can also utilize an Infobip chatbot to find out more about the locations and to get recommendations on things to do and see. If you decide to communicate with one of the chatbots, we will process your phone number.</li> </ul> <p>Most of these activities are conducted based on your consent. The processing of CCTV surveillance data as well as the processing regarding access control are done based on our legitimate interest to protect our premises and staff.</p>
<b>How long do we keep it?</b>	<ul style="list-style-type: none"> <li>• Personal data collected for the purpose of managing the access to our premises is erased as soon as it is no longer needed for that purpose.</li> <li>• When we provide you with additional services during your visit, we will retain your personal data for as long as needed to fulfill your specific request or until you withdraw your consent.</li> <li>• CCTV surveillance recordings are generally deleted ninety (90) days after the recording date, unless prescribed otherwise by the local laws.</li> </ul> <p>However, we might be required to retain this data for a different time period in certain circumstances if prescribed by specific local laws, when requested by authorities, or if needed to defend our legal rights. Please see Section 11 for more details.</p>

## 6. HOW AND WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

We may engage suppliers (also known as vendors or service providers) to help us in the processing of your personal data for the activities that we conduct as a controller and that we describe in this Privacy Notice. Since we are a global company, we may also share your personal data with our subsidiaries and affiliates as part of our daily operations. Any such sharing within the Infobip Group is regulated by intercompany agreements on personal data processing and transfer.

Before engaging any new supplier, we perform a security and privacy assessment. Where such supplier acts as our processor we ensure that the processing of personal data is governed by a written data processing agreement.

Notwithstanding the foregoing, as a rule, we do not share personal data with third parties except when strictly necessary and on a need-to-know basis, such as with:

- Telecom operators and other communications service providers when necessary for the set-up of proper routing and connectivity. We are able to deliver messages that our customers send to their end-users, independent of where they are located, through our connections with telecoms and other communications providers (such as Whatsapp, Viber, Facebook, Kakaotalk, Line, or Telegram).
- Service and technology providers to the extent strictly necessary for them to perform specific actions on our behalf. These might be related both to our Services (e.g. as part of the functionality of our Services) and to our other processes (e.g. utilizing a software provider to manage our job application process).
- Third parties when required to comply with our legal obligations. We may share your personal data with authorised legal authorities due to relevant legislation, such as a judicial proceeding, court order, or legal process served on us (e.g. for criminal procedures) or because of threats to public security, regulatory requirement, or in the context of investigations or bankruptcy. As a communications provider, we are required to retain certain communications-related data for law enforcement purposes and will be required to share that data with authorized law enforcement authorities upon their request. Also, if we are under an obligation to demonstrate compliance with relevant accounting, financial and tax legislation, your data can be shared with auditors and tax authorities for those purposes.
- Advertising partners that we might use as part of our marketing activities. More information is listed in our [Cookie Policy](#) along with an explanation of how to adjust your cookie settings when visiting our website.
- Merger and acquisition stakeholders as part of disclosure in the event of a merger, sale, or other asset transfer. Your information may be transferred as part of such a transaction, as permitted by law or contract.

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

We conduct our business operations globally, and sometimes we need to carry out international transfers of your personal data by providing your personal data to the parties specified in the section above. All international transfers are carried out while ensuring the confidentiality and security of your personal data and in line with the applicable privacy law. This might include specific technical, organisational, and contractual measures. For example, in relation to transfers of personal data outside the European Economic Area, we will complete and execute standard contractual clauses for data transfers where required.

## 8. HOW DO WE SECURE YOUR PERSONAL DATA?

At Infobip, we believe that security and privacy go hand in hand. In order to protect personal data collected and processed by us, we have therefore invested in the development, implementation, and constant improvement of a wide range of technical and organisational security measures. These measures have been implemented in accordance with ISO 27001:2013 standard requirements, and you can read more about them [here](#). The list of our current and up-to-date certificates can be found [here](#).

We take care to train all our staff in the field of privacy and security, starting from their first day in Infobip through the onboarding process and continuously throughout their stay at Infobip.

Before we engage a supplier, we check their security practices and alignment with the applicable privacy law. Once engaged, we continue to assess them on a regular basis.

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

Depending on the applicable privacy law, you may have certain rights with respect to your personal data.

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

- Withdraw your consent to our processing of your personal data (to the extent such processing is based on your consent and consent is the only permissible basis for processing), without affecting the lawfulness of processing based on consent before its withdrawal
- Request from us to access your personal data, which means requesting a copy of the personal data we hold about you
- Ask us to rectify (correct) your personal data that you think is inaccurate and to complete your personal data that you think is incomplete
- Ask us to erase your personal data in certain circumstances
- Ask us to restrict the processing of your personal data in certain circumstances
- If we process your personal data by automated means based on your consent or upon a contractual relation with you, you can exercise the right of data portability
- If we process your personal data upon our legitimate interest, you have the right to object to the processing
  - If you want to object to the processing of your data for marketing purposes, you can do it at any time by using the unsubscribe link provided in our marketing communications
- You may also have specific rights in exceptional cases when we may carry out automated decision-making operations, including profiling.

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 Data Protection Officer by sending an email to the following email address: [data-protection-officer@infobip.com](mailto:data-protection-officer@infobip.com).

If applicable to you, you can lodge a complaint with the supervisory authority of the EU member state of your habitual residence, place of work, or place of the alleged infringement. If you want to file a complaint or contact the relevant data protection authority for any other reason, you may find contact details of EEA data protection authorities at [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).

## 10. DO WE CONDUCT AUTOMATED DECISION-MAKING THAT SIGNIFICANTLY AFFECTS YOU?

We take partially automated measurements that include human intervention in order to analyse the way users of our platform use the features and tools available (e.g. by tracking usage behaviour inside our web interface) in order to give you recommendations to improve your performance (e.g. how to better access certain features).

## 11. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

Your personal data that has been collected based on your consent will be kept for a period specified in the consent. If you wish to withdraw your consent for the processing of your personal data for any purpose and to delete your data, you can do that at any time by sending an email to [data-protection-officer@infobip.com](mailto:data-protection-officer@infobip.com). Regarding your personal data that is not subject to your consent, we will only keep it for as long as necessary to fulfill the purposes for which it was collected before making it non-identifiable (anonymous) or deleting it, as required by law.

Specific retention periods are listed under the respective activities in section 5 of this Privacy Notice. The retention periods listed are the standard default periods. In some cases, exceptions apply due to local laws related to law enforcement, tax, or other purposes. Additionally, if legal matters such as litigation, law enforcement requests, or government investigations require us to preserve records, including those containing personal information, for longer periods than listed in section 5, then we will delete the records in question when we are no longer legally obligated to retain them.

## 12. INFORMATION FROM CHILDREN

Children under 16 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 16 is using our products or services as a customer, please contact us at [data-protection-officer@infobip.com](mailto:data-protection-officer@infobip.com).

## 13. 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. You can always check the date of the last update at the beginning of this Privacy Notice.



Previous version is available [HERE](#).

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