

## PRIVACY POLICY

### SCOPE

This privacy policy document applies generally to personal data received by the Atwix company in any format. Atwix will ensure all global data handled by Atwix conforms to this Privacy Policy.

Personal Data is information that can directly or indirectly identify a living individual.

Atwix servers, physical offices and employees are referred to as "Atwix" for the purposes of this document if not stated otherwise.

The keywords "must", "must not", "required", "shall", "shall not", "should", "should not", "recommended", "may", and "optional" in this document are to be interpreted as described in "Best Current Practice – Key Words".

### Who we are?

Atwix is an eCommerce agency, which provides a full cycle of eCommerce solutions development and consulting services. Therefore, Atwix always has to deal with its clients' data of any sort.

### What data do we collect?

According to our operations' specific, Atwix deals with personal data of different kind:

- **Atwix.com visitors** – we are gathering data for better understanding of our website visitors: pages they visited, mobile device screen resolution, anonymized IP and geodata. More details can be found at our website.
- **Personal information of our employees and employee candidates** – this information is gathered for employment purposes and respectful working relationships that fall beyond the subject of this document. Every Atwix employee candidate signs Non-Disclosure Agreement (NDA) and every employee signs both NDA and working contract. These documents prohibit any client's data sharing and disclosure according to high confidentiality and security standards. Atwix employees must not share any client's or client's customer data or use it in any manner other than required for providing services.
- **Client's data** – only Atwix employees that have a direct contact with Atwix clients have access to client-related information. This includes only data that is necessary for productive communication and providing services. It may include the client's name, phone number, email, any other web communicator identifier. Such information must not be shared or used in any other way than necessary for ensuring proper communication during business relations. Client billing information, such as billing address, phone number, fax etc. is available only for the operations department and is processed only in terms of fulfilling financial obligations between the client and Atwix company.

- **Client's customer data** – as Atwix clients are mostly web stores, these stores usually contain customer information. This information is part of Atwix client business infrastructure and is being processed according to this particular client privacy policy. Atwix is not responsible for any customer data misuse, conducted from the client side. No Atwix employee with respective access must share or process such data in any way except the one required for assisting with a certain business issue, related to a specific *customer* within services provided to the *client*. Atwix does not copy, store, share or process any customer information at Atwix servers and internal resources. All the customer information gets anonymized before reaching Atwix servers and internal resources.

### **Personal information processing.**

Atwix processes personal information based on the “Principle of The Least Privilege”. This means that only people that are required to get the access to the information will actually get it.

The personal information is being accessed and processed according to its type (see “What data do we collect?”).

Any personal data that is stored at Atwix servers or processed through Atwix work stations is covered with thorough security policies and best protection measures, making sure that no data is misused or leaked.

### **How long do we store personal data?**

We will keep your personal data for no longer than reasonably necessary for our ongoing business relationship, for the record keeping purposes and in case of any legal claims or complaints.

### **Selling personal information.**

We do not sell your personal information.

### **Your rights.**

Depending on the geographical region in which you live, you may have certain rights with respect to your Personal Information, including the rights to:

- Know what kind of your Personal Information we have collected;
- Obtain a copy of your Personal Information in a usable format that can be transferred to another data controller;
- Know more about how we process your Personal Information;
- Fix inaccurate or incomplete Personal Information;
- Have your Personal Information removed or deleted;
- Restrict us in processing your Personal Information;
- Transfer your Personal Information to another data controller;

- Object to our processing and use of your Personal Information;
- Not to be discriminated by your legal rights;
- Withdraw your consent at any time (to the extent that our data processing is consent-based), without affecting the lawfulness of such processing before its withdrawal;
- Lodge a complaint with a supervisory authority.

To exercise your rights, please contact us by using the information in the “Contact us” section, below. We try to respond to all legitimate, verifiable requests at our earliest convenience and will contact you for additional information if needed.

#### Contact us

If you have any questions about our privacy policy please contact us at [hello@atwix.com](mailto:hello@atwix.com), phone us +1 (833) GO-ATWIX or write us:

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