

# Fleksy by Thingthing Ltd. Privacy Policy

Owner and Data Controller

Thingthing Ltd.

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## What this policy covers

Your privacy is important to us, and so is being transparent about how we collect, use, and share information about you. This policy is intended to help you understand:

- What information we collect about you
- How we use information we collect
- How we share information we collect
- How we store and secure information we collect
- How to access and control your information
- How we transfer information we collect internationally

## Other important privacy information

This Privacy Policy covers the information we collect about you when you use our products or services, or otherwise interact with us (for example, by attending events), unless a different policy is displayed. "Thingthing", we and us refers to Thingthing LTD, Thingthing SL and any of our corporate affiliates. We offer software keyboard (Fleksy) for iOS and Android and we refer to all of these products, together with our other services and websites as "Services" in this policy.

This policy also explains how we use information about you. Your choices include how you can object to certain uses of information about you and how you can access and update certain information about you. If you do not agree with this policy, do not access or use our Services or interact with any other aspect of our business.

## What information we collect about you

We collect information about you when you provide it to us, when you use our Services, and when other sources provide it to us, as further described below.

### Information you provide to us

We collect information about you when you input it into the Services or otherwise provide it directly to us.

### Content you provide through our products:

**We don't collect, transmit or store in our infrastructure** the text you write using our Keyboard except your personal dictionary when you sync your data using the Cloud Sync feature (Android). In that specific case, your personal dictionary (excluding any identifiable, credit card, passwords or any sensitive data) is sent to an isolated storage in Amazon Web Services servers located in the European Union and it will be only accessible by you.. **We don't collect, transmit or store in our infrastructure** any other sensitive personal data stored in your phone like pictures or contacts. **All your sensitive personal data accessed by our Services installed in your device remains in your device with the exception of using Fleksy Sync which is completely optional to use.**

#### **Content you provide through our websites:**

The Services also include our websites owned or operated by us. We collect other content that you submit to these websites, which include social media or social networking websites operated by us. For example, you provide content to us when you provide feedback or when you participate in any interactive features, surveys, contests, promotions, sweepstakes, activities or events.

#### **Information you provide through our support channels:**

The Services also include our customer support, where you may choose to submit information regarding a problem you are experiencing with a Service. Whether you designate yourself as a technical contact, open a support ticket, speak to one of our representatives directly or otherwise engage with our support team, you will be asked to provide contact information, a summary of the problem you are experiencing, and any other documentation, screenshots or information that would be helpful in resolving the issue.

#### **Information we collect automatically when you use the Services**

We collect information about you when you use our Services, including browsing our websites and taking certain actions within the Services.

#### **Your use of the Services:**

We keep track of certain information about you when you visit and interact with any of our Services. The information we collect is about how you interact with and use features in the Services, in addition to content-related information described in "Content you provide through our products" above. You can disable our collection of this information from the Services contacting us and from our product settings.

#### **Device and Connection Information:**

We collect information about your computer, phone, tablet, or other devices you use to access the Services. This device information includes your connection type and settings when you install, access, update, or use our Services. We also collect information through your device about your operating system, IP address and crash data. We use your IP address and/or country preference in order to approximate your location to provide you with a better Service experience. How much

of this information we collect depends on the type and settings of the device you use to access the Services. You can disable our collection of this information from the Services via our product settings.

**Cookies and Other Tracking Technologies:**

Thingthing and our third-party partners, such as our advertising and analytics partners, use cookies and other tracking technologies (e.g., web beacons, device identifiers and pixels) to provide functionality and to recognize you across different Services and devices. For more information, please see our "Cookies and Tracking Notice", which includes information on how to control or opt out of these cookies and tracking technologies.

**Information we receive from other sources**

We receive information about you from other Service users, from third-party services, from our related companies, and from our business and channel partners.

**Other services you link to your account:** We receive information about you when you integrate or link a third-party service with our Services. For example, if you create an account or log into the Services using your Google credentials, we receive your name and email address as permitted by your Google profile settings in order to authenticate you. You may also integrate our Services with other services you use, such as to allow you to access, store, share and edit certain content from a third-party through our Services. For example, you may authorize our Services to access, display and store files from a third-party document-sharing service within the Services interface. Or you may authorize our Services to connect with a third-party calendaring service so that your meetings and connections are available to you through the Services. You may authorize our Services to sync a contact list or address book so that you can easily connect with those contacts within the Services or invite them to collaborate with you on our Services. The information we receive when you link or integrate our Services with a third-party service depends on the settings, permissions and privacy policy controlled by that third-party service. You should always check the privacy settings and notices in these third-party services to understand what data may be disclosed to us or shared with our Services.

**Thingthing Companies:** We receive information about you from companies that are owned or operated by Thingthing, in accordance with their terms and policies.

**Thingthing Partners:** We work with a global network of partners who provide consulting, implementation, training and other services around our products. Some of these partners also help us to market and promote our products, generate leads for us, and resell our products. We receive information from these partners, such as technical contact information, company name, what Thingthing products you have purchased or may be interested in, evaluation information you have provided, what events you have attended, and what country you are in.

**Other Partners:** We receive information about you and your activities on and off the Services from third-party partners, such as advertising and market research partners who provide us with information about your interest in and engagement with, our Services and online advertisements.

## How we use information we collect

How we use the information we collect depends in part on which Services you use, how you use them, and any preferences you have communicated to us. Below are the specific purposes for which we use the information we collect about you.

**To provide the Services and personalize your experience:** We use information about you to provide the Services to you, provide customer support, and operate and maintain the Services. Our Services also include tailored features that personalize your experience, enhance your productivity, and provide recommendations that are most relevant for you.

**For research and development:** We are always looking for ways to make our Services smarter, faster, secure, integrated, and useful to you. We use collective learnings about how people use our Services and feedback provided directly to us to troubleshoot and to identify trends, usage, activity patterns and areas for integration and improvement of the Services. In some cases, we apply these learnings across our Services to improve and develop similar features or to better integrate the services you use. We also test and analyze certain new features with some users before rolling the feature out to all users.

**To communicate with you about the Services:** We use your contact information to send transactional communications via email and within the Services, providing customer support, and sending you technical notices, updates, security alerts, and administrative messages. For example, certain actions you take in the Services may automatically trigger a feature or third-party app suggestion within the Services that would make that task easier. We also send you communications as you onboard to a particular Service to help you become more proficient in using that Service. These communications are part of the Services and in most cases you can opt out of them. If an opt out is available, you will find that option within the communication itself.

**To market, promote and drive engagement with the Services:** We use your contact information and information about how you use the Services to send promotional communications that may be of specific interest to you, including by email and by displaying Thingthing ads on other companies' websites and applications, as well as on platforms like Facebook and Google. These communications are aimed at driving engagement and maximizing what you get out of the Services, including information about new features, survey requests, newsletters, and events we think may be of interest to you. We also communicate with you about new product offers,

promotions and contests. You can control whether you receive these communications as described below under "Opt-out of communications".

**Customer support:** We use your information to resolve technical issues you encounter, to respond to your requests for assistance, to analyze crash information, and to repair and improve the Services.

**For safety and security:** We use information about you and your Service use to verify activity, to monitor suspicious or fraudulent activity and to identify violations of Service policies.

**To protect our legitimate business interests and legal rights:** Where required by law or where we believe it is necessary to protect our legal rights, interests and the interests of others, we use information about you in connection with legal claims, compliance, regulatory, and audit functions, and disclosures in connection with the acquisition, merger or sale of a business.

**With your consent:** We use information about you where you have given us consent to do so for a specific purpose not listed above. For example, we may publish testimonials or featured customer stories to promote the Services, with your permission.

#### **Legal bases for processing (for EEA users):**

If you are an individual in the European Economic Area (EEA), we collect and process information about you only where we have legal bases for doing so under applicable EU laws. The legal bases depend on the Services you use and how you use them. This means we collect and use your information only where:

- We need it to provide you the Services, including to operate the Services, provide customer support and personalized features and to protect the safety and security of the Services;
- It satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote the Services and to protect our legal rights and interests;
- You give us consent to do so for a specific purpose; or
- We need to process your data to comply with a legal obligation.

If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we or a third party have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using the Services.

## How we share information we collect

We make software keyboard, and we want them to work well for you. This means sharing information through the Services and with certain third parties. We share information we collect about you in the ways discussed below, including in connection with possible business transfers, but we are not in the business of selling information about you to advertisers or other third parties.

### Sharing with third parties

We share information with third parties that help us operate, provide, improve, integrate, customize, support and market our Services. The list of third parties is at the end of this document.

**Service Providers:** We work with third-party service providers to provide website and application development, hosting, maintenance, backup, storage, virtual infrastructure, analysis and other services for us, which may require them to access or use information about you. If a service provider needs to access information about you to perform services on our behalf, they do so under close instruction from us, including policies and procedures designed to protect your information.

**Third Party Apps:** You may choose to add new functionality or change the behavior of the Services by installing third party apps within the Services. Doing so may give third-party apps access to your account and information about you like your name and email address, and any content you choose to use in connection with those apps. Third-party app policies and procedures are not controlled by us, and this privacy policy does not cover how third-party apps use your information. We encourage you to review the privacy policies of third parties before connecting to or using their applications or services to learn more about their privacy and information handling practices. If you object to information about you being shared with these third parties, please uninstall the app.

**Links to Third Party Sites:** The Services may include links that direct you to other websites or services whose privacy practices may differ from ours. If you submit information to any of those third party sites, your information is governed by their privacy policies, not this one. We encourage you to carefully read the privacy policy of any website you visit.

**Social Media Widgets:** The Services may include links that direct you to other websites or services whose privacy practices may differ from ours. Your use of and any information you submit to any of those third-party sites is governed by their privacy policies, not this one.

**Third-Party Widgets:** Some of our Services contain widgets and social media features, such as the "Share in Twitter" feature. These widgets and features collect your IP address, which page you are visiting on the Services, and may set a cookie to enable the feature to function properly.

Widgets and social media features are either hosted by a third party or hosted directly on our Services. Your interactions with these features are governed by the privacy policy of the company providing it.

**With your consent:** We share information about you with third parties when you give us consent to do so. For example, we often display personal testimonials of satisfied customers on our public websites. With your consent, we may post your name alongside the testimonial.

**Compliance with Enforcement Requests and Applicable Laws; Enforcement of Our Rights:** In exceptional circumstances, we may share information about you with a third party if we believe that sharing is reasonably necessary to (a) comply with any applicable law, regulation, legal process or governmental request, including to meet national security requirements, (b) enforce our agreements, policies and terms of service, (c) protect the security or integrity of our products and services, (d) protect Thingthing, our customers or the public from harm or illegal activities, or (e) respond to an emergency which we believe in good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person. For more information on how we respond to government requests, see our Guidelines for Law Enforcement and our Transparency Report.

#### **Sharing with affiliated companies**

We share information we collect with affiliated companies and, in some cases, with prospective affiliates. Affiliated companies are companies owned or operated by us. The protections of this privacy policy apply to the information we share in these circumstances.

**Business Transfers:** We may share or transfer information we collect under this privacy policy in connection with any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company. You will be notified via email and/or a prominent notice on the Services if a transaction takes place, as well as any choices you may have regarding your information.

#### **How we store and secure information we collect**

##### **Information storage and security**

We use data hosting service providers in the European Union to host the information we collect, and we use technical measures to secure your data.

While we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that data, during transmission through the Internet or while stored on our systems or otherwise in our care, is absolutely safe from intrusion by others.

#### **How long we keep information**

How long we keep information we collect about you depends on the type of information, as described in further detail below. After such time, we will either delete or anonymize your information or, if this is not possible (for example, because the information has been stored in backup archives), then we will securely store your information and isolate it from any further use until deletion is possible.

**Marketing information:** If you have elected to receive marketing emails from us, we retain information about your marketing preferences for a reasonable period of time from the date you last expressed interest in our Services, such as when you last opened an email from us. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created.

## How to access and control your information

You have certain choices available to you when it comes to your information. Below is a summary of those choices, how to exercise them and any limitations.

### Your Choices:

You have the right to request a copy of your information, to object to our use of your information (including for marketing purposes), to request the deletion or restriction of your information, or to request your information in a structured, electronic format. Below, we describe the tools and processes for making these requests. You can exercise some of the choices by using settings available within the Products or your account. You may contact us as provided in the "Contact Us" section below to request assistance.

**Your request and choices may be limited in certain cases:** for example, if fulfilling your request would reveal information about another person, or if you ask to delete information which we are permitted by law or have compelling legitimate interests to keep. Where you have asked us to share data with third parties, for example, by installing third-party apps, you will need to contact those third-party service providers directly to have your information deleted or otherwise restricted. If you have unresolved concerns, you may have the right to complain to a data protection authority in the country where you live, where you work or where you feel your rights were infringed.

**Access and update your information:** Our Services and related documentation give you the ability to access and update certain information about you from within the Service. For example, you can access your personal dictionary from the settings of our product.

**Deactivate your account:** If you no longer wish to use our Services, please contact Thingthing support. Please be aware that deactivating your account does not delete your information. For more information on how to delete your information, see below.

**Delete your information:** Our Services give you the ability to delete certain information about you from within the Service. For example, you can remove all your personal dictionary from the settings of our product. Please note, however, that we may need to retain certain information for record keeping purposes or to comply with our legal obligations.

**Request that we stop using your information:** In some cases, you may ask us to stop accessing, storing, using and otherwise processing your information where you believe we don't have the appropriate rights to do so. For example, if you believe a Services account was created for you without your permission or you are no longer an active user, you can request that we delete your account as provided in this policy. Where you gave us consent to use your information for a limited purpose, you can contact us to withdraw that consent, but this will not affect any processing that has already taken place at the time. You can also opt-out of our use of your information for marketing purposes by contacting us, as provided below. When you make such requests, we may need time to investigate and facilitate your request. If there is delay or dispute as to whether we have the right to continue using your information, we will restrict any further use of your information until the request is honored or the dispute is resolved, provided your administrator does not object (where applicable). If you object to information about you being shared with a third-party app, please disable the app.

**Opt out of communications:**

You may opt out of receiving promotional communications from us by using the unsubscribe link within each email or by contacting us as provided below to have your contact information removed from our promotional email list or registration database.

**Turn off Cookie Controls:** Relevant browser-based cookie controls are described in our Cookies & Tracking Notice.

**Send "Do Not Track" Signals:** Some browsers have incorporated "Do Not Track" (DNT) features that can send a signal to the websites you visit indicating you do not wish to be tracked. Because there is not yet a common understanding of how to interpret the DNT signal, our Services do not currently respond to browser DNT signals. You can use the range of other tools we provide to control data collection and use, including the ability to opt out of receiving marketing from us as described above.

**Data portability:** Data portability is the ability to obtain some of your information in a format you can move from one service provider to another (for instance, when you transfer your personal

dictionary to another keyboard, taking into account that the destination keyboard should provide a way to import this information). Depending on the context, this applies to some of your information, but not to all of your information. Some information will be made available directly from keyboard settings as is the only way to access this type of information as it is not in our servers.

## How we transfer information we collect internationally

### International transfers of information we collect

We collect information globally and primarily store that information in the European Union. We transfer, process and store your information outside of your country of residence, to wherever we or our third-party service providers operate for the purpose of providing you the Services. Whenever we transfer your information, we take steps to protect it.

**International transfers to third parties:** Some of the third parties described in this privacy policy, which provide services to us under contract, are based in other countries that may not have equivalent privacy and data protection laws to the country in which you reside. When we share information of customers in the European Economic Area or Switzerland, we make use of the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks, European Commission-approved standard contractual data protection clauses, binding corporate rules for transfers to data processors, or other appropriate legal mechanisms to safeguard the transfer.

## Other important privacy information

### Our policy towards children

The Services are not directed to individuals under 16. We do not knowingly collect personal information from children under 16. If we become aware that a child under 16 has provided us with personal information, we will take steps to delete such information. If you become aware that a child has provided us with personal information, please contact our support services.

### Changes to our Privacy Policy

We may change this privacy policy from time to time. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice by adding a notice on the Services homepages or by sending you an email notification. We will also keep prior versions of this Privacy Policy in an archive for your review. We encourage you to review our privacy policy whenever you use the Services to stay informed about our information practices and the ways you can help protect your privacy.

If you disagree with any changes to this privacy policy, you will need to stop using the Services and deactivate your account(s), as outlined above.

## Contact Us

Your information is controlled by Thingthing LTD and Thingthing SL. If you have questions or concerns about how your information is handled, please direct your inquiry to Thingthing LTD, which we have appointed to be responsible for facilitating such inquiries:

ThingThing LTD  
3rd floor, 12 East Passage  
London, UK  
EC1A 7L  
E-Mail: [privacy@thingthing.co](mailto:privacy@thingthing.co)

## Cookies and Tracking Notice

Thingthing and our third party partners, such as our advertising and analytics partners, use various technologies to collect information, such as cookies, device trackers and web beacons.

### What types of technologies do we use?

We use cookies, web beacons and other technologies to improve and customize our products and websites ("the Services") and your experience; to allow you to understand usage of our Services and the interests of our customers; to determine whether an email has been opened and acted upon; and to present you with advertising relevant to your interests.

### How do we use them?

**Where strictly necessary.** These cookies and other technologies are essential in order to enable the Services to provide the feature you have requested.

**For functionality.** These cookies and similar technologies remember choices you make such as language or search parameters. We use these cookies to provide you with an experience more appropriate with your selections and to make your use of the Services more tailored. For performance and analytics. These cookies and similar technologies collect information on how users interact with the Services and enable us to improve how the Services operate. For example, we use Google Analytics cookies to help us understand how visitors arrive at and browse our products and website to identify areas for improvement such as navigation, user experience, and marketing campaigns.

**Targeting Cookies or Advertising Cookies.** These cookies collect information about your browsing habits in order to make advertising relevant to you and your interests. They remember the websites you have visited and that information is shared with other parties such as advertising technology service providers and advertisers.

**Social media cookies.** These cookies are used when you share information using a social media sharing button or "like" button on our websites or you link your account or engage with our content on or through a social media site. The social network will record that you have done this. This information may be linked to targeting/advertising activities.

### **How can you opt-out?**

To opt-out of our use of cookies, you can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from websites you visit. If you do not accept cookies, however, you may not be able to use all aspects of our Services. Thingthing and our third party partners also collect information using web beacons (also known as "tracking pixels") and device fingerprints.

Many browsers include their own management tools for removing HTML5 local storage objects. You may be able to opt out of receiving personalized advertisements as described in the Privacy Policy under "Your Choices."

You will not be able to opt-out of any cookies or other technologies that are "strictly necessary" for the Services.

## **Data processors**

**Amazon - Amazon Web Services (cloud storage services)**

<https://aws.amazon.com/compliance/gdpr-center/>

**Amplitude (product anonymous analytics)**

<https://amplitude.com/blog/2018/01/18/amplitudes-commitment-privacy-gdpr/>

**Branch (deep linking, referral programs)**

<https://branch.io/gdpr/>

**Google - Firebase (product anonymous analytics)**

<https://firebase.google.com/support/privacy/>

**Google - Cloud Platform (Play Services)**

<https://cloud.google.com/security/gdpr/>

**Google Analytics (Data anonymized analytics)**

<https://policies.google.com/privacy?hl=es>

**Google+**

[Google+](#)

**Fabric - Crashlytics (anonymous crash reporting tool)**

<https://docs.fabric.io/android/fabric/data-privacy.html>

**Facebook**

<https://www.facebook.com/fleksyapp/>

**Freshdesk (customer support)**

<https://www.freshworks.com/security/>

**MobileAction**

<https://www.mobileaction.co/privacy-policy>

**SendInBlue (email marketing)**

[SendInBlue](#)

**Twitter (social integration)**

<https://gdpr.twitter.com/>

**Typeform**

[Typeform](#)