

ANIA FocusNet Group Ltd

Privacy Policy

Introduction

This privacy policy applies to all services that ANIA FocusNet Group Ltd (www.focus-net.net) including "GotMsg" (www.gotmsg.com) and "SMSInstant" (www.smsinstant.com) that are owned and operated by ANIA FocusNet Group Ltd. We realize that you care how your information is processed and shared, and we appreciate your trust in us to do that carefully and sensibly. This document describes our Privacy Policy.

"Us", "we", "our", "ANIA FocusNet Group Ltd" and "FocusNet" mean the same.

"You", "Customer" and "user" mean the same.

"Service" may refer to any service that is provided by FocusNet.

"Website" may refer to any website that is mentioned above.

"Effective Date": 01/Apr/2018

Capitalized terms that are not expressly defined in this document shall have the meanings ascribed to them in the "Terms and Conditions of Use of ANIA FocusNet Group Ltd Services". Any personal information provided or acquired by us is controlled primarily by ANIA FocusNet Group Ltd.

FocusNet undertake to process the personal information of the customers, subscribers, website's users and persons who have subscribed to FocusNet's newsletter in accordance with the Cypriot data protection laws ["The Processing of Personal Data (Protection of Individuals) Law"] and the European General Data Protection Regulation 2016/679 (GDPR) – which replaces the Data Protection Directive 95/46/EC.

We believe it is important to you to know how we treat the information about you which we receive during your visits to the website. This Privacy Policy is designed to assist you in understanding how we collect, disclose, and safeguard the aggregate information we receive when you visit and browse the Website. We encourage you to take the time to read this Privacy Policy as well as those of any other sites you visit, whether through a link on that site or otherwise.

FocusNet undertake all commercially reasonable endeavors to keep all disclosed personal information secure. Information collected through tracking and registration will not be shared or sold to third parties for any purpose without your express consent, except as provided in this Privacy Policy, or in a contract between FocusNet and you.

When you visit the websites, we receive and may collect two types of information: (1) Website Use Information and cookies, and (2) personal information you knowingly choose to disclose, which is collected on individual basis.

When you click on links on the websites you may leave it. We are not responsible for the privacy practices of other sites, and we encourage you to read their privacy statements. If you have any questions or concerns about our Privacy Policy send us an email to support@focus-net.net.

Customer Data Processing

FocusNet collects personal information from users who visit the websites and register with our services. FocusNet is the data controller with respect to the customer's personal data. When the customer registers with our services, we may require: (i) username, (ii) password, (iii) email address, (iv) first and last name, (v) zip code, (vi) country and (vii) billing information such as billing address and (ix) tax id number. We may also ask customers to provide additional personal information such as (i) company name, (ii) title, (iii) education institution and (iv) other company and (v) personal details that the customer may opt out of by not entering data when asked.

We use the customers' registration information to authenticate users and provide access to the services. We also use the email addresses and telephone number used in the registration information to communicate with our customers. From time to time, FocusNet may contact you to notify you of changes to its services, scheduled maintenance, information about FocusNet and promotional material from FocusNet. The customer is obliged to update the data provided in the registration form as soon as any change in these data has occurred.

We will retain your information for as long as needed to provide you the services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Provision of personal data in connection with your use of the services is voluntary. Note, however, that the refusal to provide certain data may make it impossible for you to use all or part of any service functionalities.

Outsourcing of Subscribers Personal Data Processing

FocusNet recognizes the importance of respecting the privacy of subscribers who decided to entrust their sensitive information with you. We make every effort to safeguard their security. FocusNet will never use the information about the subscribers you collect within our services to send any information other than expressly provided by you, nor will we share it with or sell it to anyone else for such use.

Subscribers' personal data processing may be outsourced by the customer to FocusNet only where the customer is the data controller or where the latter processes such personal data. FocusNet may process subscribers' data within its capacity of data processor.

Subscribers' data processing may be outsourced as regards email address and other subscriber-related information considered by the customer necessary to ensure proper provision of the services. Further passing of the job of data processing may take place only within the limits, and for the purpose of proper provision, of the services.

As for the countries from outside of the European Economic Area, FocusNet shall cooperate only with entities from countries which ensure an adequate level of personal data protection. FocusNet declares that it provides security measures protecting the databases as defined by the law and meets the technical and organizational requirements by the law. FocusNet also ensures the implementation of legal notices in accordance with the relevant regulations.

Erasure of Processed Data

After removal of the customer's account from the service, FocusNet shall store information related to the customer and the subscriber, as well as any statistical data concerning the account for a period of no less than 90 days. The processing of personal data by FocusNet after the removal may only involve holding of the same, unless performance of other operations on the data has been imposed on FocusNet by applicable regulations or competent authorities.

FocusNet will store personal data in accordance with the clause above solely for the purposes of (i) possible reactivation of the account and (ii) performance of its duties as specified in the applicable regulations or as imposed by the competent authorities.

After the period mentioned above, the data will be permanently erased from the services and their recovery will not be feasible. Subscribers database may be returned to the customer at its request made within 7 days of the account's removal.

Sharing Information Regarding the Customers and Subscribers

FocusNet will not share, sell, rent or trade the customer's and subscriber's personal information other than as disclosed within this Privacy Policy. We reserve the right to disclose the customer's and subscriber's personal information as required by law and when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, Court order, or legal process served on FocusNet.

In certain situations, FocusNet may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

We use other third parties in a scope necessary to provide the services, such as a credit card processing company to bill the customer for goods and services. When you sign up for a service we will share your information as necessary for the third party to provide the services. These third parties are prohibited from using your personal information for promotional purposes.

If FocusNet is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a phone call of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

Passwords

FocusNet's customer account information, username, password and profile are password-protected so that you have secure access to entering and editing personal data. It is the customers' responsibility to protect the security of their passwords. Access to the services is protected by a unique username and password that is known to you only. FocusNet has designed internal security processes that encrypt customer's password to protect it from being divulged or accessed by anyone other than you. Neither FocusNet employees nor any of its contractors can obtain or access your password. Neither FocusNet employees nor any of its contractors will ask you for your password.

Website Use Information

Our servers automatically collect site use information, each time you visit any of our websites. The website use information includes, but is not limited to the following: the domain names, operating system in use (e.g. Macintosh, Windows), browser (e.g. Mozilla Firefox, Internet Explorer) and version, the website which referred you to us, and other similar information. This information may be aggregated to measure the number of visits, average time spent on the website, pages viewed, time and date of visits, and other similar information.

We may use and disclose site use information, for example, to measure the use of the website, improve the content, explain the utility of the website and services we provide, and to extend their functionality. As is true of most websites, we gather certain information automatically and store it in log files. This information includes browser type, referring/exit pages, operating system, date/time stamp, and clickstream data.

We use this information, which does not identify individual users, to analyze trends, to administer the website, to track users' movements around the website and to gather demographic information about our user base as a whole. We do not link this automatically-collected data to personal information. Similar to other commercial websites, the technology called "cookies" may be used to provide you with tailored information. A cookie is a small piece of data that a website can send to your browser, which may then be stored on your hard drive, so we can recognize you when you return. You may be able to set your browser to notify you when you receive a cookie. Our cookies collect general information that enhances our ability to serve you and measure the utility of the website. We do not link the information we store in cookies to any personal information you submit while on the website.

The use of cookies by third party web analytics partner is not covered by our Privacy Policy. We do not have access or control over these cookies. These third parties use session ID and persistent cookies to make it easier for you to navigate the website. Users can control the use of cookies at the individual browser level.

Information we collect may be used to enhance your use of the websites, and to provide you with the services, arrange the websites in the most customer friendly way, communicate special offers and featured items, and/or respond to your questions and suggestions.

In the case of an agreement, personal information includes data that identifies you as the specific individual, i.e. your name, email address, phone number, geographical address, and/or company name and company address. This information is used to complete the account application process, Customer's information request, and/or to verify the validity of the request, and to process payment. We will use this information solely for processing payments for the Service that you ordered.

FocusNet collects only personal information that you choose to provide voluntarily registering to our services. FocusNet shall advise you which information is mandatory to provide and what you do not have to enclose.

Mailing Policy

When you send us an email, we use your email address to thank you for your comment and/or reply to your question, and we will store your communication and our reply for any future correspondence. Beyond our initial reply, we will never use your email address to send you any unsolicited message or information, nor will we share it with or sell it to anyone else for such use.

When you accept to receive information about our services, promotions, newsletters, press releases, and/or new offers, we use your email address and any other information you give us to provide you with the information or other services, until you ask us to stop (using the unsubscribe instructions provided with each email communication).

When you request information or other services from us, we use your email address and any other information you give us to provide you with the information or other services that you requested, until you ask us to stop (using the unsubscribe instructions provided with each email, and/or on the site where you signed up, and/or as we otherwise provide), or until the information or service is no longer available.

We will never use your email address or other information to provide you with any unsolicited messages or information (unless that is part of the service you are requesting), nor will we share it with or sell, rent or lease it to any third party for such use.

Information Security

We believe that keeping personal information secure is one of our most significant responsibilities. We restrict access to personal information about you to those employees and others who need to know that information to assist us in our business, or to provide products or services to you. We safeguard personal information, according to the established security standards and procedures, by maintaining physical, electronic, and procedural safeguards to the personal data information.

When we request customers to enter sensitive information, such as credit card number, it is encrypted and protected with the best encryption software in the industry SSL and processed through a reputable payment processor. While on the secure page, such as our order form, the lock icon at the bottom of web browsers, e.g. Mozilla Firefox or Microsoft Internet Explorer, becomes locked, as opposed to unlocked or open, when you are just 'surfing'.

All of our customers' information, not just the sensitive information mentioned above, is restricted in our offices. Only employees who need the information to perform a specific job (e.g. our billing clerk or a customer service representative) are personally granted access to sensitive information.

Security

FocusNet stores its servers in a highly secure server environment, with surveillance and support to prevent unauthorized access and data security. We cannot guarantee the security of your data while it is being transmitted over the Internet and through servers that are out of our control. We strive to protect your personal information but FocusNet cannot ensure or warrant the security of any information you transmit to a website or services. Any data transmissions you make over the Internet are done so at your own risk. Once we receive the data transmission, we make our best efforts to ensure its security and privacy on our systems.

Use of Customer Information

We may use information from our customer's profile in our customer portfolio and/or in our company's presentation which may contain personal information (e.g. company name). We do obtain the customer's consent via email prior to using this information. If you wish to be removed, you can send us an email to support@focus-net.net.

Other Terms

We may change this Privacy Policy at any time. Unless stated otherwise, our current Privacy Policy applies to all information that we have about you and your account. If we make changes to this Privacy Policy we will notify you by publication here and/or via email prior to the changes taking effect.

If, however, we make material changes or FocusNet is going to use users' personal information in a manner different from that stated at the time of collection we will notify users via our websites prior to the change becoming effective. Users will have a choice as to whether or not we use their information in this different manner. However, if users have opted out of all communication with the website, or deleted their account, then they will not be contacted, nor will their personal information be used in this new manner.

Information posted by users in online blogs, public forums, online bulletin boards, social media etc. may be displayed on the website.