

Bluespacelabs Private Limited Privacy Notice

Last Updated: August 24, 2021

Thank you for your interest in BLUE SPACE LABS Private Limited. This Privacy Notice describes how BLUE SPACE LABS Private Limited. (Together with its subsidiaries, "Bluespacelabs," "Bluwyre," "we," "us," or "our"), collects, uses, discloses, and stores your information.

This Privacy Notice applies to information obtained through www.bluespacelabs.com (the "Websites"), and our service offerings, including our application ("Bluwyre"), and other websites and services where this Privacy Notice is shown (collectively, the "Services").

Please refer to the Analytics and Third Parties page for a current list of third-parties leveraged by us in delivering the Services.

Third parties who promote and market Bluespacelabs branded or white-labeled instances of the Bluespacelabs are referred to in this Privacy Notice as "Syndication Partners." Bluespacelabs allows independent software and application vendors (each, a "Developer") to make certain features of their applications, or other products or services owned and operated by the Developer (each, a "Developer Application") available through the Bluespacelabs. This Privacy Notice does not cover the collection, use, and disclosure of your information by Syndication Partners or Developers. These entities have their own privacy policies describing their practices that we encourage you to read.

1. The Information We Collect
2. How We Use Your Information
3. Legal Bases For Processing Personal Information (For EEA Visitors)
4. Online Analytics And Advertising
5. How We Share Your Information
6. Information We Process On Behalf Of Our Customers (As Data Processors)
7. Third Party Links And Features
8. Security
9. Data Retention
10. Children's Privacy
11. Your Choices And Rights
12. Information For International Users
13. Changes And Updates To This Privacy Notice
14. Contact Information

1. The Information We Collect

We collect information in multiple ways, including:

Information you provide. We collect any information that you provide us when you use the Services, including:

- *Registration and Profile Information.* If you register for one of our Services, we will ask you to provide your name, email address, and title. You may optionally provide additional profile information such as your phone number, date of birth, IM screen name, Twitter handle, and professional experience. You may also submit content including text, images, and other media files ("User Submissions"), such as when you submit a comment regarding a Developer Application.

- *Communications and Other Interactions.* We may collect information you provide if you interact with other users through the Services. We may also collect information through your communications with our sales or customer-support team.
- *Payments.* If you make payments through the Services, we will ask you to provide your payment information, such as your credit card number, so our service providers can process your payments.

Information we collect through automated means. We and our service providers (which are third party companies that work on our behalf) may use a variety of technologies, including cookies and similar tools, to assist in collecting certain technical information from your computer or mobile device.

- *Device and Usage Information.* When you use the Services or open one of our HTML emails, we may automatically record certain information from your web browser by using different types of technology, including standard log files, "clear gifs" or "web beacons." This automatically collected information may include Internet Protocol address ("IP Address") or other device address or ID, web browser and/or device type, the web pages or sites that you visit just before or just after you visit the Services, the pages you view on the Services, and the dates and times that you visit the Services.
- *Cookies:* When you use the Services, we may send one or more cookies – small text files containing a string of alphanumeric characters – to your computer. Cookies help us to operate and improve our services, customize your experience and preferences, allow you to access and use our services without re-entering your email and password and to understand which areas and features of our services are most popular and count visits. We may use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits. Persistent cookies can be removed. Please review your web browser "Help" file to learn the proper way to modify your cookie settings.

Please note that if you delete, or choose not to accept, cookies from the Services, you may not be able to utilize the features of the Services to their fullest potential. Additionally, as we adopt additional technologies, we may also gather information through other methods.

Syndicated Partners may send cookies to your computer in order to track your online activities on the Services. We are not responsible for the practices and policies of Syndicated Partners and encourage you to learn more about a Syndicated Partner's privacy and security policies.

- *Analytics Information.* We use website and application analytics services provided by internal and third parties that use cookies and other similar technologies to collect information about the use of our Services and to report trends, without identifying individual visitors. The third parties that provide us with these services may also collect information about your use of third-party websites.

Information We Collect From Others. We may also obtain information from third parties and sources other than the Services, such as advertisers, Syndication Partners, Developers, or reseller partners, that we combine with information collected through the Services. We do so only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us. The types of information we collect from third parties include company roles and system identification numbers and we use the information we receive from these third parties to the extent necessary to provide the Services or maintain and/or improve the accuracy of the records we hold about you.

2. How We Use Your Information

We, or our service providers, use your information (including any information that we collect, as described in this Privacy Notice) for various business and operational purposes depending on the types of information we have collected from and about you and the specific Service you use, in order to:

- Complete a purchase or provide the Services you have requested, including invoicing and accounting
- Respond to your request for information and provide you with more effective and efficient customer service
- Provide you with updates and information about products you have purchased from us
- Contact you by email, postal mail, or phone regarding Bluespacelabs and third-party products, services, surveys, research studies, promotions, special events and other subjects that we think may be of interest to you
- Customize the advertising and content on the Services
- Help us better understand your interests and needs, and improve the Services
- Engage in analysis, research, and reports regarding use of our Services
- Synthesize and derive insights from your use of different Services
- Provide, manage, and improve the Services and their performance, and test and create new products, features, and services
- Secure our websites, products, software, or applications
- Understand and resolve app crashes and other issues being reported
- Comply with any procedures, laws, and regulations which apply to us where it is necessary for our legitimate interests or the legitimate interests of others
- Establish, exercise, or defend our legal rights where it is necessary for our legitimate interests or the legitimate interests of others
- Protect the safety and/or integrity of our users, employees, third parties, members of the public, and/or our Services
- Prevent fraud

Combined Information. For the purposes discussed in this Privacy Notice, we may combine the information that we collect through the Services with information that we receive from other sources, both online and offline, and use such combined information in accordance with this Privacy Notice.

Aggregate/Anonymous Data. We may aggregate and/or anonymize any information collected through the Services so that such information can no longer be linked to you or your device ("Aggregate/Anonymous Information"). We may use Aggregate/Anonymous Information for any purpose, including without limitation for research and marketing purposes, and may also share such data with any third parties, including advertisers, promotional partners, and sponsors.

3. Legal Bases For Processing Personal Information (For EEA Visitors)

If you are a resident from the European Economic Area, our legal bases for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it. Generally, the legal bases are as follows:

- Where use of your information is necessary to perform our obligations under a contract with you (for example, to comply with: the terms of service of our websites which you accept by browsing the websites/registering; and/or our contract to provide our Services to you).
- Where use of your information is necessary for our legitimate interests or the legitimate interests of others (for example, to provide security for our websites, products, software, or applications; operate our business and our Services; ensure safe environments for our staff and visitors; make and receive payments; comply with legal requirements and defend our legal rights; prevent fraud and to know the customer to whom we are providing Services).
- Where we have your consent, in accordance with applicable legal requirements, to use your information for a particular purpose.
- Where we use your information to comply with applicable legal obligations (for example, keeping track of purchases for tax and auditing purposes).

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the “Contact Information” section below.

4. Online Analytics And Advertising

Analytics. We may use third-party web and mobile application analytics services (such as those of Google Analytics) on our Services to collect and analyze usage information through cookies and similar tools; engage in auditing, research, or reporting; assist with fraud prevention; and provide certain features to you. To prevent Google Analytics from using your information for analytics, you may [install the Google Analytics Opt-out Browser Add-on](#).

Online Advertising. The Services may integrate third-party advertising technologies that allow for the delivery of relevant content and advertising on the Services, as well as on other websites you visit and other applications you use. These third parties may place their own cookies, pixel tags and similar technologies to collect information about your use of the Services. We also allow third parties (e.g., ad networks and ad servers, such as Google Analytics, DoubleClick and others) to access their own cookies and tracking technologies on your computer, mobile phone, or other device you use to access the Services. These third parties may use this and other information they have collected about you to deliver targeted advertisements for products and services in which you might be interested.

We neither have access to, nor does this Privacy Notice govern, the use of cookies or other tracking technologies that may be placed on your device you use to access the Services by such non-affiliated third parties.

Please note that even if you choose to remove your information (opt-out), you will still see advertisements. Additionally, many network advertising programs allow you to view and manage the interest categories they have compiled from your online browsing activities. These interest categories help determine the types of targeted advertisements you may receive marketing messages. We may use information we collect for marketing purposes, such as providing you with promotional materials that may be useful, relevant, valuable or otherwise of interest to you, in accordance with your marketing preferences. Where required under applicable law, we will obtain your prior opt-in consent to send you electronic marketing communications. You will have the ability to opt-out of receiving any such communications, either through unsubscribe links provided in the messages, by updating your account preferences, or by contacting us using the contact details provided under the "Contact Information" section below.

Notice Concerning Do Not Track. Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. We are committed to providing you with meaningful choices about the information collected on our website for third party purposes. However, we do not currently recognize or respond to browser initiated DNT signals.

5. How We Share Your Information

We may share your information in a variety of circumstances in connection with the operation of our business:

- **Syndication Partners and Developers.** Bluespacelabs discloses the information you provide or that we collect to Developers and Syndication Partners in connection with the interoperation of their service offerings with the Services in order for them to provide their services to you. Bluespacelabs may provide Developers, applicable Syndication Partners, and your subscribing organization with information regarding your use of the Services.
- **Joint Marketing Partners.** If you choose to participate in a webinar that is provided jointly by Bluespacelabs and one of our partners, the information you provide in connection with such webinar will be collected by both Bluespacelabs and the partners jointly providing the webinar, and such partners may use the information collected in accordance with their privacy policies and terms, including to contact you, in accordance with applicable legal requirements.
- **Vendors and Service Providers.** Bluespacelabs works with third party service providers who provide website development, hosting, maintenance, and support as well as other business services for us. To the extent it is necessary for these service providers to provide the services, these third parties may have access to or process your information.
- **Other Users.** The Services allow users to communicate in a variety of ways. Any information that you voluntarily choose to include in an area on the Services that is accessible to another user, such as a public profile page or in a review, comment, posting, electronic message, or other User Submission, will be available to other users who have access to that content. Once you make your information available to others in any of these ways, it may be collected, used, and disclosed by the recipients without restriction.
- **Aggregate/Anonymous Information.** Bluespacelabs may disclose Aggregate/Anonymous Information with interested third parties, to assist such parties in understanding the usage, viewing, and demographic patterns for certain programs, content, services, advertisements, promotions, and/or functionality on the Services.
- **Third Party Applications.** We may enable you to share information from the Services to third party applications. We are not responsible for how you share this information through these or similar services. These third parties may use or share your information in accordance with their own privacy policies. We strongly suggest you review the third parties’ privacy policies if you use the relevant features.
- **Affiliates and Subsidiaries.** We may share information with affiliates and subsidiaries.
- **As Required by Law and Similar Disclosures.** We may disclose information about you: (i) if we are required to do so by law, regulation, or legal process, such as a court order or subpoena; (ii) in response to requests by government agencies, such as law enforcement authorities; (iii) when we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Bluespacelabs, our users and partners, or the public; and (iv) to enforce our agreements, policies, and Terms of Service.

- Merger, Sale, or Other Asset Transfers. We reserve the right to transfer your information to service providers, advisors, potential transactional partners, or other third parties in connection with the consideration, negotiation, or completion of a corporate transaction in which we are acquired by or merged with another company or we sell, liquidate, or transfer all or a portion of our assets.
- Consent. We may also disclose your information to any third parties based on your permission to do so.

6. Information We Process On Behalf Of Our Customers (As Data Processors)

Our customers may choose to use the Services to process some of their data, which may contain personal information. The data that we process through our Services for our customers is processed by us purely as a data processor, on behalf of our customers, and in accordance with our customers' instructions, and our privacy practices governing the processing of such data will be in accordance with contracts that we may have in place with our customers.

If you have any questions or concerns about how such data is handled or would like to exercise your rights as a data subject, you should contact the person or entity who has contracted with us to use the Services to process your data (i.e., the data controller). Our customers control the personal information in these cases and determine the details regarding their account, including without limitation, how and for what purpose the data collected on their behalf should be processed. We will, however, aid our customers to address any concerns you may have, in accordance with the terms of our contract with them.

7. Third Party Links And Features

The Services contain links to and integrate with websites and services provided by third parties, including without limitation Developers and Syndication Partners (where applicable). Any information you provide on third party sites or services is provided directly to that third party and is subject to that third party's policies, if any, governing privacy and security. We are not responsible for the content or privacy and security practices and policies of third party sites or services to which links are displayed on the Services. We encourage you to learn about third parties' privacy and security policies before providing them with your information.

8. Security

Bluespacelabs utilizes a combination of physical, technical, and organizational security measures to protect your information against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure, or access. Please note that no data transmission over the Internet or method of electronic storage can be guaranteed to be 100% secure. We cannot ensure or warrant the security of any information you transmit to Bluespacelabs, and you do so at your own risk. Once we receive your transmission of information, Bluespacelabs endeavors to secure our systems, but please note that this is not a guarantee that such information may not be accessed, disclosed, altered, or destroyed by system malfunction or circumvention of our safeguards.

Where we have given you (or where you have chosen) a password which enables you to access to our Services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

9. Data Retention

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements). The length of time for which we retain information depends on the purposes for which we collected and use it and/or as required to comply with applicable laws.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

10. Children's Privacy

The Services are intended for general audiences and not for children under the age of 13. If we become aware that we have collected "personal information" (as defined by the United States Children's Online Privacy Protection Act) from children under the age of 13 without legally-valid parental consent, we will take reasonable steps to delete it as soon as possible. We do not knowingly process data of EU residents under the age of 16 without parental consent. If we become aware that we have collected data from an EU resident under the age of 16 without parental consent, we will take reasonable steps to delete it as soon as possible. We also comply with other age restrictions and requirements in accordance with applicable local laws.

11. Your Choices And Rights

We respect your right to make choices about the ways we collect, use, and disclose your information.

Your legal rights. Depending on the laws of your local jurisdiction, you may have certain rights and choices with respect to your information. For example, under local laws, you may be able to ask us to:

- provide access to and/or a copy of certain information we hold about you
- prevent the processing of your information for direct-marketing purposes (including any direct marketing processing based on profiling)
- update or rectify information which is out of date or incorrect
- delete certain information which we are holding about you
- oppose, cancel, or restrict the way that we process and disclose certain of your information
- transfer your information to a third-party provider of services
- revoke your consent for the processing of your information

We will consider all requests and provide our response within the time period stated by applicable law. Please note, however, that certain information may be exempt from such requests in some circumstances, which may include if we need to keep processing your information for our legitimate interests or to comply with a legal obligation. We may request you provide us with information necessary to verify your identity before responding to your request as required or permitted by applicable law.

You have the right to complain to a data protection authority about our collection and use of your personal information. Alternatively, you may seek a remedy through local courts if you believe your rights have been breached.

Marketing. You may instruct us not to use your contact information to contact you by email, postal mail, or phone regarding products, services, and promotions that might appeal to your interests through unsubscribe links provided in the messages, by updating your account preferences, or by contacting us using the contact details provided under the "Contact Information" section below.

Please note that, regardless of your request, we may still use and share certain information as permitted by this Notice or as required by applicable law. For example, you may not opt out of certain operational emails, such as those reflecting our relationship or transactions with you.

13. Information For International Users

Please note that in providing services to you, we may subcontract the processing of your data to, or otherwise share your information with, other members within the Bluespacelabs group, trusted service providers, and trusted business partners in countries other than the country in which the information was originally collected, including the United States of America. *Such third parties may be engaged in, among other things, the provision of the Services to you, the processing of transactions and/or the provision of support services.*

Where required, we will use appropriate safeguards for transferring data outside of the EEA. This includes signing Standard Contractual Clauses that govern the transfers of such data, which may be used in conjunction with additional safeguards. For more information about these safeguards, please contact us as set forth below.

14. Changes And Updates To This Privacy Notice

Please revisit this page periodically to stay aware of any changes to this Privacy Notice, which may be revised from time to time at Bluespacelabs sole discretion. If we modify the Privacy Notice, we will make it available through the Services, and indicate the date of the latest revision. In the event that the modifications materially alter your rights or obligations hereunder, we will notify you as may be required by law.

Our amended Privacy Notice will automatically take effect 30 days after it is made available through the Services, except that (i) we will not, without your consent, use your previously collected personal information in a manner inconsistent with the Privacy Notice in effect when we received that information, and (ii) if you do not agree with any changes to the Privacy Notice, you may terminate your account ceasing use of the Services.

15. Contact Information

If you have any questions, concerns or complaints regarding the use or disclosure of your information or if you would like to review, delete or update information we have about you or your preferences, you can contact us either by mail or email: info@bluespacelabs.com

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