

Privacy Policy

Effective date: November 1, 2021

We at Peki know you care about how your personal information is used and shared, and we take your privacy seriously. Please read the following to learn more about our Privacy Policy. **By using or accessing the Services in any manner, you acknowledge that you accept the practices and policies outlined in this Privacy Policy, and you hereby consent that we will collect, use, and share your information in the following ways.**

Remember that your use of Peki's Services is at all times subject to the [Terms of Use](#), which incorporates this Privacy Policy. Any terms we use in this Policy without defining them have the definitions given to them in the [Terms of Use](#).

What Does This Privacy Policy Cover ?

This Privacy Policy covers our treatment of personally identifiable information ("Personal Information") that we gather when you are accessing or using our Services, but not to the practices of companies we don't own or control, or people that we don't manage.

Personal Data of Children

We do not knowingly collect or solicit personal information from anyone under the age of 13. If you are under 13, please do not attempt to register for the Services or send any personal information about yourself to us. If we learn that we have collected personal information from a child under age 13, we will delete that information as quickly as possible. If you believe that a child under 13 may have provided us personal information, please contact us at hey@Peki.io.

What Information Does Peki Collect and How?

What personal information we collect and how we use it depends largely on the interaction that takes place between you and Peki, most of which can be categorized under the following:

Information You Provide to Us:

We receive and store any information you knowingly provide to us. For example, if you create an account on our Services to build a chatbot, through the registration process and/or through your account settings, we may collect Personal Information such as, but not limited to, your name, email address, timezone, list of Facebook Pages you own.

Or, if you are an individual who communicates with chatbots that have been created using our services, we may collect information such as, but not limited to, your name, gender, time zone, and avatar/picture. If you provide your Facebook or other third-party account credentials to, you understand some content and/or information in those accounts ("Third Party Account Information") may be transmitted into your account with us, and that Third Party Account Information transmitted to our Services is covered by this Privacy Policy; for example, when you log in to our Services using your Facebook Messenger account, we may receive your personal information associated with that account, such as your Facebook pages. Certain information may be required to register with us or to take advantage of some of our features.

Information Collected Automatically

Whenever you interact with our Services, we automatically receive and record information on our

server logs from your browser or device, which may include any chatbots you have created using the Services, your conversation history with the chatbots(s), IP address, geolocation data, device identification, “cookie” information, the type of browser and/or device you’re using to access our Services, and the page or feature you requested. “Cookies” are identifiers we transfer to your browser or device that allow us to recognize your browser or device and tell us how and when pages and features in our Services are visited and by how many people. You may be able to change the preferences on your browser or device to prevent or limit your device’s acceptance of cookies, but this may prevent you from taking advantage of some of our features.

If you click on a link to a third party website or service, a third party may also transmit cookies to you. Again, this Privacy Policy does not cover the use of cookies by any third parties, and we aren’t responsible for their privacy policies and practices. Please be aware that cookies placed by third parties may continue to track your activities online even after you have left our Services, and those third parties may not honor “Do Not Track” requests you have set using your browser or device.

We may use this data to customize content for you that we think you might like, based on your usage patterns. We may also use it to improve the Services or to help developers build better chatbots— for example, this data can tell us how often users use a particular feature of the Services, or what kinds of questions users ask of certain chatbots, and we can use that knowledge to make the Services and the chatbots created through the Services interesting to as many users as possible.

Information Collected From Other Websites and Do Not Track Policy

Through cookies we place on your browser or device, we may collect information about your online activity after you leave our Services. Just like any other usage information we collect, this information allows us to improve the Services and customize your online experience, and otherwise as described in this Privacy Policy. Your browser may offer you a “Do Not Track” option, which allows you to signal to operators of websites and web applications and services (including behavioral advertising services) that you do not wish such operators to track certain of your online activities over time and across different websites. We honor Do Not Track signals from your browser.

What Is The Purpose Of Data Collection?

We gather various types of Personal Information from our users, as explained in more detail below, and we use this Personal Information internally in connection with our Services, including to personalize, provide, and improve our services, to allow you to set up a user account, to enable you to build chatbots and communicate with chatbots others have built, to contact you and allow other users to contact you, to fulfill your requests for certain products and services, and to analyze how you use the Services:

For service operations (i) To operate, maintain, administer and improve the Services; (ii) to manage and communicate with you regarding your Services account, if you have one, including by sending you Services announcements, technical notices, updates, security alerts, and support and administrative messages; (iii) to process payments you make through the Services; (iv) to better understand your needs and interests, and personalize your experience with the Services; (v) to send you information about the Services by email (vi) to respond to your Services-related requests, questions and feedback.

To communicate with you. If you request information from us, register for the Services or participate in our surveys, promotions or events, we may send you Peki-related marketing communications if permitted by law but will provide you with the ability to opt out.

Administration and analysis: We use automatically collected information to administer the Service and the Site and we analyze (and may engage third parties to analyze) this information to improve and enhance the Site and the Services by expanding their features and functionality and tailoring it to our Users' needs and preferences.

To analyze trends, administer the Site, track users' movements around the Site, serve targeted advertisements, and gather demographic information about our user base as a whole.

To comply with law. We use your personal information as we believe necessary or appropriate to comply with applicable laws, lawful requests and legal process, such as to respond to subpoenas or requests from government authorities.

With your consent. We may use or share your personal information with your consent, such as when you consent to let us post your testimonials or endorsements on our Site, you instruct us to take a specific action with respect to your personal information or you opt into third party marketing communications.

To create de-identified data for analytics. We may de-identify personal information. We de-identify personal information by excluding information that makes the data personally identifiable to you, and use that de-identified data for our lawful business purposes.

For compliance, fraud prevention and safety. We use your personal information as we believe necessary or appropriate to (a) enforce the terms and conditions that govern the Services; (b) protect our rights, privacy, safety or property, and/or that of you or others; and (c) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

To provide, support, and improve the Services we offer. This includes our use of the data that our Customers provide us in order to enable our Customers to use the Services to communicate with Subscribers. This also includes, for example, aggregating information from your use of the Services or visit to our Site and sharing this information with third parties to improve our Services. This might also include sharing your information or the information you provide us about your Subscribers with third parties in order to provide and support our Services or to make certain features of the Services available to you. When we do have to share personal information with third parties, we take steps to protect your information by requiring these third parties to enter into a contract with us that requires them to use the personal information we transfer to them for lawful business purposes in a manner that is consistent with this Privacy Policy.

Will Peki Ever Change This Privacy Policy?

We're constantly trying to improve our Services, so we may need to change this Privacy Policy from time to time as well, but we will alert you to changes by placing a notice on Peki.com, by sending you an email, and/or by some other means. Please note that if you've opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is used.

What Information Does Peki Processes In Connection With Third Party Services?

Depending on how you have configured our Services, you may be able to use several functionalities provided by third parties. Certain of these functions need further information or personal data processed by us or the third party. Please note that you as our customer remain solely responsible under applicable data protection law for the processing of personal data under such functionality to your user and we remain the processor of such data. The fulfilment of obligations under applicable data protection law to your users is thus solely your responsibility. We will provide information on any of our products and services in this regard in the following:

Transfer data with our Services to Google sheets : Our Services provide the functionality to send data to Google sheets provided by a messenger chatbot you have built with our Services. You can provide content to the Google sheets and share certain information, e.g., bot user's email address. If you want to use this function, the processing of certain data is mandatory to provide the functionality and will be done on your behalf only. For this purpose, we collect and process personal data, in particular, the Google ID or email address. In addition, we collect technical data, such as access tokens, refresh tokens or spreadsheet IDs. All information we collect is processed solely to provide the functionality as described above.

Except for bot admin's email address, which could possibly be shared with other admins to the extent necessary to provide this function, none of the processed data is being shared with third parties other than elsewhere stated in this privacy policy.

To comply with the data protection obligations, we recommend informing your users on the processing by adding the following wording to your privacy policy, without giving any warranty to be sufficient to comply with the legal obligations to which you are subject:

"We collect or process personal data by the use of third-party tools, inter alia, we use the services of 200 Labs, Inc. d/b/a Peki ("Peki"). Peki is an online platform that allows us to easily build, host and manage chatbots. We use certain functionalities that enable us to send data to Google sheets provided by a messenger chatbot we have built with Peki's services. Using this function, the processing of certain data by Peki and Google is mandatory to provide the functionality. For this purpose, we may collect and process personal data, such as email addresses. In addition, we collect technical data, such as access tokens, refresh tokens or spreadsheet IDs. All information we collect is processed solely to provide the functionality as described above. None of the processed data is being shared with third parties other than already stated in this privacy policy."

Will Peki Share Any of the Personal Information It Receives ?

We do not rent or sell your Personal Information in personally identifiable form to anyone. We may share your Personal Information with third parties as described in this section:

Information that's been de-identified. We may de-identify your Personal Information so that you are not identified as an individual, and provide that information to our partners. We may also provide aggregate usage information to our partners (or allow partners to collect that information from you), who may use such information to understand how often and in what ways people use our Services, so that they, too, can provide you with an optimal online experience. However, we never disclose aggregate usage or de-identified information to a partner (or allow a partner to collect such information) in a manner that would identify you as an individual person.

Chatbot Developers: The developers/owners of chatbots created through the Services which you communicate with will have access to the Personal Information you provide to them. For example, if you communicate with a chatbot which was created through the Services, the developer/ owner of that chatbot may have access to your conversation history with the chatbot, your username, your

avatar, and any other information you provide through the chatbot. In addition, the chatbot developer/owner may use a Salesforce or other third party product integration to receive and process the data from your interaction with the chatbot.

Affiliated Businesses: In certain situations, businesses or third party websites we're affiliated with may sell or provide products or services to you through or in connection with the Services (either alone or jointly with us). You can recognize when an affiliated business is associated with such a transaction or service, and we will share your Personal Information with that affiliated business only to the extent that it is related to such transaction or service. One such service may include the ability for you to automatically transmit Third Party Account Information, such as your Facebook Messenger profile information, to your Services profile or to automatically transmit information in your Services profile to your third party account. We have no control over the policies and practices of third party websites or businesses as to privacy or anything else, so if you choose to take part in any transaction or service relating to an affiliated website or business, please review all such business' or websites' policies.

Agents: We employ other companies and people to perform tasks on our behalf and need to share your information with them to provide products or services to you; for example, we may use a payment processing company to receive and process your credit card transactions for us. Unless we tell you differently, our agents do not have any right to use the Personal Information we share with them beyond what is necessary to assist us. Note that an "agent" may also be considered a "partner" in certain circumstances, and would be subject to the terms of the "**Information that's been de-identified**" section in that regard.

Professional Advisors: We may disclose your personal information to professional advisors, such as lawyers, auditors and where necessary in the course of the professional services that they render to us.

Business Transfers: We may choose to buy or sell assets, and may share and/or transfer customer information in connection with the evaluation of and entry into such transactions. Also, if we (or our assets) are acquired, or if we go out of business, enter bankruptcy, or go through some other change of control, Personal Information could be one of the assets transferred to or acquired by a third party.

Protection of Peki and Others: We reserve the right to access, read, preserve, and disclose any information that we believe is necessary to comply with law or court order; enforce or apply our [Terms of Use](#) and other agreements; or protect the rights, property, or safety of Peki, our employees, our users, or others.

Is Personal Information About Me Secure?

Your account is protected by a password for your privacy and security. If you access your account via Facebook or another third party site or service, you may have additional or different sign-on protections via that third party site or service. You must prevent unauthorized access to your account and Personal Information by selecting and protecting your password and/or other sign-on mechanism appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account.

We endeavor to protect the privacy of your account and other Personal Information we hold in our records, but unfortunately, we cannot guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

What Choices And Rights Do I Have?

You can always opt not to disclose information to us, but keep in mind some information may be needed to register with us, to communicate with chatbots, or to take advantage of some of our features.

You may stop using the Services at any time; however, your conversation logs from communications with chatbots may remain in our records.

You also have the following rights:

- Access your personal information that Peki collect.
- Peki users may review, update, correct or delete the personal information in their registration profile by logging into their account. Peki users may also contact us to accomplish the foregoing or if you have additional requests or questions.
- If you are a resident of the European Economic Area (“EEA”), you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information where it is technically possible.
- Similarly, if you are a resident of the EEA, if we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your personal information. We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Access to Data Controlled by our Customers. Peki has no direct relationship with the individuals whose personal information is contained within the Custom User Fields processed by our Service. An individual who seeks access, or who seeks to correct, amend, or delete personal information provided by our users should direct their request to the Customer directly.

Retention Of Information

We will only hold your information for as long as is necessary for the purposes set out in this privacy policy. We may also retain log files for analysis purposes – these log files are generally retained for a short period of time, except in cases where the information is used for website security, improving the website functionality, and in the cases in which we are legally obligated to retain information for longer time period. If required by law, we will delete personal information by erasing it from our database.

What If I Have Questions About This Policy?

If you have any questions or concerns regarding our privacy policies, please send us a detailed message to hey@Peki.io, and we will try to resolve your concerns.