



Privacy Policy

DP.Privacy Policy.4.0

Identification

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Disclaimer

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1. Definitions

doDOC - doDOC Corp. or any of its subsidiaries

Customer Tenant - Software instance for users from the same client

Customer Data - Messages, files or other content submitted through Services accounts

Customer - The organization (e.g., your employer or another entity or person)

2. Objective

This Privacy Policy describes how doDOC collects, uses and discloses information, and what choices you have with respect to your information.

When we refer to “doDOC”, we mean the doDOC entity that acts as the controller or processor of your information.

3. Scope

This Privacy Policy applies to information collected when you use or access doDOC online websites (such as www.dodoc.com), products, services, or applications (collectively, the "doDOC Services"), and other interactions (e.g., customer service inquiries, conferences, etc.) you may have with doDOC. If you do not agree with the terms, do not access or use the Services, Websites, or any other aspect of doDOC's business.

A separate agreement governs delivery, access and use of the Services (the “Customer Agreement”), including the processing of any messages, files or other content submitted through Services accounts (collectively, “Customer Data”). The organization (e.g., your employer or another entity or person) (“Customer”) that entered into the Customer Agreement controls its instance of the Services (its “Customer Tenant”) and any associated Customer Data. Your organization's Customer Agreement with doDOC may restrict our collection and use of information more than what is described in this Privacy Policy.

This Privacy Policy does not apply to any third-party applications or software that integrate with the Services through the doDOC application (“Third Party Services”), or

any other third party products, services or businesses. doDOC periodically reviews the Privacy Policy of those third-parties. For other integrations requested by customers, the customer is responsible for reviewing and validate those Privacy Policies.

Please read the following carefully to understand how we will collect, use, and maintain your personal information. It also describes your choices regarding use, access and correction of your personal information.

4. Distribution List

All external stakeholders.

5. Information We Collect And Receive

doDOC may collect and receive Customer Data and other information (“Other Information”) in a variety of ways:

- **Customer Data.** Customers or individuals granted access to a Customer Tenant by Customer (“Authorized Users”) routinely submit Customer Data to doDOC when using the Services.
- **Other Information.** doDOC also collects, generates and/or receives other Information:
 - **Customer Tenant and Account Information.** To create or update a Customer Tenant account, you or Customer (e.g., your employer) supply doDOC with an email address, phone number, password, domain and/or similar account details. In addition, if Customer purchases a paid version of the Services, it provides doDOC (or its payment processors) with billing details such as credit card information, banking information and/or a billing address.
 - **Usage Information.**
 - **Services Metadata.** When an Authorized User interacts with the Services, metadata is generated that provides additional context about the way Authorized Users work.
 - **Log data.** Our servers automatically collect information when you access or use our Websites or Services and record it in log files. This log data may

include the Internet Protocol (IP) address, the address of the web page visited before using the Website or Services, browser type and settings, the date and time the Services were used, information about browser configuration and plugins, language preferences and cookie data.

- **Device information.** doDOC collects information about devices accessing the Services, including type of device, what operating system is used, device settings, application IDs, unique device identifiers and crash data. Whether we collect some or all of this Other Information often depends on the type of device used and its settings.
- **Location information.** We receive information from you, Customer and other third-parties that helps us approximate your location. We may, for example, use a business address submitted by your employer, or an IP address received from your browser or device to determine approximate location. doDOC may also collect location information from devices in accordance with the consent process provided by your device.
- **Third Party Services.** Customer can choose to permit or restrict Third Party Services for its Customer Tenant. Typically, Third Party Services are software that integrates with our Services, and a Customer can permit its Authorized Users to enable and disable these integrations for its Customer Tenant. doDOC may also develop and offer doDOC applications that connect the Services with a Third Party Service. Once enabled, the provider of a Third Party Service may share certain information with doDOC. For example, if a cloud storage application is enabled to permit files to be imported to a Customer Tenant, we may receive the username and email address of Authorized Users, along with additional information that the application has selected to make available to doDOC to facilitate the integration. Authorized Users should check the privacy settings and notices in these Third Party Services to understand what data may be disclosed to doDOC. When a Third Party Service is enabled, doDOC is authorized to connect and access Other Information made available to doDOC in accordance with our agreement with the Third Party Provider and any permission(s) granted by Customer (including, by its Authorized User(s)). We do not, however, receive or store passwords for any of these Third Party Services when connecting them to the Services.

- **Contact Information.** In accordance with the consent process provided by your device, any contact information that an Authorized User chooses to import is collected when using the Services.
- **Third Party Data.** doDOC may receive data about organizations, industries, lists of companies that are customers, Website visitors, marketing campaigns and other matters related to our business. This data may be combined with Other Information we collect and might include aggregate-level data, such as which IP addresses correspond to zip codes or countries. Or it might be more specific: for example, how well an online marketing or email campaign performed.
- **Additional Information Provided to doDOC.** We also receive Other Information when submitted to our Websites or in other ways, such as if you participate in a focus group, contest, activity or event, apply for a job, enrol in a certification program or other educational program hosted by doDOC or a vendor, request support, interact with our social media accounts or otherwise communicate with doDOC.

Generally, no one is under a statutory or contractual obligation to provide any Customer Data or Other Information (collectively, “Information”). However, certain Information is collected automatically and, if some Information, such as Customer Tenant setup details, is not provided, we may be unable to provide the Services.

6. How we use information

Customer Data will be used by doDOC in accordance with Customer’s instructions, including any applicable terms in the Customer Agreement and Customer’s use of Services functionality, and as required by applicable law. doDOC is a processor of Customer Data and Customer is the controller. Customer may, for example, use the Services to grant and remove access to a Customer Tenant, assign roles and configure settings, access, modify, export, share and remove Customer Data and otherwise apply its policies to the Services.

doDOC does not access Customer Data that is stored in the Customer Tenant other than for Maintenance or at the expressed request of the Customer.

doDOC uses Other Information in furtherance of our legitimate interests in operating our Services, Websites, and business. More specifically, doDOC uses Other Information:

- **To provide, update, maintain, and protect our Services, Websites, and business.** This includes the use of Other Information to support the delivery of the Services under a Customer Agreement, prevent or address service errors, security or technical issues, analyze and monitor usage, trends, and other activities, or at an Authorized User's request.
- **As required by applicable law, legal process or regulation.**
- **To communicate with you by responding to your requests, comments and questions.** If you contact us, we may use your Other Information to respond.
- **To send emails and other communications.** We may send you service, technical, and other administrative emails, messages, and other types of communications. We may also contact you to inform you about changes in our Services, our Services offerings, and important Services-related notices, such as security and fraud notices. These communications are considered part of the Services and you may not be able to opt-out of them. In addition, we sometimes send emails about new product features, promotional communications, or other news about doDOC. These are marketing messages so you can control whether you receive them. If you have additional questions about a message you have received from doDOC please reach out through the contact mechanisms described below.
- **For billing, account management and other administrative matters.** doDOC may need to contact you for invoicing, account management, and similar reasons and we use account data to administer accounts and keep track of billing and payments.
- **To investigate and help prevent security issues and abuse.** If Information is aggregated or de-identified so that it is no longer reasonably associated with an identified or identifiable natural person, doDOC may use it for any business purpose. To the extent Information is associated with an identified or identifiable natural person and is protected as personal data under applicable data protection law, it is referred to in this Privacy Policy as "Personal Data."

7. Data Retention

doDOC will retain Customer Data in accordance with a Customer's instructions, including any applicable terms in the Customer Agreement and Customer's use of Services functionality, and as required by applicable law. Depending on the Services plan, Customer may be able to customize its retention settings.

The deletion of Customer Data and other use of the Services by Customer may result in the deletion and/or de-identification of certain associated Other Information.

doDOC may retain Other Information pertaining to you for as long as necessary for the purposes described in this Privacy Policy. This may include keeping your Other Information after you have deactivated your account for the period of time needed for doDOC to pursue legitimate business interests, conduct audits, comply with (and demonstrate compliance with) legal obligations, resolve disputes, and enforce our agreements.

8. How we Share and Disclose Information

This section describes how doDOC may share and disclose Information. Customer determines its own policies and practices for the sharing and disclosure of Information, and doDOC does not control how they or any other third parties choose to share or disclose Information.

- **Customer's Instructions.** doDOC will solely share and disclose Customer Data in accordance with Customer's instructions, including any applicable terms in the Customer Agreement and Customer's use of Services functionality, and in compliance with applicable law and legal process.
- **Displaying the Services.** When an Authorized User submits Other Information, it may be displayed to other Authorized Users in the same or connected Customer Tenants. For example, an Authorized User's email address may be displayed with their Customer Tenant profile. Please consult the Help Center for more information on Services functionality.
- **Customer Access.** Owners, administrators, Authorized Users, and other Customer representatives and personnel may be able to access, modify, or restrict access to Other Information. This may include, for example, your employer using Service

features to export logs of Customer Tenant activity, or accessing or modifying your profile details.

- **Third Party Service Providers and Partners.** We may engage third party companies or individuals as service providers or business partners to process Other Information and support our business. These third parties may, for example, provide virtual computing and storage services.
- **Third Party Services.** Customer may enable or permit Authorized Users to enable Third Party Services. When enabled, doDOC may share Other Information with Third Party Services. Third Party Services are not owned or controlled by doDOC and third parties that have been granted access to Other Information may have their own policies and practices for its collection, use, and sharing. Please check the permissions, privacy settings, and notices for these Third Party Services or contact the provider for any questions.
- **During a Change to doDOC's Business.** If doDOC engages in a merger, acquisition, bankruptcy, dissolution, reorganization, sale of some or all of doDOC's assets or stock, financing, public offering of securities, acquisition of all or a portion of our business, a similar transaction or proceeding, or steps in contemplation of such activities, some or all Other Information may be shared or transferred, subject to standard confidentiality arrangements.
- **De-identified Usage Data.** We may disclose or use de-identified Other Information for any purpose. For example, we may share de-identified Other Information with prospects or partners for business or research purposes, such as telling a prospective doDOC customer the usage or quality metrics.
- **To Comply with Laws.** If we receive a request for information, we may disclose Other Information if we reasonably believe disclosure is in accordance with or required by any applicable law, regulation, or legal process.
- **To enforce our rights, prevent fraud, and for safety.** To protect and defend the rights, property, or safety of doDOC or third parties, including enforcing contracts or policies, or in connection with investigating and preventing fraud or security issues.
- **With Consent.** doDOC may share Other Information with third parties when we have consent to do so.

9. Security

doDOC takes security of data very seriously. doDOC works hard to protect Other Information you provide from loss, misuse, and unauthorized access or disclosure. These steps take into account the sensitivity of the Other Information we collect, process and store, and the current state of technology. doDOC is currently preparing the ISO 27001 certification. By implementing this standard and all of its controls, doDOC is offering a consistent information security system.

Given the nature of communications and information processing technology, doDOC cannot guarantee that Information during transmission through the Internet or while stored on our systems or otherwise in our care will be absolutely safe from intrusion by others. When you click a link to a third-party site, you will be leaving our site and we don't control or endorse what is on third-party sites.

10. Changes to This Privacy Policy

doDOC may change this Privacy Policy from time to time. Laws, regulations, and industry standards evolve, which may make those changes necessary, or we may make changes to our services or business. We will post the changes to this page and encourage you to review our Privacy Policy to stay informed. If we make changes that materially alter your privacy rights, doDOC will provide additional notice, such as via email or through the Services. If you disagree with the changes to this Privacy Policy, you should deactivate your Services account. Contact Customer if you wish to request the removal of Personal Data under their control.

11. Security Team

To communicate with our Security Team, please send an email to security@dodoc.com.

12. Your Rights

Subject to any exemptions provided by law, you may have the right to request access to Information, as well as to seek to update, delete or correct this Information. You can usually do this using the settings and tools provided in your Services account. If you

cannot use the settings and tools, contact the Customer who controls your Customer Tenant for additional access and assistance. Please check doDOC/profile/settings for Customer contact information.

To the extent that doDOC's processing of your Personal Data is subject to the General Data Protection Regulation, doDOC relies on its legitimate interests, described above, to process your data. doDOC may also process Other Information that constitutes your Personal Data for direct marketing purposes, and you have a right to object to doDOC's use of your Personal Data for this purpose at any time.

13. Data Protection Authority

Subject to applicable law, you also have the right to (i) restrict doDOC's use of Other Information that constitutes your Personal Data and (ii) lodge a complaint with your local data protection authority. If you are a resident of the European Economic Area and believe we maintain your Personal Data within the scope of the General Data Protection Regulation (GDPR), you may direct questions or complaints to our lead supervisory authority:

Portuguese Data Protection Authority

Av. D. Carlos I, 134 - 1.º

1200-651 Lisboa

Tel: +351 213928400

Fax: +351 213976832

e-mail: geral@cnpd.pt

14. Contacting doDOC

Please also feel free to contact doDOC if you have any questions about this Privacy Policy or doDOC's practices, or if you are seeking to exercise any of your statutory rights. doDOC will respond within a reasonable timeframe. You may contact us at security@dodoc.com or at our mailing address below:

doDOC Corp

One Boston Place

Suite 2600

02108 Boston, MA, USA

or

doDOC Unipessoal LDA

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