

# Privacy Policy

Last Modified: 22 July 2021

## About this Privacy Policy

By means of this Privacy Policy, Aircall provides you with information about how it uses Personal Data as a Data Controller.

*By “**Aircall**” we mean, depending on the context, the Aircall group of companies comprising entities listed in section 11 of this Privacy Policy or a particular entity from the said list. Different entities in Aircall group may have different roles in your Personal Data processing depending, above all, on your location. An explanation on which are the roles of the Aircall’s entities in using your Personal Data is provided in the respective chapters hereof.*

*By “**Personal Data**” we mean any data or information that enables the identification of an individual (whether directly or indirectly), such as their family name, first name, photograph, post address, email address, telephone number, data relating to their transactions, detail of their orders and subscriptions, IP address, cookies, voice, as well as any other information*

*about them. Under this term we also cover all personally identifiable information (PII), as may be defined by certain regulations.*

*By “**Data Controller**” we mean the Aircall company that determines the purposes and means of processing and is generally responsible, under the data protection laws, for the legality of the usage of your personal data.*

Aircall uses your Personal Data as a Data Controller - on its own behalf - in the following situations:

- If you use Aircall product and Services that require an Aircall account (we further call you “**Aircall User**”), Aircall will process some of your Personal Data as a Data Controller under certain circumstances described below. An Aircall User is typically a representative or an employee of Aircall’s Customer or of a prospect (a company that is about to become Aircall’s Customer) who acts as our Customer’s agent. If you are an Aircall User, Sections 1 and 3-10 apply to Aircall’s processing of your Personal Data. Also, Aircall likely processes, acting as a Data Processor, your Personal Data for other purposes than those stated herein – for more information about such processing (as well as for exercising your rights related to Personal Data Processing) you should contact the corresponding Aircall Customer – the Data Controller.
- You simply visit the Site (we further call you “**Site Visitor**”) - without being logged into your Aircall account, in case you are also an Aircall User. If you are a Site Visitor, Sections 2 and 3-10 apply to Aircall’s processing of your Personal Data.

*By “**Site**” we mean Aircall’s website: <https://aircall.io>.*

Aircall is a global service provider and, correspondingly, it collects Personal Data in different locations globally and from individuals across globe. Thus, different privacy (personal data protection) laws apply to Aircall’s usage of

your Personal Data. Aircall strives to follow the highest standards of protection of your personal data, respecting, on the other hand, local differences in applicable regulation. This Privacy Policy applies to Aircall's processing of Personal Data globally.

Unless otherwise provided herein, all terms starting with a capital letter shall have the meaning ascribed to them in Aircall's Terms of Use.

By **"Terms of Use"** we mean Aircall Terms of Use which appear at <https://aircall.io/terms-of-use/sas/> for the European version and at <https://aircall.io/terms-of-use/inc/> for the North American (US & Canada) version.

If this Privacy Policy does not answer all your questions or concerns, you may also consult our [Privacy FAQs](#).

# 1. Aircall User's Personal Data Processing

The Data Controller of Aircall User's Personal Data is such Aircall entity, which is a contracting party to Customer to whose account your Aircall usage is linked. It is always one of Aircall's entities listed [here](#).

The table below indicates the different purposes your Personal Data, as an Aircall User, may be processed by Aircall as a Data Controller, as well as their different categories, the legal basis the processing is based on, categories of their recipients and information about the period for which we process your Personal Data for the particular processing purpose (retention period). In

addition to the purposes listed below, Aircall may also process personal data as required by applicable law.

<b>Purpose and included processing activities</b>	<b>Categories of Personal Data</b>	<b>Legal basis</b>	<b>Categories of Recipients</b>  <i>See also Section 3 for other recipients</i>	<b>Retention</b>
<p><b>Management of customer accounts, incl. ensuring customer experience</b></p> <p><i>Analytics of user behaviour within the Aircall product.</i></p> <p><i>Analysis (manual) of customer usage of Aircall product and communication with the customer by Success Managers.</i></p>	<p>Customer's account data</p> <p>Customer's financial/payment data Call data - other (notes, tags, insight cards)</p> <p>Information about agent</p> <p>Customer's contact data (from contact list)</p> <ul style="list-style-type: none"> <li>- Customer's account data</li> <li>- Customer's financial/payment data</li> <li>- Call data - other (notes, tags, insight cards)</li> </ul>	<p>Processing is necessary for legitimate interests pursued by Aircall (<i>To provide Aircall Services to Customers, to enhance user experience, to improve, develop and administer Aircall products and services</i>).</p>	<p>Hosting provider</p> <p>Providers of infrastructure services</p> <p>CRM providers</p> <p>Telecommunication carriers and operators</p>	<p>Duration of relationship with the Customer</p>

<p><b>Processing customer's requests</b></p> <p><i>Coordinating and analyzing requests submitted by Customers and Aircall Users via Customer Support Portal on Aircall's website.</i></p>	<p>Customer's account data</p> <p>Customer's financial/payment data</p> <p>Information about agent</p> <p>Customer's contact data (from contact list)</p> <p>Call/SMS metadata</p> <p>Call data - other (notes, tags, insight cards)</p>	<p>Processing is necessary for legitimate interests pursued by Aircall (<i>To provide Aircall Services to Customers, to enhance user experience, to improve, develop and administer Aircall products and services</i>).</p>	<p>Hosting provider</p> <p>Providers of ticketing solutions</p>	<p>Up to 3 years following the request</p>
<p><b>Protection of security and integrity of Aircall's systems and infrastructure</b></p> <p><i>Analyzing usage, access, and other metrics across Aircall systems; implementing proactive and reactive security measures</i></p>	<p>Customer's account data</p> <p>Information about agent</p> <p>Customer's contact data (from contact list)</p> <p>Call/SMS metadata</p> <p>Call data - other (notes, tags, insight cards)</p>	<p>Processing is necessary for legitimate interests pursued by Aircall (<i>To provide Aircall Services securely, as contracted between Aircall and its Customers</i>).</p>	<p>Hosting provider</p> <p>Providers of infrastructure services</p>	<p>Duration of relationship with the Customer</p>

<p><b>Invoicing</b></p> <p><i>Preparation of invoice based on customer's usage of the Aircall product.</i></p>	<p>Call/SMS metadata</p> <p>Customer's account data</p>	<p>Processing is necessary for legitimate interests pursued by Aircall (<i>To be able to bill Aircall Services based on usage of Aircall services, as contracted between Aircall and the Customer</i>).</p>	<p>Providers of billing management tools</p>	<p>Up to 1 month following the call is made or SMS is sent</p>
<p><b>Cash collection</b></p> <p><i>Administration of billing and cash collection, including handling requests from customers regarding payments and invoices and any other billing related requests.</i></p>	<p>Customer's account data</p> <p>Customer's financial/payment data</p>	<p>Processing is necessary for legitimate interests pursued by Aircall (<i>To be able to claim payment of outstanding invoices</i>).</p>	<p>Providers of billing management tools</p> <p>Providers of payment solutions</p>	<p>Up to 6 month following invoice is sent to customer</p>
<p><b>Protection of Aircall's rights and interests</b></p> <p><i>Personal data storage for potential disputes, claim, question or disagreement and its potential usage in case that dispute, claim, question or disagreement arises.</i></p>	<p>Customer's account data</p> <p>Information about agent</p> <p>Call data - other (notes, tags, insight cards)</p> <p>Call/SMS metadata</p>	<p>Processing is necessary for legitimate interests pursued by Aircall (<i>To be able to initiate or respond to claims and questions</i>).</p>	<p>None.</p>	<p>Up to 1 year following termination of relationship with the Customer</p>
<p><b>Responding to access requests from law enforcing authorities under applicable</b></p>	<p>Call/SMS metadata</p>	<p>Processing is necessary for compliance with legal obligations to</p>	<p>None.</p>	<p>As required by applicable law - retention periods ranging</p>

<p><b>telecommunications law</b></p> <p><i>As a telecommunications service provider, Aircall is obliged by the laws of certain countries to keep call/SMS metadata (also called traffic data) for a certain period and disclose them upon a binding request for this reason, we store the call/SMS metadata for this period.</i></p>		<p>which Aircall is subject.</p>		<p>from 1 to 6 years</p>
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You are invited to contact us via means provided in Section 10 hereof for more information about the said categories of recipients.

We do not store any bank information or credit details on our servers, provided that they are handled by a trusted third party independent and different from Aircall.

## 2. Site Visitor's Personal Data Processing - Cookies

If you are a Site visitor, the Personal Data we process about you are the cookies.

The Data Controller of Site Visitor's cookies is Aircall SAS, the identity and the contact details of Aircall SAS can be found [here](#).

Cookies are alphanumeric identifiers / trackers that are transferred to the device you use to access the Services via your browser. We may implement two types of cookies: technical cookies and advertising cookies.

We use **technical cookies** to facilitate your browsing experience (such as session cookies so that you do not have to retype your login and password when you connect to your account for example). They simplify your visit and enhance your experience of the Services. You can refuse the installation of technical cookies in your browser settings. However, you acknowledge that this refusal could prevent you from using the Services.



In addition, we also implement **advertising cookies** which result in the display of targeted advertising on websites that matches your previous/current browsing activity. Advertising cookies enable the use of the retargeting technique which is a marketing model purporting to propose tailored advertisements to the end user. As you browse on the Site, advertising cookies will be placed in your computer so that we can understand what you are interested in. Our display advertising partners enable Aircall to present you with retargeting advertising on other websites based on your previous interaction with the Site. Our partners do not collect traditional forms of personal information such as your name, email address, post address or telephone number but only your IP address and/or an advertising ID.

The cookies used by the Site are the following:

<b>Identification of the cookie</b>	<b>Purpose</b>	<b>Nature</b>	<b>Opt-out</b>
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Google Ad Service	Retargeting ads	Advertising	<a href="#">Opt-out</a>
Google Analytics	Use of the Site	Performance	<a href="#">Opt-out</a>
Google Tag Manager	Use of the Site	Performance	<a href="#">Opt-out</a>
Intercom	Live chat	Functionality	<a href="#">Opt-out</a>
Pardot	Retargeting emails	Marketing	<a href="#">Opt-out</a>
Wistia	Use of Our Videos	Performance	<a href="#">Opt-out</a>
Zarget	A/B testing	Performance	<a href="#">Opt-out</a>

Facebook	Retargeting ads	Advertising	
Amplitude	Use of the Site	Performance	
Stripe	Payment	Fraud detection	

If you click on the “Accept / Agree” button on the cookies banner upon your first visit on the Site, you will be deemed to have agreed to the use of cookies by Aircall on your devices. In addition, the use of the Site may result in the installation of certain cookies issued by third parties (communication agencies, audience measurement companies, social networks, YouTube, etc.) that are not controlled by Aircall. These cookies are subject to such third parties’ privacy policies.

The default settings for Internet browsers are usually set to accept cookies, but you can easily change Your browser’s settings. For more information please visit: <http://www.aboutcookies.org/>.

Please note that if you refuse the installation or use of a cookie, a "refusal cookie" will be installed on your device to track your refusal. You need to ensure that you do not delete this cookie so that your choice is taken into account. You may also use a cookie management software, such as the

TarteAuCitron or TagCommander software. A list of additional software is also available on the French data protection authority (CNIL) website.

*“CNIL” stands for Commission nationale de l’informatique et des libertés the French national data protection authority.*

### **3. Other recipients of the collected Personal Data**

Only our personnel, the services in charge of control (especially: external auditor) and our recipient subcontractors may have access to your Personal Data.

Personal Data may also be disclosed in response to lawful requests made by government agencies or public authorities, including public officers or debt collection organizations, to meet national security, law enforcement or any other legal requirements.

Depending on where you are located, we might have to enforce local regulations and requirements where the use of a local phone number requires to keep user details (in particular, first/last name and address) in the event we should receive an official request from a competent local authority.

### **4. Retention of Personal Data**

We retain the Personal Data where we have an ongoing legal bases to do so. When we no longer have legal bases to process Personal Data, we will either delete or aggregate it or, if this is not possible (for example, because Personal Data has been stored in backup archives), then we will securely store it and isolate it from any further processing until deletion is possible.

We may retain Personal Data to comply with our legal or regulatory obligations. In any case, upon ceasing or lifting of such obligations, Personal Data shall be removed from our systems and records, as well as that of our subcontractors, if any, or otherwise archived or anonymized so that they can no longer be identified.

## **5. Personal Data Transfer outside of the European Union**

Aircall transfers Personal Data to countries located outside the European Economic Area, Switzerland or the United Kingdom (collectively, “Europe”), namely to the United States.

Personal Data can also be processed by mere access by individuals working outside Europe who work for us or for one of our trusted service providers (Data Processors).

We have implemented suitable safeguards designed to transfer Personal Data outside Europe in a secure manner and in compliance with the applicable regulations, most significantly with the GDPR. We also require the importers of the Personal Data to comply with, above all, security requirements of the GDPR. We execute appropriate contractual arrangements to deal with such transfers, namely the standard contractual clauses adopted by the

Commission of the European Union and, following a thorough assessment, additional measures as required by European Data Protection Board's (EDPB) Recommendation no. 1/2020. You are invited to contact us via means provided in Section 10 hereof for more information in relation to the said safeguards.

Aircall also keeps monitoring the legislative development and latest guidance in relation commits to cooperate with EU data protection authorities (DPAs) and comply with the advice given by such authorities.

## **6. Third parties' links on the Site**

Our Site and Services may include links to and from the websites of our partners, advertisers and affiliates. If you follow a link to any of these websites, please note that these companies have their own privacy policies and that Aircall is not responsible or liable for any use of Personal Data by such third parties. We recommend that you check their policies before you visit these websites.

## **7. Security**

We undertake to implement precautions, as well as organizational and technical measures, designed to maintain the security, integrity and confidentiality of Personal Data, and in particular to help prevent them from being modified or damaged and stop any unauthorized third party from

accessing them. As an example, our employees' accounts are secured by strong passwords, and they are all bound by confidentiality obligations. All our data is encrypted both in transit and at rest.

If you are Aircall User, please see our [Information Security FAQs](#) here for more information about how your personal data is protected when you use the Aircall product.

## 8. Your rights and choices

In any case where Aircall processes your Personal Data as a Data Controller, you have the following rights:

- To access and obtain a copy of Personal Data that we process;
- To rectify the Personal Data if inaccurate or outdated and/or supplement them if incomplete;
- To object to the processing of Personal Data that is based on legitimate interests;
- To erase Personal Data and to be forgotten;
- To withdraw your consent, at any time, to any processing of your Personal Data that is solely based on your consent;
- To portability you have the right to move, copy or transmit Personal Data relating to them;
- To restrict or limit the processing of Personal Data;
- To set guidelines to organize the use of Personal Data after their death.

Depending on where you are located, you may have additional rights related to calls or other communications you place or receive using Aircall services. Note that in the United States, only Aircall Customers – and not Aircall End Users – are entitled to invoke or waive restrictions that apply to Aircall’s use and disclosure of customer proprietary network information under 47 U.S.C. § 222.

In the event of any dispute, claim, question or disagreement arising from or relating to this Privacy Policy or breach thereof, you may lodge a complaint with a supervisory authority, being it your local authority or the CNIL. Without prejudice to your said right, we invite you to first seek an amicable resolution thereof by contacting Aircall in writing, stating the grounds of your complaint and providing any supporting evidence.

## **9. Amendments**

We may amend the terms of this Privacy Policy from time to time. If You do not agree with the amended version of the Privacy Policy, you should stop using the Services or respectively stop visiting our website. All amended terms automatically become effective on the day when new Privacy Policy is posted on the Site.

Should we add new consent-based processing of Personal Data, we shall ensure to obtain Your consent therefor prior to processing such Personal Data (e.g. via a box to tick).

## 10. Contact us

To exercise any of your rights listed in Section 8 of this Privacy Policy, if you have questions regarding this Privacy Policy or about the security measures we implement, or if you want to share your concerns about our processing of your Personal Data, please contact us by email at [privacy@aircall.io](mailto:privacy@aircall.io).

You may also reach out to us via mail. You may find our local postal addresses [here](#).

## 11. Aircall entities

**Aircall.io, Inc.**, a Delaware corporation with offices at 82 Nassau St #958, New York (USA), NY 10038

**Aircall SAS**, a French société par actions simplifiée whose registered office is at 11-15, rue Saint Georges, 75009 Paris (France), registered with the Paris Registre du Commerce et des Sociétés under No. 807 437 595