

# Privacy Policy

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## **1. Introduction**

24X Ltd recognizes the importance of protecting privacy. Our Privacy Policy describes what personal information we may collect and how we may use and protect any personal information that is made available to us. Save where the context indicates otherwise our Privacy Policy applies to all registered or non-registered Users of our messaging or other Services as defined in our standard [Terms and Conditions](#), including visitors to any of our websites.

Where used in this policy, the term "personal information" means any information identifying or describing an identifiable individual, including, but not limited to information relating to their name, age, gender, reproductive status, marital status, national, ethnic or social origin, sexual orientation, physical or mental health, disability, conscience, belief, culture, language and birth of the individual; educational, criminal or employment history of the individual, financial status or information relating to financial transactions in which they have been involved and any identifying number, address or contact information of the individual.

## **2. Commitment to Privacy**

We are committed to maintaining the confidentiality, integrity and security of personal information and we will take all appropriate technical and organisational security measures to ensure that where any personal information is provided to us it will be protected against loss, destruction and damage, and against unauthorised or accidental access, processing, erasure, transfer, use, modification, disclosure or other misuse.

We shall not disclose to any person any personal data of a data subject that is processed or hosted by us where any such disclosure would not comply in all respects with the provisions of any applicable data protection legislation or regulations relating to the data subject concerned.

A User's phonebook, message content and MSISDNs indicating to whom messages were sent to or received from belong exclusively to that User and will not be disclosed to any third parties without the user's written permission or unless compelled to do so by a court of law.

Where the personal data of any EU member state subject is transferred to 24X Ltd in a non-EU member state for processing, 24X Ltd undertakes to ensure technical and organizational security measures that provide a level of protection appropriate to the risks represented by the processing of such data and in order to protect such data against accidental or unlawful destruction, accidental loss, alteration, unauthorized disclosure or access or any other unlawful form of processing.

Any recipient of any message has the right to know the identity of the sender, and this will be disclosed on request to the recipient.

Our Users may be required to submit limited personal information when accessing the Services including a username, email address and password for the purposes of protecting User accounts against unauthorized

access. In addition, messages, files or other data contained in the Services may contain the personal information of third parties.

We may automatically record certain information about the use of our Services such as account activity (e.g. usage, log-ins, actions taken), data displayed or clicked on (e.g. GUI elements, links), and other log information (e.g. browser type, IP address, date and time of access).

We may use this information to provide authorized persons with usage reports and internally to deliver the best possible service to our clients and Users, such as improving software user interfaces and maintaining a consistent, reliable and secure user experience.

We may also detect and log a User's location and IP address in order to identify the User's geographic region or time zone for routing traffic to geographically based servers or for managing time-sensitive tasks like the sending of notifications.

Like many reputable online companies, our Services, including our website, other online services, applications, email messages and advertisements, if any, may use "cookies" and other technologies such as pixel tags and web beacons to collect information. A cookie is a small data file stored on the web browser on your computer's hard drive. Cookies and other technologies allow us to count how many Users visited certain web pages within our web site, their personal preferences and to measure the effectiveness of our website and electronic advertisements for different computing devices and regions.

We use this information to understand and analyse trends, to administer our websites and to learn about user behaviour on our websites. If a User blocks cookies from being stored on a computer, the functionality of our Services may be negatively affected.

We may carry out and perform functional, statistical, textual, semantic and other forms of analysis of non-personally identifiable data that is hosted or processed by us in relation to our Services. We do this to improve the performance of our Services, to understand the way in which our Services are being utilised, to identify usage patterns, market trends, to gain insights and to formulate new products and service offerings. We may also process, aggregate and anonymize personal data such that it does not reveal any confidential, personal or sensitive data or any features from which confidential, personal or sensitive data may be ascertained. We will never disclose confidential, personal or sensitive data without the direct or indirect consent of the party to whom we owe the duty of confidentiality and/or the data subject concerned. We may process and transfer anonymized data in our reasonable discretion including within the Licensor's group of companies.

### ***3. API's and Third Party Processing***

Where, for the purpose of providing the Services to you, any 24X Ltd Service acts as an Application Programming Interface ("API") for the purpose of specifying how different software systems should interact with each other, or where for that same purpose any 24X Ltd Service interacts with other API's, including third party API's, we may pass and retrieve data, including personal information, between the different software systems and third parties that interact via those API's.

Where we make use of third party service providers to help us provide the Services to you, including for the purposes of retrieving or delivering information, records, notifications or other messages to you or any User's or for hosting or providing any component of our Services, we require such third parties to maintain the confidentiality of any personal information we provide to them for these purposes. Some of these third parties may be situated outside of your country and you consent to your personal data and that of any data subjects you provide to us being transferred cross-border so that we can provide the Services to you. In this regard, we engage only with reputed third party service providers who have security and privacy policies and procedures providing at least the same level of protection as we do ourselves. You warrant that you have all necessary permissions to give us the above consent.

We may share data, including Personal Data, collected from Users of our Services with third-party service providers or consultants who require access to that data to perform their work on our behalf for the purpose of helping us deliver our Services. These third party service providers or consultants are limited to only accessing or using this data to provide the services to us and must provide reasonable assurances that they will appropriately safeguard the data. We may also share non-personal or non-identifiable information, including website visitor information and account usage data with third party analytics service providers.

### ***4. Communications with You***

We may communicate with User's, resellers and other persons by email and other messaging applications. You may opt out from promotional communications from us that are not strictly related to the provision of the Services to you.

### ***5. Personal Information of Minors***

We do not intentionally collect personal identifiable information from anyone who is a minor. If it is discovered that we have unintentionally collected personally identifiable information from a minor other than for a legitimate purpose associated with the Services, we will delete that information immediately.

### ***6. Revisions and Termination***

Our Privacy Policy may be updated from time to time at our discretion and changes will become effective upon posting to the site.

If the 24X Ltd merges with, or is acquired by, any other business, you acknowledge that your personal information may fall under the control of another person.

If you terminate your relationship with 24X Ltd, portions of your personal information may be retained in back-ups and archives for as long as is reasonably necessary to assist us in meeting our legal compliance obligations.

## ***7. Questions and Comments***

If you have questions, comments, concerns or feedback regarding this Privacy Policy, please send an e-mail to [info@24X.com](mailto:info@24X.com).