

Mixvoip Privacy Policy

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

By “**Mixvoip**” we mean, depending on the context, all entities listed in section 12 of this Privacy Policy or a particular entity from the said list.

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 Mixvoip 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. Mixvoip uses your Personal Data as a Data Controller - on its own behalf - in the following situations: You use Mixvoip product and Services (we further call you “Mixvoip User”) - typically a representative or an employee of Mixvoip’s Customer or of a prospect (a company that is about to become Mixvoip’s Customer) and you act as Customer’s agent. If you are an Mixvoip User, Sections 1 and 3-11 apply to Mixvoip’s processing of your Personal Data. Also, Mixvoip 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 Mixvoip Customer – the Data Controller. You simply visit the Site (we further call you “Site Visitor”) - without being logged into your Mixvoip account, in case you are also an Mixvoip User. If you are a Site Visitor, Sections 2 and 3-11 apply to Mixvoip’s processing of your Personal Data.

By “**Site**” we mean Mixvoip’s websites:

<https://www.mixvoip.com>

<https://www.mixvoip.org>

<https://www.voxbi.team>

<https://www.voxbi.com>

Mixvoip 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 Mixvoip’s usage of your Personal Data. Mixvoip 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 Mixvoip’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 Mixvoip’s Terms of Use. By “Terms of Use” we mean Mixvoip Terms and Conditions which appear at <https://media.mixvoip.com/mixvoip-terms-and-conditions-lu.pdf>.

1. Mixvoip User’s Personal Data Processing

The Data Controller of Mixvoip User’s Personal Data is such Mixvoip entity, which is a contracting party to Customer to whose account your Mixvoip usage is linked. It is always one of Mixvoip’s entities listed here.

The information below indicates the different purposes your Personal Data, as a Mixvoip User, may be processed for by Mixvoip 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, Mixvoip may also process personal data as required by applicable law.

1.1. Management of customer’s account

- Management of customer’s account, incl. ensuring customer experience.
- Analytics of user behaviour within the Mixvoip product.
- Analysis (manual) of customer usage of Mixvoip product and communication with the customer by Success Managers.

Categories of Personal Data

- Customer's account data
- Customer's financial/payment data
- Information about agent
- Customer's contact data (from contact list)
- Call metadata
- Call data - other (notes, tags, insight cards)

Legal basis

- Processing is necessary for legitimate interests pursued by Mixvoip (provide Mixvoip Services, to Customers, to enhance your user experience, to improve, develop and administer Mixvoip products and services)

Categories of Recipients

- Hosting provider
- Providers of infrastructure services
- CRM providers
- Telecommunication carriers and operators

Retention: Duration of relationship with the Customer + legal requirements (10 years)

1.2. Processing customer's requests

- Coordinating and analyzing requests submitted by Customers and Mixvoip Users via Customer Support Portal on Mixvoip's websites

Categories of Personal Data

- Customer's account data
- Customer's financial/payment data
- Information about agent
- Customer's contact data (from contact list)
- Call/SMS metadata
- Call data - other (notes, tags, insight cards)

Legal basis

- Processing is necessary for legitimate interests pursued by Mixvoip (To provide Mixvoip Services to Customers, to enhance user experience, to improve, develop and administer Mixvoip products and services).

Categories of Recipients

- Hosting provider
- Providers of ticketing solutions

Retention: Up to 3 years following the request

1.3. Protection of security and integrity of Mixvoip's systems and infrastructure

- Analyzing usage, access, and other metrics across Mixvoip systems; implementing proactive and reactive security measures

Categories of Personal Data

- Customer's account data
- Customer's contact data (from contact list)
- Call/SMS metadata
- Call data - other (notes, tags, insight cards)

Legal basis

- Processing is necessary for legitimate interests pursued by Mixvoip (to ensure your data remain secure, to provide Mixvoip Services securely, as contracted between Mixvoip and its Customers).

Categories of Recipients

- Hosting provider
- Providers of infrastructure services

Retention: Duration of relationship with the Customer

1.4. Invoicing

- Preparation of invoice based on customer's usage of the Mixvoip products & services.

Categories of Personal Data

- Call/SMS metadata
- Customer's account data

Legal basis

- Processing is necessary for legitimate interests pursued by Mixvoip (to be able to bill Mixvoip Services based on usage of Mixvoip services, as contracted between Mixvoip and the Customer).

Categories of Recipients

- Providers of billing management tools

Retention: Up to 10 years following the call is made or SMS is sent

1.5. Cash Collection

- Administration of billing and cash collection, including handling requests from customers regarding payments and invoices and any other billing related requests.

Categories of Personal Data

- Customer's account data
- Customer's financial/payment data

Legal basis

- Processing is necessary for legitimate interests pursued by Mixvoip (to be able to claim payment of outstanding invoices).

Categories of Recipients

- Providers of billing management tools
- Providers of payment solutions

Retention: Up to 10 years following invoice is sent to customer

1.6. Protection of Mixvoip's rights and interests

- Personal data storage for potential disputes, claim, question or disagreement and its potential usage in case that dispute, claim, question or disagreement arises.

Categories of Personal Data

- Customer's account data
- Information about agent
- Call data - other (notes, tags, insight cards)
- Call/SMS metadata

Legal basis

- Processing is necessary for legitimate interests pursued by Mixvoip (To be able to initiate or respond to claims and questions).

Retention: Up to 10 years following termination of relationship with the Customer

1.7. Responding to access requests from law enforcing authorities under applicable law

- As a telecommunications service provider, Mixvoip 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.

Categories of Personal Data

- Call/SMS metadata

Legal basis

- Processing is necessary for compliance with legal obligations to which Mixvoip is subject.

Retention: As required by applicable law - retention periods ranging from 1 to 6 years

You are invited to contact us via means provided in Section 11 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 Mixvoip.

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 Mixvoip Sa, the identity and the contact details of Mixvoip Sa can be found in section 12 below.

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 on the Site. 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 Mixvoip to present you with retargeting advertising on other websites based on your previous interaction with the Site. Our partners do not collect personal information such as your name, email address, post address or telephone number but only your IP address and/or an advertising ID.

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 Mixvoip 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 Mixvoip. These cookies are subject to such third parties' privacy policies.

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he 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.

3. Other recipients of the collected Personal Data

Only our staff, 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. Sale of personal databases

We shall not, without your agreement, sell or let Personal Data to third parties. We shall only transfer Personal Data to another location, whether physical or numerical, if we deem it necessary to provide the Services, or if you specifically agree with it.

5. 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.

6. Personal Data Transfer outside of the European Union

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 11 hereof for more information in relation to the said safeguards. Mixvoip 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.

7. 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 Mixvoip 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.

8. 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 Mixvoip User, please see our Information Security FAQs here for more information about how your personal data is protected when you use the Mixvoip product.

9. Your rights and choices

In any case where Mixvoip 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.

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. Without prejudice to your said right, we invite you to first seek an amicable resolution thereof by contacting Mixvoip in writing, stating the grounds of your complaint and providing any supporting evidence.

10. 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 thereof prior to processing such Personal Data (e.g. via a box to tick).

11. Contact us

To exercise any of your rights listed in Section 9 of this Privacy Policy, if you have questions regarding this Privacy Policy or about the security measures we implement, if you want to complain or share your concerns about our processing of your Personal Data, please contact us by email at dpo@mixvoip.com. You may also reach out to us via mail. You may find our local postal addresses here.

12. Mixvoip entities

Company name:	MIXVOIP Sa
Registered office :	70, rue des Prés, L-7333 Steinsel, Luxembourg
Duly represented by its CEO,	Loïc Didelot
Company name:	MIXVOIP GmbH
Registered office:	Klaus-Kordel-Straße 4, D-54296 Trier, Germany
Duly represented by its Geschäftsführer	Loïc Didelot
Company name:	MIXVOIP Srl
Registered office :	Avenue de Finlande 5, B-1420 Braine l'Alleud. Belgium
Duly represented by its CEO	Pascal Knebler

Steinsel
13/09/2021