

# Privacy Policy

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## Proiga Email Marketing & CRM Platform

Effective Date: March 11, 2026

This Privacy Policy explains how Proiga ("Proiga," "we," "us," or "our") collects, uses, stores, shares, and otherwise processes personal data in connection with our website, platform, applications, integrations, communications, and related services (together, the "Services").

This policy applies to account holders, website visitors, prospective customers, support contacts, and individuals whose information is processed through the Services by our customers.

Because Proiga provides software tools used by businesses, our role may vary depending on the data involved. In many cases, Proiga acts as a service provider or processor on behalf of a customer, while the customer decides why and how contact or campaign data is used. In other cases, such as account administration, billing, security, and our own business operations, Proiga acts as the controller of personal data.

## 1. Introduction

We are committed to handling personal data in a commercially reasonable, transparent, and lawful manner. This policy describes:

- what information we collect;
- how we collect it;
- why we use it;
- when we share it;
- how long we retain it;
- what rights may apply to you; and
- how to contact us regarding privacy matters.

## **2. Information We Collect**

Depending on how you interact with the Services, we may collect the following categories of information.

### **2.1 Account and Profile Information**

This may include name, email address, phone number, company name, account credentials, account preferences, user role, subscription details, billing contact information, and related administrative information.

### **2.2 Customer Contact and Recipient Data**

This may include names, email addresses, company names, job titles, tags, segmentation fields, suppression status, unsubscribe status, bounce status, communication history, notes, and related contact records that customers upload, import, store, or process through the Services.

### **2.3 Campaign and Communication Data**

This may include subject lines, message bodies, templates, drafts, delivery metadata, open and click signals where enabled, reply events, timestamps, unsubscribe events, bounce notifications, complaint events, and follow-up workflow activity.

### **2.4 Technical and Usage Data**

This may include IP address, browser type, operating system, device information, session activity, feature usage, navigation data, log files, approximate geolocation derived from IP, error diagnostics, security events, and performance information.

### **2.5 Transaction and Billing Data**

This may include plan type, invoices, payment status, billing country, partial payment instrument details supplied by payment processors, tax information, and fraud-prevention data. We do not store full payment card numbers.

### **2.6 Support and Communications Data**

This may include messages you send to us, support tickets, onboarding communications, feedback, meeting notes, and related records.

### **2.7 Website Cookies and Similar Technologies**

We may use cookies, local storage, pixels, tags, session tools, and similar technologies to operate the Services, remember preferences, analyze usage, improve performance, secure accounts, and understand how visitors interact with our site.

### **3. Sources of Information**

We may collect information:

- directly from you when you register, subscribe, request a demo, contact support, fill in forms, connect integrations, or otherwise use the Services;
- automatically through logs, cookies, analytics tools, application telemetry, and security tools;
- from customers who upload or input personal data into the Services;
- from third-party integrations, email infrastructure providers, payment processors, analytics tools, and similar service providers; and
- from publicly available or lawfully obtained business information sources where permitted by law.

### **4. How We Use Personal Data**

We may use personal data for the following purposes:

- to provide, maintain, operate, secure, and improve the Services;
- to create and manage accounts;
- to authenticate users and control access;
- to process transactions, subscriptions, renewals, invoices, and payments;
- to provide customer support, onboarding, and account management;
- to send service-related messages, transactional notices, product updates, security alerts, and support responses;
- to enable email delivery, suppression management, bounce handling, reply tracking, analytics, automations, reporting, and related product functionality;
- to monitor, prevent, investigate, and detect abuse, fraud, spam, unauthorized activity, security incidents, and violations of our terms;
- to analyze usage trends, measure platform performance, develop new features, and improve user experience;
- to comply with legal obligations, court orders, lawful requests, and regulatory requirements;

- to enforce contracts, resolve disputes, and protect the rights, safety, systems, and property of Proiga, our users, and others; and
- to create aggregated or de-identified analytics, statistics, benchmarks, and operational insights that do not identify an individual.

## **5. Legal Bases for Processing**

Where required by applicable law, we process personal data on one or more of the following bases:

- performance of a contract or steps taken before entering into a contract;
- legitimate interests, such as operating and improving the Services, securing systems, preventing abuse, and managing our business;
- compliance with a legal obligation;
- consent, where consent is required or we choose to rely on it; and
- other lawful bases permitted by applicable law.

Where a customer uses the Services to process recipient or contact data, that customer is generally responsible for determining the lawful basis for that processing and for complying with marketing, privacy, and data protection laws applicable to its own use.

## **6. Data Sharing and Disclosure**

We do not sell personal data. We may share personal data in the following circumstances:

### **6.1 Service Providers and Subprocessors**

We may share information with hosting providers, infrastructure providers, analytics providers, customer support tools, email infrastructure providers, payment processors, communications tools, contractors, professional advisors, and similar service providers that help us operate the Services.

### **6.2 Within Our Corporate Group**

We may share information with current or future affiliates, subsidiaries, or entities under common control for internal administration, security, compliance, support, and business operations.

### **6.3 Legal and Compliance Reasons**

We may disclose information if we believe in good faith that disclosure is necessary or appropriate to:

- comply with law, regulation, subpoena, court order, or lawful government request;
- enforce agreements or policies;
- detect, prevent, or address fraud, abuse, spam, security, or technical issues; or
- protect rights, property, or safety.

#### 6.4 Business Transfers

We may disclose or transfer information in connection with a merger, acquisition, restructuring, financing, asset sale, bankruptcy, or similar corporate transaction, subject to applicable law.

#### 6.5 With Your Direction or Consent

We may share information where you instruct us to do so, connect a third-party integration, or otherwise consent.

## **7. Role of Customers and Customer Responsibilities**

Where customers upload, import, store, or use contact data, recipient data, campaign data, or similar information through the Services, those customers are generally responsible for:

- ensuring they have the rights, notices, permissions, and lawful basis required for the data they use;
- honoring unsubscribe requests, suppression requests, and other individual rights where required;
- ensuring the legality of messages, campaigns, workflows, and targeting practices; and
- providing their own privacy notices where applicable.

Proiga is not responsible for a customer's independent compliance decisions, mailing practices, list collection methods, or message content except to the extent required by law.

## **8. Cookies and Similar Technologies**

We may use strictly necessary cookies and similar technologies to keep users signed in, maintain sessions, remember settings, protect accounts, balance traffic, and support core functionality. We may also use analytics and performance technologies to understand how the website and Services are used and to improve them over time.

Where applicable law requires consent for non-essential cookies, we will seek consent through an appropriate mechanism. You can usually manage cookies through your browser or device settings. Blocking some cookies may affect functionality.

## **9. Email and Direct Communications**

We may send service-related emails and administrative messages necessary for account operation, billing, security, legal notices, and product functionality. These are generally not promotional in nature.

Where we send marketing communications about our own Services, we will do so in accordance with applicable law and provide unsubscribe or opt-out options where required.

Customers using Proiga for commercial email remain responsible for the legality and compliance of their own campaigns, including CAN-SPAM, GDPR, and other applicable regulations.

## **10. Data Retention**

We retain personal data for as long as reasonably necessary for the purposes described in this policy, including to provide the Services, comply with legal obligations, resolve disputes, enforce agreements, maintain security, and keep appropriate business and financial records.

In general:

- account and subscription records may be retained while the account is active and for a reasonable period afterward;
- contact and campaign data may be retained while the customer account is active, until deleted by the customer, or for a reasonable period after termination;

- logs, telemetry, and security records may be retained for security, fraud-prevention, troubleshooting, and audit purposes;
- financial and transaction records may be retained as required by tax, accounting, and legal obligations.

We may delete or anonymize data when it is no longer reasonably needed, subject to backups, archival systems, technical limitations, legal holds, and compliance obligations.

## **11. International Data Transfers**

We may process and store personal data in countries other than the country where the data was collected, including where our service providers, infrastructure, or personnel are located. Where required by applicable law, we use appropriate safeguards for international transfers, which may include standard contractual clauses or other mechanisms recognized by law.

## **12. Data Security**

We use commercially reasonable administrative, technical, and organizational measures designed to protect personal data against unauthorized access, disclosure, alteration, or destruction. These measures may include encryption in transit, logical access controls, restricted production access, logging, monitoring, backups, and security reviews.

No system or method of transmission or storage is completely secure. Accordingly, we cannot guarantee absolute security.

## **13. Your Privacy Rights**

Depending on your location and applicable law, you may have rights such as the right to:

- request access to personal data;
- request correction of inaccurate data;
- request deletion of personal data;
- request restriction of certain processing;
- object to certain processing;
- withdraw consent where processing is based on consent;

- request portability of certain data; and
- lodge a complaint with a supervisory or regulatory authority.

These rights are not absolute and may be subject to legal exceptions, and limitations under applicable law. To make a privacy request, contact us using the details below.

## **14. Regional Notices**

### 14.1 European Economic Area, United Kingdom, and Similar Jurisdictions

For account, billing, security, website, and business administration data, Proiga may act as a controller. For customer-uploaded contact or campaign data processed through the platform on behalf of a customer, Proiga generally acts as a processor. The customer typically remains responsible for the lawful basis, transparency, and rights handling associated with its own contacts and recipients.

### 14.2 California and Similar United States Privacy Laws

Residents of certain states may have additional rights regarding access, deletion, correction, opt-out, appeal, or limitation of certain uses of personal information, subject to the scope and thresholds of applicable law. We will handle qualifying requests in accordance with applicable law.

### 14.3 Other Jurisdictions

We may provide additional disclosures where required by local law.

## **15. Children's Privacy**

The Services are intended for business users and not directed to children. We do not knowingly collect personal data directly from children where prohibited by law. If you believe a child has provided personal data to us, contact us and we will take appropriate steps.

## **16. Third-Party Services and Links**

The Services may contain links to third-party websites, integrations, or services. We do not control and are not responsible for the privacy practices, content, or security of third parties. Their own terms and privacy policies apply.

## **17. Changes to This Privacy Policy**

We may update this Privacy Policy from time to time to reflect changes in our Services, legal requirements, vendors, or business practices. The updated version becomes effective when posted. Where required by law, we will provide additional notice of material changes.

## **18. Contact Us**

If you have questions, requests, or concerns about this Privacy Policy or our privacy practices, contact: [support@proiga.com](mailto:support@proiga.com).