

## PRIVACY NOTICE

Last updated 12.05.2025

Thank you for your interest in **Matagi OÜ** (hereinafter “**Matagi**”, “**we**,” or “**us**”), our website at [www.matagi.io](http://www.matagi.io) (hereinafter the “**Website**”), and all related mobile applications (including tablet applications), and services provided by us (on which a link to this Privacy Notice is displayed), and all other communications with individuals through email or phone (collectively with the Website, the “**Service**”).

Matagi is a business-to-business (B2B) company. This means our Services are mainly targeted at other businesses. Hence, this Privacy Notice explains how we process the personal data our Clients (individuals representing them) and their Users and Website visitors (hereinafter also “**you**”).

If you are a California resident, please review Section 7 of this Privacy Notice.

To understand what cookies we use, please review our Cookie Notice.

### Definitions

Capitalized terms used but not defined in this Privacy Notice have the meaning given to them in the [Matagi Terms of Service](#).

GDPR means the General Data Protection Regulation (EU) 2016/679), implementation of which started on 25 May 2018 and which is directly applicable in all European Union member states.

Personal data means any information relating to an identified or identifiable natural person (data subject); an identifiable natural person is one who can be identified, directly or indirectly, by a name, an identification number, location data, an online identifier or by one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Controller means the entity that decides why and how the personal data is processed.

Visitor means an individual other than a User who uses the Website but has no access to the Matagi Services.

### 1. Data Controller

#### **Matagi OÜ**

Registration code: 17221751

Address: Valukoja 10, 11415, Tallinn, Estonia

E-mail: [hello@matagi.io](mailto:hello@matagi.io)

### 2. The Data We Process

This Privacy Notice describes Matagi's practices when we act as a data controller. As a data controller, we determine the purposes and means of processing your personal data. This includes data collected directly from you, such as when you sign up for an Account and interact with the Matagi Service. It also covers data collected automatically, such as through cookies and tracking technologies.

We collect different types of information from or through the Service, including, but not limited, as described below.

#### 2.1 Information You Provide Directly to Matagi

- **Account Signup:** When you sign up for an Account to access Matagu Service, we ask for information, like your name, business email address, company name and country, to complete the Account signup process.
- **Payment Processing:** When you buy something from us, we ask you to provide your name, contact information, credit card information or other payment account information. When you submit your card information, we store the name and address of the cardholder, the expiration date and the last four digits of the credit card number. We do not store the actual credit card number.
- **Testimonials:** When you authorize us to post testimonials about Matagi Service on websites, we may include your name and other personal data in the testimonial. You will be given an opportunity to review and approve the testimonial before we post it. If you wish to update or delete your testimonial, you can contact us at [hello@matagi.io](mailto:hello@matagi.io).

## 2.2 Automatically Collected Information

- **Information from Browsers, Devices and Servers:** When you visit our Website, we collect information that web browsers, mobile devices and servers make available, such as the internet protocol address, browser type, language preference, time zone, referring URL, date and time of access, operating system, mobile device manufacturer and mobile network information. We include these in our log files to understand more about Visitors to our Website and accommodate our Websites to the Visitors.
- **Information from Cookies and Other Tracking Technologies:** We use temporary and permanent cookies to identify Visitors and Users and to enhance user experience. We use cookies, beacons, tags, scripts, and other similar technologies to identify Visitors, track Website navigation, gather demographic information about Visitors and Users, understand email campaign effectiveness and target visitor and user engagement. You can learn more about the cookies used on our Website and change your Cookie settings in our Cookie Notice.

## 2.3. Data Obtained from Third-Party Sources

We may collect your personal data from various third parties, as detailed below.

- **Login via Third-Party Authentication Services:** You have the option to access the Service using authentication providers such as Google, Microsoft, or LinkedIn. These services verify your identity and may provide us with certain personal data, including your name and email address, based on your authorization. We advise you to review the privacy settings and policies of each service to understand and manage the information they share with us.
- **Information from Referrals:** We may receive your personal data, such as your name and email address, when another individual or entity refers you to our Service. If you wish to have this information removed from our systems, please contact us at [hello@matagi.io](mailto:hello@matagi.io). If you provide us with information about another person, we will use it solely for the specific purpose for which it was provided.
- **Data from Partners, Resellers, and Events:** Our business partners, resellers, or service providers may share your contact information with us if you express interest in our Service to them. Likewise, if you register for or attend an event sponsored by us, the event organizer may provide us with your information. We may also obtain your data from third-party review platforms or marketing service providers.
- **Data from Third-Party Integrations:** When you connect a third-party application to your account, you may be asked to grant that application certain permissions to access, modify, or transmit your data. It is your responsibility to review the permissions you grant. While we may collect data on which integrations you use, we are not liable for the data handling practices of

these third-party integrations. Please carefully review their terms and privacy policies before authorizing any integration.

- **Publicly Available Information and Social Media:** We may collect information you make publicly available when you engage with us on social media platforms (like Facebook, X, LinkedIn), marketplaces, or review sites. This includes profile information, posts, and comments, which we use to connect with you, improve our Service, and understand user feedback. Please be aware that we may retain this information even if you remove it from the source platform. We may also update your profile with information from other public sources.

### 3. Purposes of Use and Legal Basis

We mainly use your personal to respond to your inquiries and communicate with the business you represent, to send you marketing communications about our Services, from which you can opt-out at any time; to operate and improve our Website, ensure security, and analyze user engagement.

The legal basis for doing this is our legitimate interest – we need to communicate with the legal person and if you act as representative of one, we assume that there is a balance of interest and we do not conflict with your interests, rights and freedoms.

For use of certain website cookies and similar tracking technologies we also ask for your consent as described in our Cookie Notice.

If you represent an existing client, or if you have provided us with your professional contact details when inquiring about our Services, we may send you marketing communications by e-mail. These communications will be relevant to your professional interests and concern our similar products or services. We process your personal data for this purpose based on our legitimate interest to develop our business relationship and keep you informed of our offerings. You have the right to opt out of receiving these communications at any time by clicking the "unsubscribe" link provided in every e-mail.

### 4. Sharing Your Data

Your personal data is accessible to our employees on a need-to-know basis. We may also share your information with the following categories of third parties:

- **Data Visibility Within Your Organization's Account.** Information pertaining to your activity within the Matagi Service is accessible to the designated Admin(s) of your organization's Account. Depending on the configurations established by account users, this information may also be visible to other users within the same Account to facilitate the proper functioning of the Matagi Service.
- **Sharing with Third-Party Service Providers.** We engage third-party service providers to perform essential functions on our behalf, including Website and application development, hosting, maintenance, security monitoring, and fraud detection. In the course of providing these services, these third parties may need to access or process personal data. We ensure that the information provided to these service providers is limited to what is reasonably necessary for them to execute their functions. Furthermore, our contractual agreements with these parties obligate them to maintain the confidentiality and security of such information.
- **Legal Disclosures and Protection of Rights.** We may disclose your personal data or other information when compelled by law or when we have a good-faith belief that such action is necessary to: (a) Comply with a legal obligation, a valid court order, or a government-issued subpoena or warrant; (b) Cooperate with law enforcement or other public authorities; (c) Protect and defend our rights, property, and the safety of our company, users, or the public. This includes, but is not limited to, taking precautions against liability, preventing fraudulent or

unlawful activity, and enforcing our contracts; (d) Investigate and respond to third-party claims or allegations made against us; (e) Safeguard the security and integrity of our Service and its underlying infrastructure. We reserve the right to make such disclosures at our sole discretion and may do so without providing notice to you.

- **Third Parties in Corporate Transactions:** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business by another company.

### **Data Location and International Transfers**

Your personal data may be processed and stored on servers located outside your country of residence, including in the European Economic Area (EEA) and the United States (USA). The nature of our services requires a global infrastructure, and the location of your data may vary depending on the service you use and your location.

**Data Transfers from the EEA:** When we transfer personal data originating from the EEA to countries outside the EEA (such as the USA) that have not been deemed to provide an adequate level of data protection by the European Commission, we will ensure the lawfulness of the transfer.

We implement appropriate safeguards for this purpose, relying primarily on the Standard Contractual Clauses (SCCs) approved by the European Commission.

### **5. Data Retention**

Our policy is to retain Personal Data for the duration necessary to serve the original purpose of collection and to comply with legal duties, resolve disputes, and enforce agreements.

When retention is no longer required for any legitimate business need, we will delete or anonymize the data from our operational environments. Data within backups will be securely isolated and stored pending deletion according to our established procedures.

For data processed by Matagi Service, the following retention schedules apply:

- **Accounts:** Deletion within 180 days of closure.
- **Free Trial Accounts:** Deletion within 60 days of closure.
- **Server Backups:** Retention for 90 days.

### **6. Your Privacy Rights**

*Right to access* – you have the right to know which data we hold about you (if any).

*Right to data rectification* – you have the right to require corrections to your personal data in case they are inaccurate or incomplete.

*Right to data deletion* – you have the right under certain conditions to request the deletion of your personal data including in situations where the processing of your personal data is no longer necessary for the purposes for which it was collected, or if the processing of your personal data was based on your consent and you wish to withdraw your consent, and there are no other grounds for processing your personal data.

*Right to restrict processing* – you have the right under certain circumstances to forbid or restrict the processing of your personal data for a certain period (e.g. you have submitted an objection concerning data processing).

*Right to object* – You have the right to object to data processing which is based on our legitimate interest. We will stop processing your personal data upon such objection, unless we can demonstrate compelling legitimate grounds for the processing or processing is needed for the establishment, exercise, or defense of legal claims. **You also have the right to object at any time to processing of**

**your personal data for direct marketing. Upon receiving such objection, we shall stop processing your personal data for direct marketing.**

You may submit a request to exercise these rights. To protect your information, we will verify your identity using a method appropriate for the request. To submit a request to exercise your rights, please contact us at [\[e-mail\]](#).

## 7. California Residents: Your Privacy Rights

Pursuant to the California Consumer Privacy Act of 2018 ("CCPA"), residents of California are afforded specific rights regarding their Personal Data. This section outlines how we handle your information and how you can exercise those rights.

**7.1 Information we collect.** In the 12 months prior to the effective date of Privacy Notice, we have collected various categories of personal data from California consumers. This information may be gathered directly from you, from your interactions with our Services, or from third-party sources as described in Section 2 above. The categories are as follows:

- **Identifiers:** Such as your name, email address, postal address, or phone number.
- **Commercial Data:** Including transaction history and records of products or services you have purchased.
- **Network and Device Activity:** Technical information related to your use of our Website and Service, such as browsing history and interaction data.
- **Geolocation Information:** Approximate location derived from your IP address.
- **Financial Data:** Payment details or financial account information required to process subscriptions or purchases.
- **Support and Communication Data:** Information you provide when contacting our support channels (e.g., help desks, surveys, contests).
- **Inferences:** Insights or conclusions drawn from any of the data categories listed above to create a profile about your preferences.

We retain this personal data only for as long as is reasonably necessary for the purpose(s) for which it was collected, in accordance with our business, legal, and regulatory obligations.

**7.2 Purpose of Collection and Disclosure.** We collect the personal data categories listed above for operational and commercial purposes, as explained in Section 3. In the preceding 12 months, we have disclosed each of these categories to our service providers to facilitate these business purposes, as described in Section 4.

**7.3 Sale and Sharing of Personal Data for Advertising.** In the past 12 months, we have not disclosed any personal data to third-parties for advertising purposes or sold it to anyone. We do not have actual knowledge of selling or sharing the Personal Data of any individual under the age of 16.

**7.4 Your Rights Under the CCPA** As a California resident, you are entitled to the following rights:

- **Right to Know:** You may request details about the specific pieces and categories of personal data we have collected, used, disclosed, or sold about you.
- **Right to Delete:** You may request the deletion of personal data that we have collected from you, subject to certain exceptions.
- **Right to Opt-Out of Sale/Sharing:** You have the right to instruct us not to sell or share your personal data.
- **Right to Correct:** You may request that we correct any inaccurate personal data we maintain about you.
- **Right to Non-Discrimination:** We will not discriminate against you for exercising any of your CCPA rights.

**7.5 How to Exercise Your Rights.** You may submit a request to exercise these rights. To protect your information, we will verify your identity using a method appropriate for the request. You may also designate an authorized agent to make a request on your behalf. We will require written proof that you have designated the agent and will also need to verify your own identity directly with us. To submit a request to exercise your rights, please contact us at [\[e-mail\]](#).

## **8. The Right to Submit Complaints**

Should you desire further information concerning your personal data or exercising your rights, you have the possibility to contact us at [hello@matagi.io](mailto:hello@matagi.io).

If you believe that the processing of your personal data breaches the legal requirements you have the right, without prejudice to any other administrative or judicial remedy, to file a complaint with an appropriate supervisory authority. In Estonia, the relevant supervisory authority is Data Protection Inspectorate (*Andmekaitse Inspektsioon*).

## **9. Amending This Privacy Notice**

We may update this Privacy Notice from time to time. The updated version will be indicated by a revised "Last updated" date. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.