

# **Policies and Procedures**

See the steps we take to ensure your privacy and protection with Laylo

## **About**

We are committed to our users' rights to privacy. We promise to share transparently all aspects of how the Laylo product and website work in regards to privacy, terms, and personal data, and we are in full support of efforts to ensure your protection online.

The following is a collection of information and resources to help answer any questions you have about your experience with Laylo. We're grateful for your interest and proud to have you as a part of our community!

## **GDPR compliance**

The EU's General Data Protection Regulations (GDPR) took effect May 25 2019, and we are fully behind the spirit of these regulations for a safe and secure Internet. We aspire to embrace privacy by design and, whenever possible, to not collect and store personally-identifiable information.

Our Privacy Policy contains mentions of the few instances where personally-identifiable information is required. Typically this will include an email address or phone number in order to log in to Laylo or a social network username in order to manage your account.

Overall, we aim for privacy by default: if data collection is not integral to the way our product works, then we won't collect it. As such, you may see few banners or forms requesting consent for us to collect personally-identifiable information for tracking or other purposes.

At any time, you may request your information to be exported and sent to you for review, and we promptly honor any requests by you to have your information deleted and forgotten.

**Here is what we've done for GDPR compliance:**

**Data Mapping**

*Status: In Progress*

We are auditing all areas of Laylo to determine what personal data we collect and for what purpose. In a case where collecting personal data is not essential, we are removing that collection process.

## **Privacy Policy**

*Status: Complete*

We aim to ensure that our policy contains the proper language, that it's easy to understand, and that it communicates clearly any instances of personal data collection.

## **Cookies**

*Status: In Progress*

We have added a cookie notice to all marketing pages and blogs in order to comply with the E-Privacy Directive. We do not collect personally-identifiable information with our cookies, but we do want to acknowledge the use of cookie technology on our website.

## **Deletion**

*Status: Complete*

A user has the right to request that we delete all of their personal data. Users who wish to inquire about the right to be forgotten will be able to reach out to us at any time just email us at [contact@laylo.com](mailto:contact@laylo.com)

## **Access / Portability**

*Status: Complete*

A user can request access to a copy of the personal data that we have collected. Users who wish to request portability can reach out to us at any time at [contact@laylo.com](mailto:contact@laylo.com)

## **Modification**

*Status: Complete*

In Laylo, if a user asks to change their information, we can do so within our admin portal. If a user has a modification to make, they can reach out to us at [contact@laylo.com](mailto:contact@laylo.com)

## **Data Protection Agreement**

*Status: In Progress*

We are creating a legal agreement that users and external parties can receive from us, promising the protection of all personally identifiable information that we collect and store.

## **Data Protection Agreement**

Within Section 7 of our DPA, we commit to displaying a list of all current sub-processors in use by Laylo. A sub-processor includes any third party that we share personally identifiable info with.

Here is that list: *AWS, Baremetrics, Bugsnag, Cloudflare, Facebook, Google, Hotjar, HelpScout, Homerun, Hubspot, Intercom, Looker, MongoDB, Atlas, Mailchimp, Mixpanel, Neo4J, NiceReply, Pusher, Qualaroo, Sendgrid, Smooch, Stripe, Twilio, Wootric.*

## **Cookie Statement**

Like many websites, we also use "cookie" technology to collect additional website usage data and to improve the Site and our Service. A cookie is a small data file that we transfer to your computer's hard disk. A session cookie enables certain features of the Site and our service and is deleted from your computer when you disconnect from or leave the Site. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to the Site. Persistent cookies can be removed by following your web browser help file directions. Most Internet browsers automatically accept cookies. Laylo may use both session cookies and persistent cookies to better understand how you interact with the Site and our Service, to monitor

aggregate usage by our users and web traffic routing on the Site, and to improve the Site and our Service.

We may also automatically record certain information from your device by using various types of technology, including “clear gifs” or “web beacons.” This automatically-collected information may include your IP address or other device address or ID, web browser and/or device type, the web pages or sites that you visit just before or just after you use the Service, the pages or other content you view or otherwise interact with on the Service, and the dates and times that you visit, access, or use the Service. We also may use these technologies to collect information regarding your interaction with email messages, such as whether you opened, clicked on, or forwarded a message, to the extent permitted under applicable law.

You can instruct your browser, by editing its options, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. Please note that if you delete, or choose not to accept, cookies from the Service, you may not be able to utilize the features of the Service to their fullest potential.

## **Frequently asked questions about GDPR and Laylo**

Q: As a social media marketer, how will the GDPR affect me?

A: If you are a business with customers in the EU, the GDPR will be applicable to you when you are handling the personal data of your EU customers. Check out [this blog post](#) about what it means for social media marketers. We hope you find it useful, but advise you to consult a legal advisor to ensure you are compliant.

Q: Does the GDPR change how I can use Laylo?

A: No. Laylo's features and functionality are unaffected by the GDPR.

Q: How does Laylo collect data—by e-mail, electronic forms, activity tracking, etc.?

A: We primarily collect data when a user sign-up for Laylo services.

## **Privacy Policy**

*Last updated: December 18, 2019*

Laylo provides this Privacy Policy to inform you of our policies and procedures regarding the collection, use, protection, and disclosure of Personal Information received from your use of this website, located at <https://laylo.com> ("Site"), applications, browser extensions, and other services provided by us (collectively, together with the Site, our "Service"), and in connection with our customer, vendor, and partner relationships. This Privacy Policy also tells you about your rights and choices with respect to your Personal Information, and how you can reach us to update your contact information or get answers to questions you may have about our privacy practices.

In addition to the activities described in this Privacy Policy, we may process Personal Information on behalf of our commercial customers when they use the Service. We process such Personal Information as a data processor of our commercial customers, which are the entities responsible for the data processing. To understand how a commercial customer processes your Personal Information, please refer to that customer's privacy policy.

Registration with, use of, and access to the Service is subject to this Privacy Policy and our Terms of Use located at <https://laylo.com/privacy>. All terms not defined in this Privacy Policy will have the meanings set forth in the Laylo Terms of Use

## **1. Personal information we may collect**

For the purpose of this Privacy Policy, “Personal Information” means any information relating to an identified or identifiable individual. We obtain Personal Information relating to you from various sources described below.

Where applicable, we indicate whether and why you must provide us with your Personal Information, as well as the consequences of failing to do so. If you do not provide Personal Information when requested, you may not be able to benefit from our Service if that information is necessary to provide you with the service or if we are legally required to collect it.

## **2. Personal information provided by you**

### **Registration**

If you desire to have access to certain restricted sections of the Site or request to receive marketing materials, you may be required to become a registered user, and to submit the following types of Personal Information to Laylo: your name, email address, phone number, full user name, password, city, and time zone.

Customer Support

We may collect information through your communications with our customer support team or other communications that you may send us and their contents.

### Making a Purchase

When you make payments through the Service, you will need to provide Personal Information such as your credit card number and billing address.

### Social Media

In order to allow you to post to your social media platforms, we may ask you to provide your username, account ids, social handle, timezones, and email address.

### Other

We may also collect your contact details when you provide them in the context of our customer, vendor, and partner relationships.

## **2a. Personal Information Collected from Connected Social Media**

### **Accounts**

If you connect your third party social media account to your Laylo account, we may collect certain information stored in your social media account such as:

#### Facebook

Laylo may allow you to connect a Facebook page or profile to your Laylo account, in which case we will access certain information from Facebook regarding your account. In particular, we may collect profile image, display name, username/page ID or profile ID, access tokens, sent posts. This includes the content of your post and engagement data (such as click rates, likes, re-shares, impressions, as well as general engagement counts), to the extent permitted by applicable law. This data will only be used by Laylo to provide you with the Service you expect and will not be shared with any third parties.

#### Twitter

Laylo may allow you to connect a Twitter profile to your Laylo account, in which case we will access certain information from Twitter regarding your account. In particular, we may collect profile image, display name, username/profile ID, access tokens, and sent posts. This includes the content of your post and engagement data (such as click rates, likes, retweets, re-shares, impressions, as well as general engagement counts), to the extent permitted by applicable law. This data will only be used by Laylo to provide you with the Service you expect and will not be shared with any third parties.

#### Instagram

Laylo may allow you to connect an Instagram profile to your Laylo account, in which case we will access certain information from Instagram regarding your account. In particular, we may collect profile image, display name, username/profile ID, access tokens, and sent posts. This includes the content of your post and engagement data

(such as click rates, likes, re-shares, impressions, as well as general engagement counts), to the extent permitted by applicable law.

### **Pinterest**

Laylo may allow you to connect a Pinterest page or profile to your Laylo account, in which case we will access certain information from Pinterest regarding your account. In particular, we may collect profile image, display name, username/profile ID, access tokens, sent posts, and profile boards. This includes the content of your post and engagement data (such as click rates, likes, re-shares, re-pins, impressions, as well as general engagement counts), to the extent permitted by applicable law.

### **LinkedIn**

Laylo may allow you to connect a LinkedIn profile to your Laylo account, in which case we will access certain information from LinkedIn regarding your account. In particular, we may collect profile image, display name, username/profile ID, access tokens, and sent posts. This includes the content of your post and engagement data (such as click rates, likes, re-shares, impressions, as well as general engagement counts), to the extent permitted by applicable law.

### **Google+**

Laylo may allow you to connect a Google+ page or profile to your Laylo account, in which case we will access certain information from Google regarding your account. In particular, we may collect profile image, display name, username/profile ID, access

tokens, and sent posts. This includes the content of your post and engagement data (such as click rates, likes, re-shares, impressions, as well as general engagement counts), to the extent permitted by applicable law.

Additionally, if you connect Twitter, Facebook, or Instagram when utilizing Laylo's messaging or response features, we may collect: profile image, display name, username/page ID, access tokens, sent or received comment text and sent or received private message text.

Additionally, if you connect Twitter, Facebook, or Instagram when utilizing Laylo Fanalytics we may collect: profile image, display name, username/handle, access tokens, social accounts insights data and social accounts demographic data, sent tweets, social account's followers count, social account's insights data and social account's audience data.

## **2b. Personal Information Automatically Obtained from Your Interactions with the Service**

### Log Data

When you use our Service, our servers automatically record information that your browser sends whenever you visit a website ("Log Data"). This Log Data may include information such as your IP address, browser type or the domain from which you are

visiting, the web-pages you visit, the search terms you use, and any advertisements on which you click.

### Cookies and Similar Technologies

Like many websites, we also use “cookie” technology to collect additional website usage data and to improve the Site and our Service. A cookie is a small data file that we transfer to your computer’s hard disk. A session cookie enables certain features of the Site and our service and is deleted from your computer when you disconnect from or leave the Site. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to the Site. Persistent cookies can be removed by following your web browser help file directions. Most Internet browsers automatically accept cookies. Laylo may use both session cookies and persistent cookies to better understand how you interact with the Site and our Service, to monitor aggregate usage by our users and web traffic routing on the Site, and to improve the Site and our Service.

We may also automatically record certain information from your device by using various types of technology, including “clear gifs” or “web beacons.” This automatically-collected information may include your IP address or other device address or ID, web browser and/or device type, the web pages or sites that you visit just before or just after you use the Service, the pages or other content you view or otherwise interact with on the Service, and the dates and times that you visit, access, or use the Service. We also may use these technologies to collect information regarding

your interaction with email messages, such as whether you opened, clicked on, or forwarded a message, to the extent permitted under applicable law.

You can instruct your browser, by editing its options, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. Please note that if you delete, or choose not to accept, cookies from the Service, you may not be able to utilize the features of the Service to their fullest potential.

### Do Not Track

Laylo does not process or respond to web browsers' "do not track" signals or other similar transmissions that indicate a request to disable online tracking of users who use our Service.

### Third-Party Web Beacons and Third Party Buttons

We may display third-party content on the Service, including third-party advertising.

Third-party content may use cookies, web beacons, or other mechanisms for obtaining data in connection with your viewing of the third party content on the Service.

Additionally, we may implement third party buttons, such as Facebook "share" buttons, that may function as web beacons even when you do not interact with the button.

Information collected through third-party web beacons and buttons is collected directly by these third parties, not by Laylo. Please consult such third party's data collection, use, and disclosure policies for more information.

### **Links to Other Websites**

Our Site contains links to other websites. The fact that we link to a website is not an endorsement, authorization or representation of our affiliation with that third party. We do not exercise control over third party websites. These other websites may place their own cookies or other files on your computer, collect data or solicit Personal Information from you. Other sites follow different rules regarding the use or disclosure of the Personal Information you submit to them. We are not responsible for the content, privacy and security practices, and policies of third-party sites or services to which links or access are provided through the Service. We encourage you to read the privacy policies or statements of the other websites you visit.

### **3. How we may use your personal information**

We may use the Personal Information we obtain about you to:

- create and manage your account, provide our Service, process payments, and respond to your inquiries;
- manage account authentication such as two-factor authentication
- communicate with you to verify your account and for informational and operational purposes, such as account management, customer service, or system maintenance, including by periodically emailing you service-related announcements;
- tailor our Service (e.g., we may use cookies and similar technologies to remember your preferences);

- publish your content, comments or messages on social media platforms;
- provide tailored advertising, for Laylo services, via Google AdWords;
- aggregate your Personal Information for analytical purposes;
- provide customer support;
- operate, evaluate and improve our business (including by developing new products and services; managing our communications; determining the effectiveness of our advertising; analyzing how the Service is being accessed and used; tracking the performance of the Service; debugging the Service; facilitating the use of our Service);
- send you marketing communications about products, services, offers, programs and promotions of Laylo, and affiliated companies;
- ensure the security of our Service;
- manage our customer, service provider, and partner relationships;
- enforce our agreements related to our Service and our other legal rights; and
- comply with applicable legal requirements, industry standards, and our policies.

If you are located in the European Economic Area, we may process your Personal Information for the above purposes when:

- you have consented to the use of your Personal Information, For example, we may seek to obtain your consent for our uses of cookies or similar technologies, or to send you marketing communications.

- we need your Personal Information to provide you with services and products requested by you, or to respond to your inquiries,
- we have a legal obligation to use your Personal Information, or
- we have a legitimate interest in using your Personal Information. In particular, we have a legitimate interest in using your Personal Information to ensure and improve the safety, security, and performance of our Service, to anonymize Personal Information and carry out data analyses.

#### **4. How we share personal information**

We may disclose the Personal Information we collect about you as described below or otherwise disclosed to you at the time the data is collected, including with:

##### Social Media Platforms

Our primary purpose for using information is to publish your content on social platforms, allow you to track metrics for analytical purposes, and engage with customers through public replies and conversations (direct messages or “DMs”). We may allow you to link your account on Laylo with an account on a third party social network platform, such as Twitter or Facebook, and to transfer your information to and from the applicable third party platform. Once you share your content to a social media platform, its use will be governed by that platform’s privacy policy.

##### Service Providers

We engage certain trusted third parties to perform functions and provide services to us, including hosting and maintenance, error monitoring, debugging, performance monitoring, billing, customer relationship, database storage and management, and direct marketing campaigns. We may share your Personal Information with these third parties, but only to the extent necessary to perform these functions and provide such services. We also require these third parties to maintain the privacy and security of the Personal Information they process on our behalf.

#### Compliance with Laws and Law Enforcement

Laylo cooperates with government and law enforcement officials or private parties to enforce and comply with the law. To the extent permitted under applicable law, we may disclose any information about you to government or law enforcement officials or private parties as we believe is necessary or appropriate to investigate, respond to, and defend against claims, for legal process (including subpoenas), to protect the property and rights of Laylo or a third party, to protect Laylo against liability, for the safety of the public or any person, to prevent or stop any illegal, unethical, fraudulent, abusive, or legally actionable activity, to protect the security or integrity of the Service and any equipment used to make the Service available, or to comply with the law.

#### Business Transfers

Laylo may sell, transfer or otherwise share some or all of its assets, including Personal Information, in connection with a merger, acquisition, reorganization, sale of assets, or similar transaction, or in the event of insolvency or bankruptcy. You will have the

opportunity to opt out of any such transfer if the new entity's planned processing of your information differs materially from that set forth in this Privacy Policy.

#### Other Third Parties

We may share Personal Information with our headquarters and affiliates, and business partners to whom it is reasonably necessary or desirable for us to disclose your data for the purposes described in this Privacy Policy. We may also make certain non-Personal Information available to third parties for various purposes, including for business or marketing purposes or to assist third parties in understanding our users' interest, habits, and usage patterns for certain programs, content, services, advertisements, promotions, and functionality available through the Service.

### **5. How we protect personal information**

Laylo is very concerned about safeguarding the confidentiality of your Personal Information. We employ administrative and electronic measures designed to appropriately protect your Personal Information against accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure or access, misuse, and any other unlawful form of processing of the Personal Information in our possession. Please be aware that no security measures are perfect or impenetrable. We cannot guarantee that information about you will not be accessed, viewed, disclosed, altered, or destroyed by breach of any of our administrative, physical, and electronic

safeguards, subject to requirements under applicable law to ensure or warrant information security.

We will make any legally-required disclosures of any breach of the security, confidentiality, or integrity of your unencrypted electronically stored Personal Information to you via email or conspicuous posting on our Site in the most expedient time possible and without unreasonable delay, consistent with (i) the legitimate needs of law enforcement or (ii) any measures necessary to determine the scope of the breach and restore the reasonable integrity of the data system , and any other disclosures that may be required under applicable law.

We also take measures to delete your Personal Information or keep it in a form that does not permit identifying you when this information is no longer necessary for the purposes for which we process it, unless we are required by law to keep this information for a longer period. When determining the retention period, we take into account various criteria, such as the type of products and services requested by or provided to you, the nature and length of our relationship with you, possible re-enrollment with our products or services, the impact on the services we provide to you if we delete some information from or about you, mandatory retention periods provided by law and the statute of limitations.

## **6. Your rights and choices**

If you decide at any time that you no longer wish to receive such marketing communications from us, please follow the unsubscribe instructions provided in any of the communications. You may also opt out from receiving commercial email from us by sending your request to us by email at [contact@laylo.com](mailto:contact@laylo.com). Please be aware that, even after you opt out from receiving commercial messages from us, you will continue to receive administrative messages from us regarding the Service.

In certain jurisdictions you have the right to request access and receive information about the Personal Information we maintain about you, to update and correct inaccuracies in your Personal Information, to restrict or object to the processing of your Personal Information, to have the information blocked, anonymized or deleted, as appropriate, or to exercise your right to data portability to transfer your Personal Information to another company. Those rights may be limited in some circumstances by local law requirements. In addition to the above-mentioned rights, you also have the right to lodge a complaint with a competent supervisory authority subject to applicable law.

Where required by law, we obtain your consent for the processing of certain Personal Information collected by cookies or similar technologies, or used to send you direct marketing communications, or when we carry out other processing activities for which consent may be required. If we rely on consent for the processing of your Personal Information, you have the right to withdraw it at any time and free of charge. When you do so, this will not affect the lawfulness of the processing before your consent withdrawal.

To update your preferences, ask us to remove your information from our mailing lists, delete your account or submit a request to exercise your rights under applicable law, please contact us as specified in the “How to Contact Us” section below.

## **7. Data transfers**

Laylo is based in the United States. Personal Information that we collect may be transferred to, and stored at, any of our affiliates, partners or service providers which may be inside or outside the European Economic Area (“EEA”) and Switzerland, including the United States. By submitting your personal data, you agree to such transfers. Your Personal Information may be transferred to countries that do not have the same data protection laws as the country in which you initially provided the information. When we transfer or disclose your Personal Information to other countries, we will protect that information as described in this Privacy Policy.

## **8. Children's privacy**

The Site is not directed to persons under 16. If a parent or guardian becomes aware that his or her child has provided us with Personal Information without their consent, he or she should contact us at [contact@laylo.com](mailto:contact@laylo.com). We do not knowingly collect Personal

Information from children under 16. If we become aware that a child under 16 has provided us with Personal Information, we will delete such information from our files.

## **9. Updates to this Privacy Policy**

This Privacy Policy may be updated from time to time for any reason; each version will apply to information collected while it was in place. We will notify you of any modifications to our Privacy Policy by posting the new Privacy Policy on our Site and indicating the date of the latest revision. You are advised to consult this Privacy Policy regularly for any changes.

In the event that the modifications materially alter your rights or obligations hereunder, we will make reasonable efforts to notify you of the change. For example, we may send a message to your email address or generate a pop-up or similar notification when you access the Service for the first time after such material changes are made. Your continued use of the Service after the revised Privacy Policy has become effective indicates that you have read, understood and agreed to the current version of this Privacy Policy.

## **10. Your California privacy rights**

Residents of California have the right to request a disclosure describing what types of personal information we have shared with third parties for their direct marketing

purposes, and with whom we have shared it, during the preceding year. You may request a copy of that disclosure by contacting us at [contact@laylo.com](mailto:contact@laylo.com).

## **11. How to contact us**

Laylo Inc. is the entity responsible for the processing of your Personal Information. If you have any questions or comments regarding this Privacy Policy, or if you would like to exercise your rights to your Personal Information, you may contact us by emailing us at [contact@laylo.com](mailto:contact@laylo.com) or by writing to us at:

Laylo, Inc

9200 Sunset Boulevard, Suite 1201

West Hollywood, CA 90069

This Privacy Policy is effective as of December 19, 2019.

If you have any thoughts or questions about this Privacy Policy please email us at [contact@laylo.com](mailto:contact@laylo.com).