

Privacy Policy

(For EEA and UK Users)

RevComm Inc. (“RevComm,” “we,” “our,” and/or “us”) values the privacy of individuals who use our websites (<https://www.revcomm.co.jp/>) (<https://www.miitel.com/>) (the “Site”) and our Platform (defined below and, together with the “Site,” our “Services”).

This privacy policy (the “Privacy Policy”) explains how we collect, use, and share information from users of our Services (“you” and/or “your”).

As used in the Privacy Policy, “Platform” means our (i) proprietary web-based application that has been programmed to help end-users visualize and analyze telephone sales and customer service calls (“MiiTel”) and (ii) proprietary Zoom integration that has been programmed to help end users visualize and analyze meetings that take place over Zoom (“MiiTel for Zoom”) provided by RevComm.

The Privacy Policy only applies to our processing of your personal data if you are located in the EEA or the UK. To the extent of any conflict between the Privacy Policy and any of our other terms or policies, the provisions of the Privacy Policy shall prevail.

For any information we receive in relation to other services provided by RevComm, “[RevComm T&Cs of Use](#)” and “[Privacy Policy](#)” shall apply. Beyond the Privacy Policy, your use of our Services is also subject to our [MiiTel T&Cs of Use](#) ,

1. Information We Collect.

Depending on the Services you use, we may collect a variety of information from or about you or your devices from various sources, as described below.

A. Information You Provide to Us.

- **Registration and Account Information.**

When you sign up for a business account, register to use our Services, sign up for demos or updates, or participate in our surveys, we may ask you for your name, title, company name, email address, location, phone number, and account or username.

We may also ask you for information about your company and personnel, such as the names and email addresses of officers, directors, employees who you authorize to use our Services and other information that we and our service providers may require to integrate your company’s business information with our Services.

- **Communications.**

If you contact us directly, we will receive information about you. For example, when you contact our customer support team, we will receive your name, email address, the contents of a message or attachment that you may send to us, and other information you choose to provide.

When we send you emails, we may track whether you open them to learn how to deliver a better customer experience and improve our Services.

- **Payment Information.**

If you make a purchase through our Services, your payment-related information, such as credit card or other financial information, is collected by our third-party payment processor on our behalf.

B. Information We Collect When You Use Our Services.

- **Location Information.**

When you use the Platform, we may receive IP-based location information from your devices (depending on their settings) to provide support services.

- **Device Information.**

We receive information about the device and software you use to access our Services, including IP address, web browser type, operating system version, phone carrier and manufacturer, application installations, device identifiers, and other similar device information.

- **Usage Information.**

To help us understand how you use our Services and to help us improve them, we automatically receive information about your interaction with our Services, like the pages or other content you view, clicks or other interactions and activities on the Services, any content you post, and the dates and times of your visits.

- **Telephone Call and Meeting Data.**

Our data analytics tools and capabilities enable our users of Platform (“Business Customers”) to analyze and share the contents of their telephone calls and meetings (“Digital Conferences”) that take place through our tools or third-party services such as Zoom.

Through voice activity detection tools and other similar technologies, we enable Business Customers to analyze their Digital Conferences through automatic audio transcription and speech analysis (e.g., detection of content, inflection, speed, emotion).

To do so, we collect and process the contents of our Business Customers’ Digital Conferences, including the conferences’ audio, video, images, text-based communications, associated data and documentation, as well as information that directly identifies conference participants, such as names, titles, and contact information.

Business Customers with appropriate account credentials may record Digital Conferences in which you participate through third-party services and are responsible for obtaining any required consents under applicable laws.

- **Your Contacts.**

You may choose to give us access to additional user contacts to make it easy for you to do things like share and collaborate, send messages, and invite others to use the Services. If you do, we may store those contacts within our systems for you to use.

- **Information from Cookies and Similar Technologies.**

We and our third-party partners collect information using cookies, pixel tags, or similar technologies. Our third-party partners, such as analytics and advertising partners, may use these technologies to collect information about your online activities over time and across different services.

Cookies are small text files containing a string of alphanumeric characters.

We may use both session cookies and persistent cookies.

A session cookie disappears after you close your browser.

A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to our Services.

Please review your web browser’s “Help” file to learn the proper way to modify your cookie settings.

Please note that if you delete or choose not to accept cookies from the Services, you may not be able to utilize the features of the Services to their fullest potential.

- **User Interactions.**

Our Services may allow you to comment on a Digital Conference or otherwise share the conference or excerpts thereof with others.

We also may collect information about your interactions with other users.

C. Information We Receive From Third Parties.

We may receive additional information about you, such as contact information, from third parties (e.g., data or marketing partners or referral agencies) and other publicly available sources where applicable and combine it with other information we have about you.

2. How We Use the Information We Collect.

We use the information we collect as follows:

Purpose/Activity	Lawful Basis
To provide, maintain, improve, and enhance our Services	Necessary for our legitimate interests (to conduct our business)
To analyze voice data for the provision of our Services	Necessary for the performance of a contract or to take steps at the request of the data subject prior to entering into a contract Necessary for our legitimate interests (to conduct our business)
To personalize your experience regarding our Services such as by providing tailored content and recommendations	Necessary for the performance of a contract or to take steps at the request of the data subject prior to entering into a contract Necessary for our legitimate interests (to conduct our business)
To understand and analyze how you use our Services and develop new products, services, features, and functionality	Necessary for the performance of a contract or to take steps at the request of the data subject prior to entering into a contract Necessary for our legitimate interests (to develop and grow our business)
To communicate with you, provide you with updates and other information relating to our Services, provide information that you request, respond to comments and questions, and otherwise provide customer support	Necessary for the performance of a contract or to take steps at the request of the data subject prior to entering into a contract Necessary for our legitimate interests (to conduct our business)
For marketing and advertising purposes, such as developing and providing promotional and advertising materials that may be relevant, valuable or otherwise of interest to you	Necessary for our legitimate interests (to conduct our marketing activities) Your consent (where relevant)
To generate aggregated data that we may use to publish reports based on information collected from use of our Services	Necessary for the performance of a contract or to take steps at the request of the data subject prior to entering into a contract Necessary for our legitimate interests (to develop and grow our business)
To facilitate transactions and payments	Necessary for the performance of a contract or to take steps at the request of the data subject prior to entering into a contract

	Necessary for our legitimate interests (to conduct our business)
To find and prevent fraud, and respond to trust and safety issues that may arise	Necessary for our legitimate interests (to conduct our business)
For compliance purposes, including enforcing our Terms of Service or other legal rights, or as may be required by applicable laws and regulations or request by any judicial process or governmental agency	Necessary for compliance with a legal obligation
For other purposes for which we provide specific notice at the time the information is collected	Necessary for the performance of a contract or to take steps at the request of the data subject prior to entering into a contract Necessary for our legitimate interests (to conduct our business)

3. How We Share the Information We Collect with our Affiliates.

We may share any information we receive with our affiliates for any of the purposes described in the Privacy Policy.

As used in the Privacy Policy, “affiliate” means any entity that directly or indirectly controls, is controlled by, or is under common control with the subject entity, and “control” means direct or indirect ownership or control of more than or equal to 20% of the voting interests of the subject entity.

Vendors and Service Providers.

We may share any information we receive with vendors and service providers retained in connection with the provision of our Services.

Profiles and User Content.

Our Services enable you to collaborate with your business team through comments, and other similar features.

Your name, team name, email address, other profile information, as well as the content you post to the Services will be displayed on the Services and viewable by default to other authorized users, such as other members of your team or organization.

Analytics Partners.

We use analytics services such as Google Analytics to collect and process certain analytics data from the Site. These services may also collect information about your use of other websites, apps, and online resources.

You can learn more about Google’s practices by visiting <https://www.google.com/policies/privacy/partners/>.

As Required By Law and Similar Disclosures.

We may access, preserve, and disclose your information if we believe doing so is required or appropriate to: (a) comply with law enforcement requests and legal process, such as a court order or subpoena; (b) respond to your requests; or (c) protect your, our, or others’ rights, property, or safety. For the avoidance of doubt, the disclosure of your information may occur if you post any objectionable content on or through the Services.

Merger, Sale, or Other Asset Transfers.

We may transfer your information to service providers, advisors, potential transactional partners, or other third parties (including our affiliates) in connection with the consideration, negotiation, or completion of an establishment of our new affiliate or a corporate transaction in which we are acquired by or merged with another company or we sell, liquidate, or transfer all or a portion of our assets.

The use of your information following any of these events will be governed by the provisions of the Privacy Policy in effect at the time the applicable information was collected.

Consent.

We may also disclose your information with your permission.

4. International Data Transfer

We may transfer your personal data to countries/territories outside the EEA/UK, where the third parties listed in “**3. How We Share the Information We Collect with our Affiliates.**” above are located, including Japan, the US and Indonesia.

When we transfer personal data to countries that are not deemed by the EEA and/or the UK to provide an adequate level of data protection, we will protect your personal data through appropriate safeguards based on: the European Commission’s Standard contractual clauses ([EU SCC](#)) for the EU, the International Data Transfer Agreement ([IDTA](#)) or the International Data Transfer Addendum to the EU SCC ([Addendum](#)) for the UK.

For further information, including obtaining a copy of the documents used to protect your personal data, please contact us by email as per the information in “**14 Contact Information**”.

5. Data Retention.

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, as well as the applicable legal, regulatory, tax, accounting or other requirements.

6. Your Rights.

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data.

Right of Access.

Subject to certain exceptions, you have the right to obtain a confirmation as to whether or not we process your personal data, and if we do, request access to your data.

Right of Rectification.

If the personal data that we process is incomplete or incorrect, you have the right to request its completion or correction at any time.

Right to Deletion.

Subject to certain exceptions, if you consider that we should stop processing some or all of your personal data, you have the right to request its deletion. However, there may be legitimate reasons why an immediate deletion may not be possible (such as where retention is required to meet legal or regulatory obligations).

Right to Restrict Processing.

You have the right to request that we restrict the processing of your personal data.

Right to Complain to a Supervisory Authority.

You have the right to lodge a complaint with a supervisory authority, in particular in the member states of the EEA or the UK where you have a habitual residence or place of work or where the alleged infringement of the GDPR took place.

Right to Data Portability.

Where the processing of your personal data takes place on the basis of your consent or a contract, and is carried out by automated means, you have the right to request that we provide your personal data to you in a machine-readable format.

Right to Withdraw your Consent.

If your personal data is processed on the basis of your consent, you have the right to withdraw your consent at any time. The withdrawal of your consent does not affect the lawfulness of processing of your personal data based on your consent before its withdrawal.

7. Mandatory Personal Data.

Personal data that is mandatory to be provided is indicated in the relevant forms that you complete. In cases where the provision of personal data is mandatory, we are not able to provide our products and/or the Services to you if the relevant information is not provided.

8. Your Choices regarding Marketing Communications.

You can unsubscribe from our promotional emails via the link provided in the emails.

Even if you opt out of receiving promotional messages from us, you will continue to receive administrative messages from us.

9. Third Party Websites and Services.

Our Services may contain links to other websites, products, or services that we do not own or operate. We are not responsible for the privacy practices of these third parties.

Please be aware that the Privacy Policy does not apply to your activities regarding these third-party services or any information you disclose to these third parties.

We encourage you to read such third-parties' privacy policies before providing any information to them.

10. Security.

We make reasonable efforts to protect your information by using safeguards designed to improve the security of the information we maintain.

However, as no electronic transmission or storage of information can be entirely secure, we can make no guarantees as to the security or privacy of your information.

11. Children's Privacy.

We do not knowingly collect, maintain, or use personal information from children under 16 years of age, and no part of our Services is directed to children.

If you learn that a child has provided us with personal information in violation of the Privacy Policy, then you may alert us at privacy@revcomm.co.jp

12. UpdatingYour Information.

Users with administrative permissions may change user settings and update account information through the profile settings.

13. Changes to the Privacy Policy.

We will post any adjustments to the Privacy Policy on this page, and the revised version will be effective when it is posted.

If we materially change the ways in which we use or share personal information previously collected from you through the Services, we will notify you through the Services, by email or other communication.

14. Contact Information.

If you have any questions, or concerns about our processing activities, please email us at privacy@revcomm.co.jp

Enacted: February 1, 2024