

Privacy Policy

Last Modified: 17 September 2021

About this Privacy Policy

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

*By “**Aircall**” we mean, depending on the context, the Aircall group of companies comprising entities listed in Section 12 of this Privacy Policy or a particular entity from the said list. Different entities in Aircall group may have different roles in your Personal Data processing depending, above all, on your location. An explanation on which are the roles of the Aircall’s entities in using your Personal Data is provided in the respective chapters hereof.*

*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 Aircall 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.*

Aircall uses your Personal Data as a Data Controller - on its own behalf - in the following situations:

- If you use Aircall product and Services that require an Aircall account (we further call you “**Aircall User**”), Aircall will process some of your Personal Data as a Data Controller under certain circumstances described below. An Aircall User is typically a representative or an employee of Aircall’s Customer or of a prospect (a company that is about to become Aircall’s Customer) who acts as our Customer’s agent. If you are an Aircall User, Sections 1 and 4-11 apply to Aircall’s processing of your Personal Data. Also, Aircall 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 Aircall Customer – the Data Controller.
- You simply visit the **Site** (we further call you “**Site Visitor**”) - without being logged into your Aircall account, in case you are also an Aircall User. If you are a Site Visitor, Sections 2 and 4-11 apply to Aircall’s processing of your Personal Data.
- You showed interest in Aircall's product or services and agreed to be listed as a contact in our marketing database (we further call you a "Lead"). If you are a Lead, Sections 3 and 4-11 apply to Aircall’s processing of your Personal Data.

*By “**Site**” we mean Aircall’s website: <https://aircall.io>.*

Aircall 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 Aircall's usage of your Personal Data. Aircall 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 Aircall'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 Aircall's **Terms of Use**.

*By “**Terms of Use**” we mean Aircall Terms of Use which appear at <https://aircall.io/terms-of-use/sas/> for the European version and at <https://aircall.io/terms-of-use/inc/> for the North American (US & Canada) version.*

If this Privacy Policy does not answer all your questions or concerns, you may also consult our [Privacy FAQs](#).

1. Aircall User's Personal Data Processing

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

The table below indicates the different purposes your Personal Data, as an Aircall User, may be processed by Aircall 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, Aircall may also process personal data as required by applicable law.

Purpose and included processing activities	Categories of Personal Data	Legal basis	Categories of Recipients <i>See also Section 3 for other recipients</i>	Retention
<p>Management of customer accounts, incl. ensuring customer experience</p> <p><i>Analytics of user behaviour within the Aircall product.</i></p> <p><i>Analysis (manual) of customer usage of Aircall product and communication with the customer by Success Managers.</i></p>	<p>Customer's account data</p> <p>Customer's financial/payment data Call data - other (notes, tags, insight cards)</p> <p>Information about agent</p> <p>Customer's contact data (from contact list)</p> <p>- Customer's account data</p> <p>- Customer's financial/payment data</p> <p>- Call data - other (notes, tags, insight cards)</p>	<p>Processing is necessary for legitimate interests pursued by Aircall (<i>To provide Aircall Services to Customers, to enhance user experience, to improve, develop and administer Aircall products and services</i>).</p>	<p>Hosting provider</p> <p>Providers of infrastructure services</p> <p>CRM providers</p> <p>Telecommunication carriers and operators</p>	<p>Duration of relationship with the Customer</p>

<p>Processing customer's requests</p> <p><i>Coordinating and analyzing requests submitted by Customers and Aircall Users via Customer Support Portal on Aircall's website.</i></p>	<p>Customer's account data</p> <p>Customer's financial/payment data</p> <p>Information about agent</p> <p>Customer's contact data (from contact list)</p> <p>Call/SMS metadata</p> <p>Call data - other (notes, tags, insight cards)</p>	<p>Processing is necessary for legitimate interests pursued by Aircall (<i>To provide Aircall Services to Customers, to enhance user experience, to improve, develop and administer Aircall products and services</i>).</p>	<p>Hosting provider</p> <p>Providers of ticketing solutions</p>	<p>Up to 3 years following the request</p>
<p>Protection of security and integrity of Aircall's systems and infrastructure</p> <p><i>Analyzing usage, access, and other metrics across Aircall systems; implementing proactive and reactive security measures</i></p>	<p>Customer's account data</p> <p>Information about agent</p> <p>Customer's contact data (from contact list)</p> <p>Call/SMS metadata</p>	<p>Processing is necessary for legitimate interests pursued by Aircall (<i>To provide Aircall Services securely, as contracted between Aircall and its Customers</i>).</p>	<p>Hosting provider</p> <p>Providers of infrastructure services</p>	<p>Duration of relationship with the Customer</p>

	Call data - other (notes, tags, insight cards)			
Invoicing <i>Preparation of invoice based on customer's usage of the Aircall product.</i>	Call/SMS metadata Customer's account data	Processing is necessary for legitimate interests pursued by Aircall (<i>To be able to bill Aircall Services based on usage of Aircall services, as contracted between Aircall and the Customer</i>).	Providers of billing management tools	Up to 1 month following the call is made or SMS is sent
Cash collection <i>Administration of billing and cash collection, including handling requests from customers regarding payments and invoices and any other billing related requests.</i>	Customer's account data Customer's financial/payment data	Processing is necessary for legitimate interests pursued by Aircall (<i>To be able to claim payment of outstanding invoices</i>).	Providers of billing management tools Providers of payment solutions	Up to 6 month following invoice is sent to customer
Protection of Aircall's rights and interests <i>Personal data storage for potential disputes, claim, question or disagreement and its potential usage in case that dispute, claim, question or disagreement arises.</i>	Customer's account data Information about agent Call data - other (notes, tags, insight cards) Call/SMS metadata	Processing is necessary for legitimate interests pursued by Aircall (<i>To be able to initiate or respond to claims and questions</i>).	None.	Up to 1 year following termination of relationship with the Customer

<p>Responding to access requests from law enforcing authorities under applicable telecommunications law</p> <p><i>As a telecommunications service provider, Aircall 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.</i></p>	<p>Call/SMS metadata</p>	<p>Processing is necessary for compliance with legal obligations to which Aircall is subject.</p>	<p>None.</p>	<p>As required by applicable law - retention periods ranging from 1 to 6 years</p>
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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 Aircall.

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 Aircall SAS, the identity and the contact details of Aircall SAS can be found in Section 12 hereof.




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

The cookies used by the Site are the following:

Identification of the cookie	Purpose	Nature	Opt-out
Google Ad Service	Retargeting ads	Advertising	
Google Analytics	Use of the Site	Performance	
Google Tag Manager	Use of the Site	Performance	
Intercom	Live chat	Functionality	
Pardot	Retargeting emails	Marketing	
Wistia	Use of Our Videos	Performance	
Zarget	A/B testing	Performance	

Facebook	Retargeting ads	Advertising	
Amplitude	Use of the Site	Performance	
Stripe	Payment	Fraud detection	

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 Aircall 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 Aircall. These cookies are subject to such third parties’ privacy policies.

The 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, such as the

TarteAuCitron or TagCommander software. A list of additional software is also available on the French data protection authority ([CNIL](#)) website.

“CNIL” stands for Commission nationale de l'informatique et des libertés the French national data protection authority.

3. Lead’s Personal Data Processing - Sales and Marketing

Who is the Data Controller? When we conduct our email marketing campaigns and outbound sales development activities (email and calling), as described in this chapter, all Aircall companies typically participate in them and act as [Joint Controllers](#).

By “Joint Controllers” we mean those Aircall companies that jointly determine the purposes and means of the processing of your personal data and thus are generally jointly responsible, under the data protection laws, for the legality of the usage of your personal data.

Our email communication will always include identification of Aircall company leading our marketing activity in your region (Aircall SAS in Europe, Middle East and Asia; Aircall.io, Inc. in North America; and Aircall PTY LTD in Australia). Other Aircall companies may participate, based on internal agreement between them, in the Processing of your Personal Data within our

email marketing campaigns and outbound sales development activities as follows:

- Aircall companies participate in creation of the email communication content and design;
- Aircall companies share the touchpoint for requests and complaints regarding the Processing of your Personal Data in relation to Aircall's outbound sales development and marketing activities, whereby your requests and complaints are typically handled by Aircall SAS;
- Aircall companies jointly administer and share database used for Aircall's outbound sales development and marketing purposes; and
- Each Aircall company may enter into agreement with Aircall's business partner to enrich the shared database.

How do we collect your Personal Data? If we contact you with an email marketing campaign and/or as a part of our outbound sales development activities, it means we have your contact details listed in our database for these purposes. We collect contact details for our database from the following sources:

- Aircall's internal customer database - If you are Aircall's customer, we automatically add you to our database for email marketing communication, as we believe that you are interested in news about Aircall's product, services, events and other content.
- Forms on Aircall's Site - You have the option to sign up for our email marketing campaigns and outbound sales development activities via various forms on Aircall's Site, including when you register for a webinar or event hosted by Aircall or where Aircall participates, and including via support chat bot on the Site.

- Social networks - We may find your contact on a work-related social network, such as LinkedIn.
- Campaigns co-organized by Aircall - We also receive your contact in case you participate in a marketing campaign co-organized by Aircall and its business partner.
- Data enrichment tools and providers - Where local data protection laws allow and where we find a reliable provider of a data enrichment tool and we may also receive some of your contact details from these providers. Every provider used by Aircall for this purpose is subject to Aircall's privacy team assessment to make sure we collect your data ethically and in compliance with applicable laws.

What should you do if you want us to stop contacting you as a Lead?

You can find an "Unsubscribe" link in every email marketing communication sent by Aircall. Using this link is a reliable way to make sure we do not contact you with marketing emails anymore. Please note that it may take us up to 3 working days to process your "Unsubscribe" choice, whereas in the meantime you may receive other marketing emails from us. Thank you for understanding.

If we call you as a part of Aircall's outbound sales development activities, you can at any time inform our outbound sales representative that you do not wish to be contacted in this way anymore. We will make sure not to call you again.

Which Personal Data do we use? When we process your data as a Lead, we use, all or just certain, depending on your particular case, of the following Personal Data about you: name, email, phone number, company and job title, region/country, IP address. We also use certain data about your company, such as company size, CRM and the information on whether your company is an Aircall customer or not (use case).

How do we use your Personal Data? The table below indicates the different purposes your Personal Data, as a Lead, may be processed for by Aircall, 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).

Purpose and included processing activities	Legal basis	Categories of Recipients <i>See also Section 4 for other recipients</i>	Retention
<p>Conducting email marketing campaigns for promotion of brand awareness</p> <p><i>We send emails with varied promotional content related to Aircall's product and services, such as new features, integration partnerships. We may also ask you to fill out a survey questionnaire.</i></p> <p><i>You may also receive an invitation to an event, such as a webinar hosted by Aircall or where Aircall participates.</i></p> <p><i>Our emails may also introduce to you and promote content created by Aircall (exclusively or in cooperation with its partners), such as guides or e-books.</i></p> <p><i>Digital marketing - utilizes internet and online based digital technologies such as desktop computers, mobile phones and other digital media and platforms to promote products and services of the company.</i></p>	<p>To the extent that our activities are regulated by EU laws (typically if you are an EU resident) and if you are Aircall's customer, we have a legitimate interest to contact you within our email marketing campaigns. We have a strong belief that you want to be informed about news related to our product and services, as you already benefit from them.</p> <p>However, if you are not Aircall's customer, we are typically required by applicable law (such as ePrivacy Directive and derived national laws) to rely on your consent. Thus we only contact you via email if you give us such consent (opt-in).</p>	<p>CRM providers</p> <p>Providers of marketing management tools</p> <p>Aircall's marketing partners</p> <p>Providers of ticketing solutions</p>	<p>3 years after you give us your consent (if you are not Aircall's customer)</p> <p>or</p> <p>1 year following the termination of customer relationship (if you are/were Aircall's customer)</p>
<p>Outbound sales development</p> <p><i>If we believe that Aircall's product and services may suit the needs of your company, our outbound sales representative may email you and/or call you to introduce and discuss with you our product.</i></p>	<p>We have a legitimate interest to contact you within our outbound sales development activities. These activities are a form of direct marketing, where we carefully choose whether we will contact you or not by assessing potential benefits of Aircall's product and</p>	<p>CRM providers</p> <p>Providers of marketing management tools</p>	<p>3 years after you give us your consent</p>

	services for your company. We have a strong belief that your company may benefit from our communication.		
<p>Improving Aircall product, services and marketing activities</p> <p><i>We perform internal data analysis in order to have better overall information (aggregate statistics) about our customers and Leads and a better understanding of the market, and thus be able to better address their needs.</i></p>	We have a legitimate Interest to perform the internal analysis. We have a strong belief that if we are able to better target our communication and suit our product and services to your needs, you will ultimately benefit from them even more.	N/A	As long as we process your Personal Data for Conducting email marketing campaigns for promotion of brand awareness or Outbound sales development

Please note that not all categories of data recipients necessarily apply to you, depending mostly on how we collect your Personal Data as a Lead (i.e. Aircall's provider of ticketing system will only receive your Personal Data in case you sign up for our marketing activities via chat bot on our Site).

4. Other recipients of the collected Personal Data

Only our personnel, 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.

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

Aircall transfers Personal Data to countries located outside the European Economic Area, Switzerland or the United Kingdom (collectively, “Europe”), namely to the United States.

Personal Data can also be processed by mere access by individuals working outside Europe who work for us or for one of our trusted service providers (Data Processors).

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.

Aircall 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 Aircall 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 Aircall User, please see our Information Security FAQs [here](#) for more information about how your personal data is protected when you use the Aircall product.

9. Your rights and choices

In any case where Aircall 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.

Depending on where you are located, you may have additional rights related to calls or other communications you place or receive using Aircall services. Note that in the United States, only Aircall Customers – and not Aircall End Users – are entitled to invoke or waive restrictions that apply to Aircall’s use and disclosure of customer proprietary network information under 47 U.S.C. § 222.

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, be it your local authority or the CNIL. Without prejudice to your said right, we invite you to first seek an amicable resolution

thereof by contacting Aircall 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 a 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 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, or if you want to share your concerns about our processing of your Personal Data, please contact us by email at privacy@aircall.io.

You may also reach out to us via mail.

12. Aircall entities

Aircall.io, Inc., a Delaware corporation with offices at 381 Park Ave South, Floor 16, New York, NY 10016

Aircall SAS, a French société par actions simplifiée whose registered office is at 11-15, rue Saint Georges, 75009 Paris (France), registered with the Paris Registre du Commerce et des Sociétés under No. 807 437 595

Aircall Telecom SL, a Spanish sociedad limitada whose registered office is at CL MONTE ESQUINZA No 30 PISO BJ, PTA IZ, 28010 Madrid (Spain), NIF: B88625694

Aircall PTY LTD, an Australian proprietary limited company whose registered office is at LEVEL 22 19 MARTIN PLACE SYDNEY NSW 2000 (Australia), ABN: 33 646 704 314