

# Privacy Policy of Narayana OÜ

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Registration No. 12779661

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## 0. Introduction

This Privacy Policy outlines how Narayana OÜ ("the Company") handles and protects the personal data collected from users ("you" or "users") of our VoIP services. As a privacy-focused company, we prioritize the protection of your personal information and adhere to the requirements of the General Data Protection Regulation (GDPR) and other applicable data protection laws.

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## 1. Data Collection

### 1.1 Personal Data

Narayana OÜ collects and processes only the necessary personal data for providing and improving our VoIP services. We do not require personal information such as email addresses, names/surnames, as they are not obligatory to be a user of our VOIP services. We do not collect or store IP, UserAgent and other meta-information might be used for user identification. We also do not take clients' phone numbers because we sell phone numbers to clients as a VOIP provider. We do not use any of 3rd party services and their cookies to track users, make UX analytics, or for marketing reasons.

### 1.2 Session Cookies

When you access our website or use our VoIP services, we may collect session cookies to ensure the functionality and security of our services. These cookies do not contain any personal information and are automatically wiped after your session ends.

### 1.3 Company Information and Billing Information

To facilitate invoice issuance and billing, we collect and store the name of your company and its credentials. This information is necessary for legitimate business purposes and compliance with legal obligations.

### 1.4 Optional Billing Information

For some payment methods you could provide Email, Full name, billing address, and bank account. It's stored and used for billing purposes and invoicing. Anyway, it's not required and

is optional.

## **1.5 Delivery Address**

For physical items delivery (SIM cards, etc.) we might ask for a delivery address. It's used for delivery only and will not be stored.

## **1.6 Technical Data**

We gather logs that describe VOIP connection telemetry, not VOIP data. These logs are erased every 180 days.

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# **2. Data Usage and Purpose**

## **2.1 Provision of VoIP Services**

The personal data we collect is used solely to provide you with reliable and secure VoIP services. This includes facilitating communication, delivering invoices, and ensuring proper service functionality.

## **2.2 Legal Basis**

Our processing of your data is based on your consent (for session cookies) and the necessity of processing for the performance of a billing (for company information required for invoice issuance).

## **2.3 Data Retention**

We retain your data only for as long as necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required by law.

## **2.4 Inactive Accounts**

In case your account is not active anymore, the personal data will not be stored longer than 1 year from the moment of its last activation.

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# **3. Data Sharing and Disclosure**

## **3.1 Third-Party Service Providers**

Narayana OÜ may engage trusted third-party service providers to assist in the delivery of our services, such as payment processors. These service providers are contractually bound to process personal data only following our instructions and for the purposes specified in this Privacy Policy.

## **3.2 Legal Compliance**

We may disclose your data if required by law, regulation, or a legitimate request from a competent authority.

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# **4. Data Security**

## **4.1 Security Measures**

Narayana OÜ implements appropriate technical and organizational measures to protect your data from unauthorized access, disclosure, alteration, or destruction. We implement the privacy first architecture of our infrastructure, where the website narayana.im is just an API client for billing. The same access to features and billing functionality a client could implement in his own software, using documented API methods.

We regularly review and enhance our security practices to maintain a high level of data protection. We are hiring external auditors to ensure our infrastructure is secure.

## **4.2 Data Transfer**

We do not transfer or store your data on servers located outside the European Economic Area (EEA). We ensure that appropriate safeguards are in place to protect your data under the GDPR.

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# **5. Your Rights**

## **5.1 Data Subject Rights**

As a user, you have certain rights under the GDPR, including the right to access, rectify, erase, restrict processing, object to processing, data portability, and the right not to be subject to automated decision-making.

## **5.2 Exercising Your Rights**

To exercise your rights or make inquiries regarding your personal data, please contact us using the contact details provided at the end of this Privacy Policy. We will respond to your

request under applicable data protection laws.

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

### **6.1 Policy Changes**

Narayana OÜ reserves the right to update or modify this Privacy Policy at any time. We encourage you to review this policy periodically for any changes. Significant updates will be communicated through appropriate channels.

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## **7. Contact Information**

If you have any questions, concerns, or requests regarding this Privacy Policy or the handling of your personal data by Narayana OÜ, please contact us using the following information:

Data Controller: Narayana OÜ

Address: Estonia, Harju maakond, Tallinn, Väike-Paala tn 2, 11415

Email: [support@narayana.im](mailto:support@narayana.im)

Phone: +3724444000

We take privacy matters seriously and will make reasonable efforts to address and resolve any concerns or inquiries you may have.

By using our VoIP services or accessing our website, you acknowledge that you have read and understood this Privacy Policy and agree to the collection, processing, and use of your personal data as described herein.

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Effective Date: 05/21/2023

Thank you for choosing Narayana OÜ as your VoIP service provider. We are committed to protecting your privacy and providing services with a focus on security and an intentional willingness not to gather any unnecessary data.

Signed digitally,  
Narayana OÜ