



PRIVACY POLICY

(last updated: 01-Apr-21)

OUR COMMITMENT TO PRIVACY

NetAlly LLC, and other entities that are controlled by or under common control with NetAlly (collectively, “NetAlly”, “We”, “Us”, or “Our”) is committed to respecting your privacy. This Privacy Policy describes how information that NetAlly collects through www.netally.com or other domains managed directly or indirectly by NetAlly (collectively, the “Site”) as well as through NetAlly’s devices, software and services (collectively, “Product(s)”) is issued, disclosed, stored and/or otherwise processed by NetAlly.

This Privacy Policy applies to Personal Information and Non-Personal Information (as defined below) that NetAlly collects, including but not limited to when you:

- use the Site or Our Products;
- request quotes, services, support, downloads, trials, whitepapers, or information;
- use NetAlly products and services under the purview of a written agreement between you and NetAlly; or
- subscribe to newsletters, programs, promotional emails, or other materials, or sign up or register to participate in certain online or offline events.

We may change this Privacy Policy from time to time. If We make changes, We will revise the “Last Updated” date at the top of this Privacy Policy. We encourage you to review this Privacy Policy to stay informed about Our Personal Information handling practices and your rights regarding your information.

PERSONAL V. NON-PERSONAL INFORMATION

“Personal Information” means any information relating to an identified or identifiable natural person, such as an identification number, physical, physiological, mental, economic, cultural, or social identifiers.

“Non-Personal Information” means information related to you but that does not personally identify you. Non-personal Information also includes information that could personally identify you in its original form, but that We have modified (for instance, by aggregating, anonymizing or de-identifying such information) in order to remove or hide any Personal Information.

COLLECTION OF INFORMATION

We collect both Personal Information and Non-Personal Information that you provide directly to Us or that We may obtain in connection with Our Services and Site. The types of Personal Information We collect may include your

- Name
- Email Address
- Company Name
- Address
- Phone Number
- Company Related Contact Details
- Account Username
- Password(s)
- Responses to Security Questions
- Job Function
- Job Title
- Industry Sector
- Location of Your Mobile Device

The types of Non-Personal Information We collect may include device and tool information related to your account (*e.g.*, serial number and date purchased), the type of browser you use, access times, pages viewed, number of clicks, service activation codes, connected devices, nodes, configurations.

USE OF INFORMATION

We use Personal and Non-Personal Information for various purposes, including to (a) provide, audit, maintain, support and improve Our Services and Site and support and interact with you as you use those Services and/or Site; (b) send you related information, including confirmations, invoices, technical notices, updates, security alerts, training and support and administrative messages; (c) enhance security, monitor and verify identity or service access, combat fraud, spam, malware or other network and/or information security risks; (d) conduct research and development; (e) monitor and analyze trends, usage and activities in connection with Our

Services and related tools and those of third parties; (f) personalize and improve Services and the Site, and provide advertisements, content or features that match your user profile(s) or interests; (g) process your information for other legitimate business purposes, such as customer surveys, data analysis, audits, collecting and assessing feedback, identifying usage trends, determining the effectiveness of Our marketing campaigns and to evaluate Our products, services, marketing and customer relationships; and/or (h) maintain legal and regulatory compliance. At all times your Personal and Non-Personal information will be used in compliance with all applicable laws and regulations.



COOKIES

Cookies and other tracking technologies such as web beacons/tags, local shared objects (collectively, “Cookies”) are used to enhance your experience by allowing Us to tailor Our content based on your interests and distinguish you from other users of Our Site and Services. Cookies can contain information, such as your user ID or preferences, track the pages you’ve visited, or to save your password so you do not have to re-enter it each time you visit Our Services. Although rejecting certain Cookies will not interfere with your ability to interact with most of Our Services, certain functions and/or Services might be unavailable to you if you reject certain Cookies.

NetAlly uses and allows certain third-party Cookies on Our Site to help Us understand what product information is of most interest to you, to send advertisements tailored to your interests, and to measure the effectiveness of such advertising and other information. These third-party Cookies collect and analyze certain types of Personal Information, including IP address, browser type, system language, screen resolution metrics, ISP, pages visited and URLs of web pages that referred visitors to the Site, OS version, geo location, time zone(s), date time stamp(s), time spent on pages, clickstream data session information and other similar information. The third-party Cookies may collect such Personal Information on Our Site and combine the information collected with other Personal and Non-Personal Information from other websites and/or other online or mobile products and services you may use or visit.

DATA PROTECTION AND SECURITY

The security of all information provided is especially important to NetAlly. We have in place physical, administrative, and technical safeguards designed to protect your Personal and Non-Personal Information. While NetAlly strives to safeguard your Personal Information, We cannot guarantee the security of the information you transmit. We recommend you take every precaution in protecting your Personal Information when you are on the Internet. For example, change your passwords often, use a combination of letters and numbers when creating passwords, and use a secure browser.

The Site may provide links to non-NetAlly websites We believe may be of interest to you. Those Websites are beyond NetAlly’s control. You are advised to check the privacy policies and terms of use of any non-NetAlly Website before using those Websites.

SHARING OF INFORMATION

NetAlly does not share your Personal Information with third parties other than as follows: (a) where it has been de-identified, including through aggregation or anonymization; (b) when you instruct Us to do so; (c) with your consent, for example, when you agree to Our sharing your information with other third parties for their own marketing purposes subject to their separate privacy policies; (d) with business partners, suppliers, service providers, authorized third-party agents or contractors (“Service Providers”) in order to provide the Services or fulfill other requests or service the Site. NetAlly may share Personal Information with its Service Providers to the extent needed to deliver the products or Services or respond to requests for information on products or Services or otherwise support your business needs or interests; (e) to comply with laws or respond to lawful requests and legal process, to protect Our rights and property and that of Our agents, customers, members and others including to enforce Our agreement, policies and terms of use or in an emergency to protect the personal safety of any person; (f) in order to protect any individual’s vital interests, but only where We believe it necessary in order to protect the vital interests of any person; and (g) in connection with or during negotiation of any business transfer, merger, financing, acquisition, or dissolution transaction or proceeding involving sale, transfer, divestiture or disclosure of all or a portion of Our business or assets to another company.

SOCIAL SHARING FEATURES

The Services may offer social sharing features and other integrated tools (such as the Facebook “Like” button, and the LinkedIn and Twitter “Follow” buttons), which let you share actions you take on Our Services with other media, and vice versa. The use of such features enables the sharing of information with your friends or the public, depending on the settings you establish with the entity that provides the social sharing feature. For more information about the purpose and scope of data collection and processing in connection with social sharing features, please visit the privacy policies of the entities that provide these features. NetAlly accepts no responsibility for the privacy practices of these third-party entities.

SECURITY OF YOUR PERSONAL INFORMATION

NetAlly uses industry standard best practices to protect your Personal Information in an effort to prevent loss, misuse, and unauthorized access, disclosure, alteration and destruction, which includes physical access controls, encryption, digital certifications, digital authentications, multi-factor authentication, internet firewalls, intrusion detection and network monitoring depending on the nature of the information and the scope of processing. Our staff who may have access to your information are required to keep all such information confidential.

INTERNATIONAL DATA TRANSFERS

Your Personal Information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws in the U.S. and We may process your information in jurisdictions where Our affiliates/partners and third-party service providers are located. We undertake appropriate safeguards that require that your Personal Information will remain protected in accordance with this Privacy Policy.

EEA USERS ONLY: LEGAL BASIS FOR PROCESSING PERSONAL INFORMATION

If you are a visitor or user based in the European Economic Area (“EEA”), NetAlly is the data controller of your Personal Information unless the data is collected in circumstances where one of Our affiliates is running a local event, training session or survey. In such circumstances, We will endeavor to make this clear to you in a context specific notification at the point We collect your Personal Information. Our legal basis for collecting and using



the Personal Information described above will depend on the Personal Information concerned and the specific context in which We collect. We will collect Personal Information only where We (a) have your consent to do so; (b) need the Personal Information in order to perform an obligation with you or where the processing is in Our legitimate interests; or (c) have a legal obligation to collect Personal Information from you. If We ask you to provide Personal Information to comply with a legal requirement or to perform a contract with you, We will make this clear at the relevant time.

EEA, UNITED KINGDOM AND SWITZERLAND RESIDENTS ONLY: YOUR PRIVACY RIGHTS

If you are a resident of the EEA, United Kingdom, or Switzerland, you have the following data protection rights:

- you can access, correct, update or request deletion of your Personal Information;
- you can object to processing of your Personal Information, ask Us to restrict processing of your Personal Information or request portability of your Personal Information; and
- if We collected and processed your Personal Information with your consent, you can withdraw your consent at any time. However, withdrawing your consent will not affect the lawfulness of any processing We conducted prior to your withdrawal, nor will it affect processing of your Personal Information conducted in reliance on lawful processing grounds other than consent.

If Personal Information pertaining to you as an individual has been submitted to the Service by or on behalf of a NetAlly customer and you wish to exercise any data protection rights you may have with respect to that data under applicable law, including (as applicable) the right to access, port, correct, amend or delete such data, please inquire with the dataprivacy@netally.com. If you wish to make your request directly to Us, please provide the name of the NetAlly customer who submitted your data to Our Service. We will refer your request to that NetAlly customer and will support them as needed in responding to your request within a reasonable timeframe.

In order to exercise any of your privacy rights list above, please fill out and submit Our [NetAlly's GDPR Data Subject Rights Request Form](#) or you are free to submit a complaint to a data protection authority about Our collection and use of your Personal Information.

CALIFORNIA USERS ONLY: YOUR PRIVACY RIGHTS

If you are a resident of California, the California Consumer Privacy Act of 2018 (“CCPA”), effective as of January 1, 2020, requires businesses that collect Personal Information of California residents to make certain disclosures regarding how they collect, use and disclose such information. This section addresses those requirements. For a description of all of Our data collection, use and disclosure practices, please read this Privacy Policy in its entirety.

- **Personal Information Collection and Sharing:** NetAlly does not sell Personal Information as We understand sale to be defined by the CCPA and its implementing regulations. The categories of Personal Information We collect about you and the third parties with whom We share that Personal Information for a business purpose are as follows:

Categories of Personal Information We Collect	Categories of Third Parties with Which We Share Information for Business Purposes
Identifiers (name, address, email address, <i>etc.</i>)	Corporate affiliates, vendors, service providers and third-party business partners.
Any categories of Personal Information described in the CCPA subdivision (e) of Section 1798.80 (telephone number, financial information, <i>etc.</i>)	Vendors, service providers, and third-party business partners.
Legally Protected Classifications (gender, marital status, <i>etc.</i>)	Vendors and service providers.
Commercial Information (such as transaction data, <i>etc.</i>)	Vendors, service providers, and third-party business partners.
Internet/Network or Device Activity (browsing history, app usage, <i>etc.</i>)	Vendors and service providers.



Approximate Location Information (location, IP address, city, country, etc.)	Vendors and service providers
Professional or Employment-Related Data (title, employer, etc.)	Vendors, service providers, and third-party business partners.
Education Information (degrees, certifications, etc.)	Vendors and service providers.
Inferences drawn from any of the information identified above	N/A

- **Purposes for Collecting Personal Information:** We collect Personal Information identified in the lists above to communicate with you for marketing and promotional purposes to provide and improve Our services.
- **California Consumer Rights:** California law gives California residents the right to request (a) a copy of Personal Information collected or disclosed for a business purpose in the past twelve (12) months; (b) the deletion of Personal Information collected, subject to certain exemptions (for example, where the information is used by Us to detect security incidents, debugging or to comply with a legal obligation); or (c) that We disclose Personal Information collected, used, and disclosed.

You can submit a copy, deletion or right-to-know request online by filling out [NetAlly’s CCPA Consumer Rights Request Form](#). NetAlly will verify that the information you submit, which includes first name, last name, email address, company, and country/state matches Our records before We fulfill the request. You may use an authorized agent to submit this consumer rights request on your behalf using the methods above, provided, however NetAlly will require such agent to provide signed permission to submit the request on your behalf. Further, NetAlly still may be required to contact you in order to confirm your identity and that this request was submitted with your permission. NetAlly does not discriminate against you for exercising your rights or offer you financial incentives related to the use of your Personal Information.

CHILDREN’S PRIVACY PROTECTION

NetAlly does not target and is not intended for children or young adults under the age of 18. Further, this Site will not knowingly collect Personal Information from children or young adults, and NetAlly will delete such information upon discovery. If you are under 18, you may only use Our product and services with the permission of and under the supervision of a parent or guardian.

DATA RETENTION AND DELETION

We will retain your Personal Information for the period necessary to fulfil the purposes outlined in this Privacy Policy and internal company policies. When NetAlly no longer needs to use your information, We will—unless We need to keep your information to comply with applicable legal or regulatory obligations or the information is required to carry out corporate tasks and achieve Our business objectives—remove it from Our systems and records and/or take steps to properly anonymize it so that you can no longer be identified from it. When NetAlly no longer needs to use your information, We will remove it from Our systems and records and/or take steps to properly anonymize it so that you can no longer be identified from it unless applicable legal or regulatory obligations dictate otherwise.

YOUR COMMUNICATION PREFERENCES OR TO UNSUBSCRIBE

You can always unsubscribe or choose your preferred types and methods of communication by using the “Contact Us” information list below, either by (a) contacting Us by phone, (b) mailing your request either airmail or using a reputable overnight courier; (c) logging into your account through the portal; or (d) sending an email with the words “Unsubscribe” or “Opt Out” in the subject line to dataprivacy@netally.com.

Contact Us

NetAlly, LLC
 Attn: Data Privacy Office
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 United States

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