



Website Privacy Policy

We're Egress Software Technologies Limited, part of the Egress Software Technologies Group. More information about us and our group can be found at <https://www.egress.com/about>.

This privacy policy sets out details about the information that we collect when you use or browse www.egress.com, our partner portal at <https://egress.force.com/partner>, or the apps that we make available to access our services (collectively, our Sites). By using our Sites you confirm that you accept this policy. If you don't, then please don't use them.

This policy describes:

- the information we collect and how we get it
- how we use that information
- who we may share it with and why
- where we may transfer and process it
- what you need to do if you provide information to us about others

If you have any questions we'd be happy to answer them, just get in touch with our DPO:

| | |
|---------------|---|
| Name | Richard Green |
| Address | 12th Floor, The White Collar Factory, 1 Old Street Yard, London, EC1Y 8AF, United Kingdom |
| Email address | DPO@egress.com |
| Phone number | +44 (0)20 7624 8500 |

This policy was last updated on 2 April 2020. The previous version is archived [here](#).

The way we talk about the information we collect through browsing our Sites

| Data type | How we describe it |
|------------------------------|--|
| Personal Contact Information | Information about you that you provide to us, or that we obtain such as: <ul style="list-style-type: none">▪ name, address, phone number, email address and other contact details▪ any permissions, consents or preferences that you give us▪ how you use our Sites (where you can be identified)▪ information that we obtain from third parties that may be linked to you, your employer or your organisation |
| Third-party data | Information that you provide about a third-party (e.g. a prospect, business contact or business with a need for a product or service that we provide or sell). |
| Website data | (i) Usage statistics, system logs, performance and security data, feedback data and aggregated data about how our Sites are used (e.g. performance counters, access logs, metrics, associated metadata, unique identifiers for devices, technical information about the devices used, the network, operating system and browser). (ii) data identified as malicious (e.g. malware infections, cyberattacks, unsuccessful security incidents, or other threats). |

The information we collect and how we get it

We collect information about you in a number of ways. We may combine the information that we receive from these various sources with other information that we collect or receive. We set out further below how we use this information.

| From | How we obtain or receive it | Examples of the types of information |
|--------------------------|--|---|
| You | <ul style="list-style-type: none"> filling out forms on our website or apps contacting us taking part in our competitions or promotions attending our webinars. We may record our webinars, and therefore your participation in them. We will also keep a record of your attendance registering to use any services that we provide (including our partner portal) uploading information to our partner portal | <ul style="list-style-type: none"> Personal contact information Website data IP address (this may not always be personal to you – e.g. where using shared networks) Third-party data |
| Third parties | <ul style="list-style-type: none"> publicly accessible records third-party data providers who we purchase information from (e.g. name, email address, telephone number, job role, employer, market sector/industry, country) making use of our Sites filling out forms on our Sites and providing information about you contacting us and providing information about you government and law enforcement agencies filling out forms on websites or webforms that we host on behalf of a third-party | <ul style="list-style-type: none"> open data and public records records provided by third-parties information sent by or received from third-parties Personal contact information Website data Third-party data |
| General use of our Sites | <ul style="list-style-type: none"> Accessing and using our Sites Cookies | <ul style="list-style-type: none"> Personal contact information IP address (this may not always be personal to you – e.g. where using shared networks) Website data |
| IP address | <ul style="list-style-type: none"> when you visit our Sites we will record your IP address. your IP address may be kept in log files or matched against public or proprietary IP address databases to provide us with information about your visit. This may identify the organisation to whom the IP address is registered (and may in some cases enable us to identify you) | <ul style="list-style-type: none"> IP address Personal contact information |

How we use the data that we collect

We use the personal contact information and website data in each of the following ways.

Relationship management

| What we use it for | Our reasons | Our lawful basis where you're an individual | Our lawful basis where you're a business | Information type |
|---|--|---|--|--|
| Manage, track and develop our relationship with you | Processing to complete any pre-contract processes that you request. | Performance of contract, Legitimate interests | Legitimate interests | Personal contact information |
| | To ensure that we have a productive relationship where we're able to meet user needs and respond to them both proactively and reactively. This is core to our business and forms the cornerstone of success. If we were unable to process personal data for this purpose, our business would cease to function properly. If you participate in the Egress Partner Programme and we were unable to process this information, we would be unable to work effectively with you in pursuing the collective aims of that programme. | Legitimate interests | Legitimate interests | Personal contact information, website data |
| | To contact you in relation to potential sales opportunities, and to understand you and your employer or organisation better through the use of data that we receive from third party providers. | Legitimate interests | Legitimate interests | Personal contact information, website data |
| | We may use your information to create reports or profiles (both of you and the organisations or third-parties that you provide information about) for marketing and analytics purposes. | Legitimate interests | Legitimate interests | Personal contact information, website data |
| | Contact you and any relevant regulator in the event of a breach where we are legally required to do so. | Legitimate interests, Legal obligation | Legitimate interests, Legal obligation | Personal contact information, website data |

Delivery of services

| What we use it for | Our reasons | Our lawful basis where you're an individual | Our lawful basis where you're a business | Information type |
|---|---|---|--|--|
| Ensure our Sites are functioning properly | To ensure that we can provide the access to our Sites. | Legitimate interests | Legitimate interests | Personal contact information, website data |
| | To provide guidance on using our Sites or other support. | Legitimate interests | Legitimate interests | Personal contact information, website data |
| Respond to and resolve complaints, queries and requests | To respond to your queries, complaints and to ensure that you're able to use our Sites appropriately. This may involve the recording of calls that you make to our support desks or sales teams for training and monitoring purposes. We use a 'follow-the-sun' support structure which means that calls may be recorded outside the country you're located in depending on the time of your call and the support staff responding. | Legitimate interests | Legitimate interests | Personal contact information, website data, Third party data |
| Alert you to issues or updates to our partner portal | To ensure that you're presented with relevant information if we change aspects of our partner portal and decide to alert users to those changes. | Not applicable | Legitimate interests | Personal contact information, website data |
| Service information by electronic means | If you use our partner portal we may send, or otherwise display, to you information about the portal (e.g. how you use it, how you could do so more efficiently, faults, issues, updates or notices of times when it won't be available). | Not applicable | Legitimate interests | Personal contact information, website data |

Delivering on contractual obligation and exercising rights

| What we use it for | Our reasons | Our lawful basis where you're an individual | Our lawful basis where you're a business | Information type |
|--------------------|-------------|---|--|------------------|
|--------------------|-------------|---|--|------------------|

| | | | | |
|--|---|---|--|--|
| Make and manage payments made by, or due to, you, your employer or your organisation | Processing to achieve this purpose may take place both pre and post contract agreement (e.g. initial subscription payment and renewals). | Performance of contract, Legitimate interests | Legitimate interests | Personal contact information, website data, Third-party data |
| Meet and perform our audit obligations | We recognise that processing may be required in order for our own compliance purposes (e.g. to ensure that our financial processes are accurate and working properly). | Legitimate interests, Legal obligation | Legitimate interests, Legal obligation | Personal contact information, website data, Third-party data |
| Recover money owed to us or other companies in our group | To ensure that payments are both made and timely. | Legitimate interests | Legitimate interests | Personal contact information, website data, Third-party data |
| Service information by electronic means | If you use our partner portal we may send, or otherwise display, to you information about the portal (e.g. how you use it, how you could do so more efficiently, faults, issues, updates or notices of times when it won't be available). | Not applicable | Legitimate interests | Personal contact information, website data |
| Exercising our rights | We may need to process certain information (including personal data) in order to exercise or enforce our rights under this and any other relevant policies. | Legitimate interests, Legal obligation | Legitimate interests, Legal obligation | Personal contact information, website data, Third-party data |
| Progressing opportunities provided by you through our Partner Portal | If you use our partner portal, once you've provided Third-party data through it to us, we'll use it to progress the opportunity (if any) including to qualify the Third-party data as a lead and, where possible, close it out to a sale. Third-party data is held by us as an independent controller, not a joint controller with you. | Not applicable | Legitimate interests | Personal contact information, website data, Third-party data |

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|--|--|--|----------------------|--|
| Responding to and actioning any request by you in exercising your legal rights in relation to your personal data | Processing may be required to provide confirmation of information to you (e.g. if you make a data subject access or data portability request) or in order to action a request that you make (e.g. correction, deletion, erasure or restriction). | Legitimate interests, Legal obligation | Legitimate interests | Personal contact information, website data, Third-party data |
|--|--|--|----------------------|--|

Legal and regulatory risk management

| What we use it for | Our reasons | Our lawful basis where you're an individual | Our lawful basis where you're a business | Information type |
|---|---|---|--|--|
| Detect and prevent crime | To ensure that we and our group can both detect and report criminal activity. | Legitimate interests | Legitimate interests | Personal contact information, website data, Third-party data |
| Manage risk for us, our group and users | To ensure that we and our group can manage legal and regulatory risk and do so in the most appropriate and compliant manner. | Legitimate interests, Legal obligation | Legitimate interests, Legal obligation | Personal contact information, website data, Third-party data |
| Obey our or our group's legal obligations | To ensure that we and our group can manage legal and regulatory risk and requests in the most appropriate and compliant manner. This may include adapting the way we and our group operates or engages to meet new or future obligations. | Legitimate interests, Legal obligation | Legitimate interests, Legal obligation | Personal contact information, website data, Third-party data |
| Keep our records accurate and up-to-date | Processing to ensure we meet our obligations in respect of data accuracy (this may include acting in response to your notifications). | Legitimate interests, Legal obligation | Legitimate interests, Legal obligation | Personal contact information, website data, Third-party data |
| Run our and our group's businesses in an efficient and proper way | We use shared systems, activities, suppliers and sub-processors in order to help manage legal and regulatory risk within our group, and to operate in a way that ensures quality, consistency and security of service delivery. | Legitimate interests | Legitimate interests | Personal contact information, website data, Third-party data |

Innovation and system development

| What we use it for | Our reasons | Our lawful basis where you're an individual | Our lawful basis where you're a business | Information type |
|--|--|---|--|--|
| Develop new systems, features, functionality and ways to meet user needs | We have a legitimate interest to understand how our Sites are used, and to look at areas where user needs could be met either as new functionality, or in improved ways. | Legitimate interests | Legitimate interests | Personal contact information, website data |
| Study how users are using our Sites | We have a legitimate interest to understand how our Sites are used, and how users benefit from the services that we provide to them. | Legitimate interests | Legitimate interests | Personal contact information, website data |
| Test new products and services | We have a legitimate interest in ensuring that prior to being launched, functionality operates in a secure and efficient manner. | Legitimate interests | Legitimate interests | Personal contact information, website data, Third-party data |
| Show you the right Sites | To ensure that you enter into any contractual relationship with the right company in our group. This also enables us to present content relevant to that jurisdiction where appropriate. | Legitimate interests | Legitimate interests | Personal contact information, website data, IP address, Third-party data |
| To create anonymous reports and statistics | We have a legitimate interest in understanding market risks, trends and activities and, where relevant, utilising the anonymous insights that we can gain from our Sites in the provision of both internal and publicly available reports, blogs and other communications. | Legitimate interests | Legitimate interests | Personal contact information, website data, Third-party data |

Marketing and promotion

| What we use it for | Our reasons | Our lawful basis where you're an individual | Our lawful basis where you're a business | Information type |
|--------------------|-------------|---|--|------------------|
|--------------------|-------------|---|--|------------------|

| | | | | |
|---|--|-------------------------------|----------------------|--|
| To enable your participation in competitions and promotions | Where you've elected to take part, we will process your information in order to enable you to participate. | Consent | N/A | Personal contact information, website data |
| To develop and carry out marketing activities | We have a legitimate interest to conduct marketing, promotional and other advertising activities in order to grow our brand, and the awareness of our products and services. We may use information that we source from third-party data providers to contact you where this is permitted by law. We may also use information we collect about the domain of your email address (e.g. about your employer or organisation, it's sector/industry) or that we can relate back to you (e.g. through cookies) about the products you're interested in to tailor our communications and make them more relevant to you. | Legitimate interests, Consent | Legitimate interests | Personal contact information, website data |

We may use information that we hold about you (or if you're a business, your users) to send information about our and our group companies' products and services. This may be by email or other electronic means available to us in the future. We may use other information available to us in order to tailor our communications. If you're an individual in most circumstances we'll only do this if we have your consent but there may be some situations where we have a legitimate interest in doing so (e.g. where you complete a purchase through our online ecommerce platform).

If you've given your consent, you can withdraw this at any time, or if we're reliant on our Legitimate interests for sending you marketing you can object. In either case, just let us know using the details at www.egress.com/legal/your-rights.

Subscribing to our services

If you purchase a paid-for subscription to our services through our Sites then limited information about your purchase may be shared with relevant payment service providers (see www.egress.com/legal/subcontractors for details). Information may be used by those providers in accordance with their own privacy policies in order to complete your purchase, manage your relationship and any future renewal, and comply with applicable law.

If you provide us with information about others

If you or your business provide information to us about another person or business (such as Third-party data) you must make sure you have the right and permission to do so (e.g. by providing appropriate data collection notices to individuals who are the subject of Third-party data). We're reliant on this in order to receive and process the information you provide. By providing it, you confirm that you do.

Ownership of Third-party data: Once you've uploaded Third-party data to our partner portal, we hold that information (including any personal data within it) as a controller. You may yourself be an independent controller, not a joint controller, of some or all of that Third-party data. We are therefore free to use Third-

party data for our own purposes and to determine when, how and where it is processed (subject to compliance with relevant data protection laws).

Who we may share your information with, and sending information outside the country you're located in

Details of the subcontractors used in the provision of our Sites, marketing activity, prospect and customer relationship management, and in the delivery of our services can be found through the subcontractor page available at www.egress.com/legal/subcontractors. We share your information with these third-parties to help with our business activities and delivery of our services. They are only authorised to use your personal information as necessary to provide the services to us that we request from them and must abide by data privacy and security obligations set out in applicable law.

Where any transfer outside of the country or region that you're located in (e.g. the European Economic Area (EEA), the United States or the UK) occurs, we'll ensure that any such transfer or processing is subject to appropriate legal and technical safeguards with our subcontractors in line with local law requirements.

Provision of Partner Portal: We use Salesforce, Inc. to provide both our Portal and the CRM system that information provided through it is stored on. Details about Salesforce's approach to privacy can be found at <https://www.salesforce.com/uk/company/privacy/>.

Transfer of rights: We reserve the right to transfer our obligations, rights and permissions in personal contact information and website data to any organisation to which we may transfer our business or assets (including if we, or a relevant part of us or our assets, are proposed to be purchased or acquired by a third party).

Selling your information: We will not, and do not, sell or rent your information to third-parties for: (i) valuable consideration (as defined in the California Consumer Privacy Act) or for their direct marketing purposes; or (ii) monetary consideration for the person to license or sell it to additional persons (as defined in Nevada Senate Bill 220). Your information may be shared with third parties as set out above for our business purposes, including the provision of services to you and/or your organisation or employer.

Applicable law: We reserve the right to disclose personal contact information and website data in order to comply with national, EU or Member State law to which we're subject, including to meet national security and law enforcement requirements. You can find out more on our approach [here](#).

What we need you to do

We need to make sure that the information that we hold about you is accurate, up-to-date and still relevant. As a result, we need you to tell us promptly if there are any changes to the information that you provide by letting us know at DPO@egress.com.

How long we'll keep your information for

We'll keep information in accordance with our data retention policies available at www.egress.com/legal, including to maintain records required for legal or regulatory reasons, to show that we complied with our contractual obligations, to respond to any complaints or queries, and for research and statistical purposes.

Your rights as an individual

As an individual user of our Sites, you may have certain rights by law in respect of the personal data that we hold about you. These rights may not always apply as your location and the basis on which we're processing your personal data may affect their availability. You can find out more information about them and our Data Protection Officer at www.egress.com/legal/your-rights.

If you no longer wish to receive direct marketing emails from us, you may opt out of receiving these emails by clicking on the Unsubscribe link at the bottom of any marketing email you receive. We are looking to introduce tools to help you manage your marketing preferences with us (e.g. if you'd still like to receive information, but only on certain topics). Once this is available, you'll find links to it at the bottom of emails as well.

If you ever have a complaint relating to the delivery of our services, or our processing of your personal information, you can find details on how to raise this in our Complaints Policy at www.egress.com/legal. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), or where provided by law, to the regulator for data protection issues in your jurisdiction. We would, however, appreciate the chance to deal with your concerns before you approach a regulator so please contact us in the first instance.

Privacy Shield

We participate in the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks and have self-certified to the U.S. Department of Commerce our adherence to the Privacy Shield Principles for all personal information received from countries in the European Economic Area, Switzerland, and the United Kingdom in reliance on the Privacy Shield. To learn more about Privacy Shield, visit the Privacy Shield website at www.privacyshield.gov/list.

Under Privacy Shield, we are responsible for the processing of personal information we receive and subsequently transfer to a third party acting for or on our behalf. We are liable for ensuring that the third parties we engage support our Privacy Shield commitments. The U.S. Federal Trade Commission has regulatory enforcement authority over our processing of personal information received or transferred pursuant to Privacy Shield. We commit to cooperate and comply with the advice of the regulatory authorities to whom you may raise a concern about our processing of personal information about you pursuant to Privacy Shield, including to the panel established by the EU authorities and the Swiss FDPIC. This is provided at no cost to you.

If you don't feel that we've resolved your complaint or concern satisfactorily you can contact our U.S. based third-party dispute provider (free or charge) at <https://feedback-form.truste.com/watchdog/request>. Under certain conditions, more fully described on the Privacy Shield website, you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

Cookies

To find out more about cookies and how we use them, see www.egress.com/legal/cookies. If you live in California, we need to let you know that some web browsers may transmit "do-not-track" signals to the websites and online services you communicate with. Whilst there is no industry standard that governs what, if anything, we should do if we receive such a signal, our website will not set cookies if you have your browser set to 'Do not track'

Changes to this policy

We can change this policy from time to time. You should check the website periodically to make sure that you have read our most recent policy. When we do make changes, we'll change the date at the top of this document.

About us and applicable law

We're the Egress Software Technologies Group. You can find out more details about us at www.egress.com/about and you can contact us at info@egress.com. When contacting us we strongly recommend you don't email us confidential or personal information. If you do, it's at your own risk although the terms of this policy will apply to our use of that information.

| Where you're resident | Who we are | Governing law | Courts with exclusive jurisdiction | Special Terms |
|-------------------------------------|---|---|--|---|
| North America | <p>Egress Software Technologies, Inc., a Massachusetts corporation.</p> <p>Office: Suite 2, Level 3, 268 Summer Street, Boston, MA 02110, United States</p> | State of Delaware (without regard to its conflict of law principles). | State or Federal courts in and for Boston, Massachusetts | Where applicable, each of us hereby waives its respective rights to a jury trial of any claim or cause of action relating to or arising out of this policy. This waiver is intended to encompass all disputes that may be filed in any court and that relate to the subject matter of this policy (including contract, tort, breach of duty and all other common law and statutory claims). |
| Netherlands, Belgium and Luxembourg | <p>Egress Software Technologies Limited.</p> <p>A Foreign Entity registered on the Dutch Chamber of Commerce (number 74110462)</p> <p>Office: Oval Tower, De Entrée 99-19, Amsterdam, 1101 HE, The Netherlands</p> | Dutch Law | NCC District Court and NCC Court of Appeal Chamber | All proceedings will be in English. In the event that the NCC District Court and/or the NCC Court of Appeal Chamber are incompetent for any reason, the Courts of Amsterdam, The Netherlands shall have exclusive jurisdiction. |
| Rest of the World | <p>Egress Software Technologies Limited.</p> <p>Registered in England and Wales (number 06393598).</p> <p>Registered office: 12th Floor, The White Collar Factory, 1 Old Street Yard, London, EC1Y 8AF, United Kingdom.</p> <p>VAT number: 921 4606 46.</p> | England and Wales (except if you're a consumer resident of Northern Ireland or Scotland when you may bring proceedings there) | Courts of England and Wales (except if you're a consumer resident of Northern Ireland or Scotland and have brought proceedings there when the Northern Irish or Scottish Courts will have jurisdiction). | N/A |

Our Sites are provided by Egress Software Technologies Limited, registered in England and Wales (number 06393598) for and on behalf of itself and the other members of the Egress Software Technologies Group.

EU Representative

If the United Kingdom leaves the European Union and/or the European Economic Area: (i) without a deal; or (ii) with a deal that does not remove any obligation on Us to appoint a representative within the European Union in accordance with Article 27 of the General Data Protection Regulation, Egress Software Technologies Limited (a foreign company registered on the Dutch Chamber of Commerce) further identified in the section above is our EU representative.

Glossary

Legitimate Interest means our interest in conducting and managing our business to enable us to give you the best service and experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Performance of Contract means processing your personal information where necessary for the performance of a contract that we have with you, or to take steps before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.