



Service Privacy Policy

We are Egress Software Technologies Limited, part of the Egress Software Technologies Group. More information about our group can be found at www.egress.com/about.

Your information will be held by us for and on behalf of us and our group companies, and this policy sets out how we and they will look after information that you give us, or that we get from other sources, or learn about you through our relationship with you when you use our services.

Below you can find details of:

- 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 are 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 **9 October 2020**. The previous version is archived [here](#).

The way we talk about the information we collect

Data type	How we describe it
CRM Information	The database, logs and other collections of information about you (and, if you are a business, your users) that is provided to us by you, your users, or that we obtain in connection with: <ul style="list-style-type: none">▪ contact details▪ the creation and administration of accounts▪ how our services, software and support are used, accessed and interacted with▪ any permissions, consents or preferences (including to access your data through third party email products when you use our plug-ins)▪ you being our customer, and information that we obtain from third parties that may be linked to you, your employer or your organisation
Content	Data, text, audio, video, images and other materials transferred, stored, shared or hosted on or through the services by you and third parties. It does not include CRM Information or System Data.

System Data	(i) Usage statistics, system logs, performance and security data, feedback data, records of support requests, and aggregated data about how our sites, services and apps are used (e.g. performance counters, access logs, metrics, associated metadata, unique identifiers for devices, technical information about the devices you use, the network, operating system and browser); (ii) data identified as malicious (e.g. malware infections, cyberattacks, unsuccessful security incidents, or other threats). This may contain limited CRM Information where it appears, for example, in log records but excludes Smart Data.
Smart Data	The record of individual user email behaviour and associations formed from the machine learning and artificial intelligence led processing, collection and analysis of email metadata (e.g. date and time, sender and recipient email addresses, and other unique message identifiers) and other domain, location and 'trust' data. It does not include CRM Information and System Data.

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. We do not, and will not, use analysis of your users' behaviour to provide insight to others - sometimes called 'cross-tenant insights'

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We limit access to your personal information to those employees, agents, contractors and other third-parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

From	How we obtain or receive it	Examples of the types of information
You	<ul style="list-style-type: none"> ▪ purchasing, registering for, logging into, or using your account ▪ filling out forms on our website or apps ▪ uploading or sending Content ▪ making use of our services ▪ contacting us ▪ if you take 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 	<ul style="list-style-type: none"> ▪ CRM Information ▪ System Data ▪ Content ▪ Smart Data ▪ Cookies ▪ IP address

Third parties	<ul style="list-style-type: none"> companies or individuals that introduce you to us credit reference agencies third-party data providers who we purchase information from (e.g. name, email address, telephone number, job role, employer, market sector/industry, country) third-party Content that includes information about you, or your employer or organisation making use of our services filling out forms on our website or apps and providing information about you contacting us and providing information about you publicly accessible records 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"> CRM Information Content sent by other users or recipients Smart Data Cookies open data and public records records provided by third-parties credit reports or other financial assessments
Microsoft or Google	<ul style="list-style-type: none"> if you use our plug-ins, you grant us permission to access each email you send or receive using our services in order to encrypt or decrypt it if you use Prevent, we process Smart Data to provide that service to you 	<ul style="list-style-type: none"> CRM Information Content Smart Data
General use of our services	<ul style="list-style-type: none"> accessing and using them, our websites or apps cookies 	<ul style="list-style-type: none"> CRM Information IP address (this may not always be personal to you – e.g. where using shared networks) Cookies System Data
Prevent and Protect	<ul style="list-style-type: none"> email meta data (date and time, sender and recipient email addresses and other unique message identifiers) Content sent by you and other users or recipients 	<ul style="list-style-type: none"> CRM Information Content Smart Data IP address
IP address	<ul style="list-style-type: none"> when you visit our website, apps or use our services 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 CRM Information
Cookies	<ul style="list-style-type: none"> Please see more in our Cookie Policy 	<ul style="list-style-type: none"> Cookies

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 are an individual	Our lawful basis where you are a business	Information type
Manage, track and develop our relationship with you and your employer or organisation	Processing to complete any pre-contract processes that you request.	Performance of contract	Legitimate interests	CRM Information
	To ensure that we have a productive relationship where we are able to meet customer 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.	Legitimate interests	Legitimate interests	CRM Information, System 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 we receive from third-party providers.	Legitimate interests	Legitimate interests	CRM Information, , Cookies
	We may use your information to create reports or profiles for marketing and analytics purposes.	Legitimate interests	Legitimate interests	CRM Information, System Data, Cookies
	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	CRM Information, System Data, Content, Smart Data

Delivery of services

What we use it for	Our reasons	Our lawful basis where you are an individual	Our lawful basis where you are a business	Information type
Provide the service access and support to you	To ensure that we meet our contractual obligations to you.	Performance of contract	Legitimate interests	CRM Information, System Data, Content, Smart Data, Cookies

Provide guidance on our services	This could include responding to pre-contract questions, and also dealing with support or service questions during our contract with you.	Performance of contract	Legitimate interests	CRM Information, System Data, Content, Smart Data
Respond to and resolve complaints, queries, requests and support tickets	To respond to your queries, complaints and to ensure that you are able to use our platform and services 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 are located in depending on the time of your call and the support staff responding. Processing of Content may be required for resolving some support tickets.	Legitimate interests	Legitimate interests	CRM Information, System Data, Content, Smart Data, Cookies
Ensure our services are functioning properly	To ensure that we can provide the services that we are contracted to provide. This may include both automated and manual processing (but not automated decision making in the context of the Data Protection laws in the UK and the EU).	Legitimate interests, Performance of contract	Legitimate interests	CRM Information, System Data, Content, Smart Data, Cookies
Alert you to issues or updates to your services	To ensure that you are presented with relevant messaging based on the access and services that you have purchased from us and our group.	Legitimate interests	Legitimate interests	CRM Information, System Data, Content, Smart Data

Scan meta data to provide you with feedback on the interactions you are about to make, to Prevent or to encrypt or unencrypt email traffic and Content in providing Protect	To provide our Prevent and Protect services. Prevent uses certain Smart Data in order to understand your, and any of your users', behaviour and associations. Protect requires the processing to meet the encryption and decryption obligations where you have subscribed to this service.	Performance of contract	Legitimate interests	CRM Information, System Data, Content, Smart Data
Enable third party plug-ins you request	To integrate with and respond to third party plug-ins in order to provide the services you have subscribed to.	Performance of contract	Legitimate interests	CRM Information, System Data, Content, Smart Data
Service Information by electronic means	We may send, or otherwise display, to you information about the services you receive from us.	Performance of contract	Legitimate interests	CRM Information, System Data, Smart Data

Delivering on contractual obligation and exercising rights

What we use it for	Our reasons	Our lawful basis where you are an individual	Our lawful basis where you are a business	Information type
Make and manage payments made by, or due to, you, your employer or 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	CRM Information, System Data
Meet and perform our audit obligations	We recognise that processing may be required in order to exercise our rights under the terms of our contract with you, or for our own compliance purposes.	Legitimate Interests, Legal obligation	Legitimate Interests, Legal obligation	CRM Information, System Data, Smart Data
	Processing may be required where requested by a customer to meet any audits conducted in accordance with the terms of our contracts with them.	Performance of contract	Legitimate Interests	CRM Information, System Data, Smart 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	CRM Information
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	CRM Information, System Data, Smart Data
Exercising our rights	We may need to process certain information (including personal data) in order to exercise or enforce our rights under our agreement with you (including this and any other relevant policies).	Legitimate interests, Legal obligation	Legitimate interests, Legal obligation	CRM Information, System Data

Legal and regulatory risk management

What we use it for	Our reasons	Our lawful basis where you are an individual	Our lawful basis where you are 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	CRM Information, System Data, Smart Data
Manage risk for us, our group and our customers	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	CRM Information, System Data, Smart 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	CRM Information, System Data, Smart 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	CRM Information

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	CRM Information, System Data, Smart Data, Cookies
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Innovation and system development

What we use it for	Our reasons	Our lawful basis where you are an individual	Our lawful basis where you are a business	Information type
Develop new systems, features, functionality and ways to meet customer needs	We have a legitimate interest to understand how our websites and services are used, and to look at areas where customer needs could be met either as new functionality, or in improved ways.	Legitimate Interests	Legitimate interests	CRM Information, System Data, Smart Data, Cookies
Study how customers and users use our websites and services	We have a legitimate interest to understand how our services are used, and how customers benefit from the services that we provide to them.	Legitimate Interests	Legitimate interests	CRM Information, System Data, Smart Data, Cookies
Test new products and services	We have a legitimate interest in ensuring that prior to being launched, products and services operate in a secure and efficient manner.	Legitimate Interests	Legitimate interests	CRM Information, System Data, Smart Data
Show you the right websites	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	CRM Information, System Data, IP address, Cookies
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 services in the provision of both internal and publicly available reports, blogs and other communications.	Legitimate Interests	Legitimate interests	CRM Information, System Data, Smart Data

Marketing and promotion

What we use it for	Our reasons	Our lawful basis where you are an individual	Our lawful basis where you are a business	Information type
To enable your participation in competitions and promotions	Where you have elected to take part, we will process your information in order to enable you to participate.	Consent	N/A	CRM Information, System 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 are interested in to tailor our communications and make them more relevant to you.	Legitimate Interests, Consent	Legitimate interests	CRM Information, System Data, Cookies

We may use information that we hold about you (or if you are a business, your users) to send information about our and our group's 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 are an individual in most circumstances we will 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 have given your consent, you can withdraw this at any time, or if we are reliant on our legitimate interests for sending you marketing you can object. In either case, just let us know using the unsubscribe link in our emails, or find out more 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 and terms in order to complete your purchase, manage your relationship and any future renewal, and comply with applicable law.

Free user account information

If you have a free user account with us and the domain of the email address associated with it is owned or controlled by an organisation (like your employer) then:

- we may share details of the email address associated with your account with that organisation (either as a result of a request we receive or as part of discussions with it relating to a potential purchase)
- if that organisation subsequently establishes a relationship with us and wishes to add your account to its own business account, then we will transfer your account into its business account and certain information concerning your free user account and your past use of it may become accessible to that organisation and its administrator

If you provide us with information about others

If you or your business provide information to us about another person, or if you or your business send their information or Content using our services, you must make sure you have the right and permission to do so. We are reliant on this in order to receive and process the information you or your business provide. By providing it, you confirm that you do.

Where you use Prevent, or where you correspond with an individual or business that does so, your emails and their associated metadata may be routinely monitored to protect against the risk of misaddressed emails and to improve the accuracy of those decisions. This may include the processing of certain Smart Data about you (e.g. domain characteristics, the strength of your association with the sender) by our Prevent service following your receipt of a secure email to determine the level of access that you may be able to have to that Content without registering for an account with us.

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

Details of the sub-contractors used in the provision of our services, marketing activity, and prospect and customer relationship management can be found through the sub-contractor 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.

Who we may share your information with	Our reasons	Our lawful basis where you are an individual	Our lawful basis where you are a business	Information type	Where data is hosted
Microsoft	If you use Microsoft Office Online to edit documents within Egress Workspace, please be aware of how your Content is processed by Microsoft when using this tool. More details can be found here .	Performance of contract – we action your request to utilise your chosen method of editing documents within Secure Workspace. You can change your	Legitimate Interests	Content	Variable based on Microsoft policy
Salesforce, Inc.	Our Group’s CRM platform, used by our group companies for customer relationship management services.	Legitimate Interests	Legitimate Interests	CRM Information	EU

Egress Group companies	We use shared systems (such as our CRM platform, account systems and other internal platforms and processes) in order to operate our group effectively. Your information may be stored on these shared systems and therefore be accessible to other companies within our group.	Legitimate Interests	Legitimate Interests	CRM Information, System Data, Smart Data	Generally hosted within EEA but may be transferred within our group
Host providers	If you subscribe to our services, we will host your Content on one or more of the providers listed on our website. Your Content will remain encrypted and these providers will not have access to it.	Performance of contract, Legitimate Interests	Legitimate Interests	Content, Smart Data	US, UK and EU
Zendesk, Inc.	Provides our support service system (including support ticket system and online chat service).	Legitimate Interests	Legitimate Interests	CRM Information and other data that you provide as part of your support ticket (we ask that this is kept to the minimum necessary and that you do not include Content)	EU
CalliTech Limited (trading as MoneyPenny)	Provide overflow support call services, and transfer out-of-hours support calls to our engineers.	Legitimate Interests	Legitimate Interests	CRM Information	UK
The IT Service Limited	May be involved in providing training services to you where you purchase these from us.	Legitimate Interests, Performance of Contract	Legitimate Interests	CRM Information	UK
Twilio, Inc.	Provide the SMS service that may be used for two factor authentication or password resets when you use our services.	Legitimate Interests	Legitimate Interests	Limited CRM Information	US

Marketo, Inc.	Assist in data collection and the sending out of marketing correspondence. We also use a cookie provided by Marketo, Inc. Please see our Cookie Policy for more information.	Legitimate Interests	Legitimate Interests	CRM Information	EU
Zoom Video Communications, Inc.	Provide our webinars, conference calls and remote access to your device (if that is required) are provided by this entity. You are able to determine if these are used (i.e. by accepting an invite to attend a webinar, conference call or by accepting our request to access your device – although this latter use is rare).	Legitimate Interests, Consent	Legitimate Interests	CRM Information	US
MailGun Technologies, Inc.	Provide mail delivery services in relation to Secure Workspace, Webforms and Investigate.	Legitimate Interests	Legitimate Interests	CRM Information, System Data	US
Law enforcement	We reserve the right to disclose information in order to comply with national, EU or Member State law to which we are subject, including to meet national security and law enforcement requirements. You can find out more on our approach here .	Legitimate Interests	Legitimate Interests	CRM Information, System Data, Content, Smart Data	Variable depending on the nature of the request

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

Content: Your Content will be stored on secure servers in the UK, the European Economic Area or the United States, depending on your location, onboarding choice and the service(s) that you are subscribing

to. You acknowledge that our services are software-as-a-service and so you, your users and recipients may access Content outside the country you are located in or the Content is hosted in (e.g. by logging into an account anywhere in the world). Where this happens, Content may be processed by you, your user or the recipient on the device used wherever that is located. You acknowledge that no matter where Content is stored, we do not control or limit the locations from which you and recipients may access it. Where a recipient responds to a secure email that you have sent to them, the Content they create in responding to you will be stored in the jurisdiction that they have selected (which may not be the same as you). In each case, we will facilitate this processing for the purpose of performing our contract with you or a relevant recipient or user (where you are an individual) or for our legitimate interests in providing the requested services to you (where you are a business).

Your Content may be shared with third parties as directed by you through your use of the features of our services. We may share Content (in encrypted format) with other companies in our group and authorised sub-processors where they provide part of the services that you have subscribed to with us.

If you are a free user or subscribe to our services online, your Content will be stored on secure servers in the UK and/or the European Economic Area.

Transfer of rights: We reserve the right to transfer our obligations, rights and permissions in CRM Information, System Data, Smart Data and Content 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.

What we need you to do

We need to make sure that the information that we hold about you (and if you are a business, your users) 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 (or they) have provided by letting us know at DPO@egress.com.

You must ensure that you always have (and if you are a business, that your users always have) a lawful reason under applicable law for the processing of your Content and any third party email address through your use of our services, and you must comply with all applicable law in respect of how you use it.

How long we will keep your and your users' information for

We'll keep CRM Information, Content, System Data and Smart Data 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, 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 are 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 would still like to

receive information, but only on certain topics). Once this is available, you will 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 do not feel that we have 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.

International Privacy Verification

Whilst the Court of Justice of the European Union (CJEU) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) ruled the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks invalid in the summer of 2020, we remain committed to the Privacy Shield Principles. In recognition of our continued commitment, in October 2020 we self-certified with [the International Privacy Verification](#) programme (IPV). The IPV's assessment criteria are aligned with those of the Privacy Shield and therefore by certifying with the IPV we are able to continue to demonstrate our compliance with the core Privacy Shield Principles in relation to the protection of personal data transferred outside of the UK and EU.

If you do not feel that we have 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>.

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 (and, if you are a business, your users) should check this page periodically to make sure that you, or they, have read our most recent policy. When we do make changes, we will change the date at the top of this document. If we make material changes regarding our privacy practices, we may in some instances require you and/or your users to read and accept any changes before continuing to use their account.

About us and applicable law

We are 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 do not email us confidential or personal information. If you do, it is at your own risk although the terms of this policy will apply to our use of that information.

Where you are resident	Who we are	Governing law	Courts with exclusive jurisdiction	Special Terms
United States	Egress Software Technologies, Inc., a Massachusetts corporation. Office: Suite 2, Level 3, 268 Summer Street, Boston, MA 02110, United States	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).
Canada	Egress Software Technologies Inc., an Ontario corporation Office: Suite A304, 11685 Yonge Street, Richmond Hill, L4E 0K7, Canada	Province of Ontario	Province of Ontario	N/A

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

The Egress Software Technologies Group is made up of different legal entities, details of which can be found [here](#). This privacy policy is issued on behalf of the Group so when we mention we, us or our in this policy, we are referring to the relevant company responsible for processing your personal data. We let you know which entity is the controller of your data when you subscribe for a service with us. Egress Software Technologies Limited is the controller and responsible for this website.

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 Brexit Transition period ends and the United Kingdom leaves the European Union and/or the European Economic Area: (i) without a formal trade deal; or (ii) with a deal that does not remove any obligation on Us to appoint a representative within the European Union; or (iii) without an adequacy decision having been granted by the European Commission, then 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.