

# INTERNATIONAL PRIVACY POLICY

## Who We Are and Scope of this Privacy Policy

We are TRUE Space, Inc., a U.S. company headquartered in The United States, Smyrna, Georgia. In this Privacy Policy, we explain what personal data we collect from visitors to the TRUE Space websites and/or properties that link to this Privacy and how we use such personal data.

It is important to note that this Privacy Policy does not apply to any other data, such as any personal data that may be included in the files, documents, recordings, chat logs, transcripts, and similar data that we maintain on our customers' behalf, as well as any other information our customers may upload to their TRUE Space account(s) in connection with their use of our Services (which we refer to as "Content" in our Terms of Service) or information gathered from other channels, such as publicly available sources. For the avoidance of doubt, we process customer Content, including any personal data which may be included therein, solely for the purpose of providing and operating our Services to our customers and only in accordance with their written instructions, which typically take the form of our Terms of Service and/or any similar written agreement between TRUE Space and our customer.

## Data Categories and Collection Purposes

When you visit our website(s) and/or use our Services, you provide the following categories of personal data to us:

- **Customer Account and Registration Data** is data you provide when you create your account with us, request support or technical assistance, or register for events, webinars, whitepapers and surveys, which typically includes first and last name, billing data, and a valid email address. We need this data to provide the Services to you, to maintain and support your account, as well as to collect payment. Legal basis for the processing of this data is our legitimate interest to do business with you, your employer or business and perform our contractual obligations under the applicable Services agreement.
- **Service Data (including Session, Location and Usage data):** When you visit our websites and use our Services, we receive data that you or others voluntarily enter, as well as data automatically logged by the website or Service, for example, duration of session, connections made, hardware, equipment and devices used, IP addresses, location, language settings, operating system used, unique device identifiers and other diagnostic data. We need this information to provide, operate, and improve our Services. We collect location-based data for the purpose of providing, operating, and supporting the service and for fraud prevention and security monitoring; you can disable location data transmission on mobile devices at any time by disabling location services from the settings menu on your device. Legal basis for the processing of this data is our legitimate interest to do business with you, your employer or business, or customers that use our Services to communicate with you and your business and perform our contractual obligations under the applicable Services agreement.

We strive to limit the types and categories of personal data that is collected from, and processed on behalf of, our users to include only information which is necessary to achieve the purpose(s) for which it was collected and we do not use personal data for additional purpose(s) which are incompatible with their initial collection. In other words, we have measures and policies in place

designed to ensure that we only collect and process information from our users that we believe is necessary to operate and provide them with a world-class Service.

We also process your personal data to comply with applicable laws, including those of the European Union ("EU") and/or individual European Economic Area ("EEA") Member States and such compliance obligations are the legal basis for such processing.

If you grant consent to our placement of cookies or for us to contact you for marketing purposes, we may also use your personal data for marketing purposes and the legal basis for such processing is your consent. We may also contact you under a legitimate business purpose (e.g., if you are a current subscriber to one of our Services).

## How We Use Your Data

We use the data we collect from visitors to our websites to: (a) provide and operate our Services; (b) address and respond to service, security, and customer support needs; (c) detect, prevent, or otherwise address fraud, security, unlawful, or technical issues; (d) comply with applicable laws and administrative requests, protect our rights, assert and defend against claims; (e) fulfill contracts; (f) maintain and improve our Services; (g) provide analysis or valuable data back to our customers and users; (h) assess the needs of your business to determine and promote other TRUE Space products which we believe may be helpful to you; (i) provide product updates, marketing communications, and service data; (j) conduct research and analysis for business planning and product development; (k) display content based upon your interests; and (l) to the extent permitted by law, we may combine, correct and enrich personal data that we receive from you with data about you from other sources, including publicly available databases or from third parties to update, expand and analyze our records, identify new prospects for marketing, and provide products and Services that may be of interest to you.

For all Google data, we will not use the data for serving advertisements and will not allow humans to read the data (i.e., by utilization of robust access controls, procedures, etc., inclusive of the principle of least privilege) unless: (i) we have your affirmative agreement for specific data; (ii) doing so is necessary for security purposes, such as investigating abuse; (iii) in response to requested support/troubleshooting; (iv) to comply with applicable law; and/or (v) if the data have been anonymized, for our internal operations related to the applicable TRUE Space services noted above.

## Analytics, Cookies and Other Web Site Technologies

We continuously improve our websites and Services through the use of first- and third-party cookies and other web analytics tools, which help us understand how our visitors use our websites, desktop tools, and mobile applications, what webpages, features and functions they like and dislike, and where they may have run into problems which need to be addressed.

### **Google Analytics and Adobe Marketing Cloud**

We use Google Analytics. You can prevent your data from being used by Google Analytics on our websites by installing the Google Analytics opt-out browser add-on. For enhanced privacy purposes, we also employ IP address masking, a technique used to truncate IP addresses collected by Google Analytics and store them in an abbreviated form to prevent them from being traced back to individual users. Portions of our website may also use Google Analytics for Display Advertisers including DoubleClick or Dynamic Remarketing which provide interest-based

ads based on your visit to this or other websites. You can use Ads Settings to manage the Google ads you see and opt-out of interest-based ads.

**Social Media:** Many of our websites include social media features, such as Facebook, Google, and Twitter “share” buttons. If you use these features they may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly – you can exercise your rights with respect to the use of this data as specified in the “Exercising Choice” section below. These services will also authenticate your identity and provide you the option to share certain personal data with us such as your name and email address to pre-populate our sign-up form or provide feedback. Your interactions with these features are governed by the Privacy Policy of the third-party company providing them.

## **Exercising Choice**

You can still view our websites if you choose to set your browser to refuse all cookies; however, you will need to keep certain cookies enabled to establish an account or to install the Services.

## **Recipients**

Within our organization, we apply access controls to limit the recipients of personal data on a "need to know" basis. Our customer support and technical staff, billing and finance personnel, and representatives of our legal and audit departments have access to your data as necessary for the legitimate purposes of our data processing.

We share your personal data: (a) with our affiliated companies and subsidiaries which are directly or indirectly owned by our parent entity, TRUE Space, Inc.; (b) at your direction, with separate, specific notice to you, or with your consent; (c) with third-party service providers under appropriate confidentiality and data privacy obligations; (d) in connection with a merger, divestiture, acquisition, reorganization, restructuring, financing transaction or sale of assets pertaining to a business line; and (e) as required by law or administrative order, to assert claims or rights, or to defend against legal claims.

## **Data Retention**

We keep your personal data in a form which permits identification for no longer than needed for the business purposes for which it was collected or as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Personal data processed in the context of a contract with you will be retained by us for the term of the contract and for a reasonable time afterwards as might be required to determine and settle any related claims. Where our processing of your personal data is based on legitimate interests or compliance with legal obligations, it will be deleted as soon as the applicable underlying purpose has expired. Personal data processed based on your consent will be deleted if and when you withdraw such consent.

## **Cross Border Data Transfers**

Your personal data may be transferred to and/or accessible globally by TRUE Space’s affiliated and unaffiliated service providers, including in countries where we operate and countries outside of the EU/EEA in which the level of data protection may not be as high as within the EU/EEA. In all cases, TRUE Space complies with applicable legal requirements and provides an adequate level of data protection regardless of where the data are transferred or accessed. TRUE Space

also ensures that data processing is conducted in accordance with applicable data protection laws. For transfers of personal data outside of your jurisdiction, TRUE Space uses the following frameworks as applicable:

TRUE Space has implemented a comprehensive data privacy and security program which includes appropriate technical and organizational measures designed to safeguard and protect the personal, identifiable, and/or confidential information we collect or you share with us.

## Changes

We update this Privacy Policy from time to time to reflect changes to our personal data handling practices or respond to new legal requirements and will post updates here. However, if we make any material changes that have a substantive and adverse impact on your privacy, we will provide notice on this website and additionally notify you by email (sent to the e-mail address specified in your account) for your approval prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

## Children's Privacy

TRUE Space's webpages are intended for general audiences – we do not seek through our sites to gather personal data from or about persons that are minors (i.e., not the age of majority). If you inform us or we otherwise become aware that we have unintentionally received personal data from a minor, we will delete this information from our records.

## Your Rights and Contacting TRUE Space

Subject to conditions specified by applicable law, persons have the right to: (i) inquire whether and what kind of personal data we hold about you and how it is processed, and to access or request copies of such personal data; (ii) request the correction or supplementation of personal data about you that is inaccurate, incomplete or out-of-date in light of the purposes underlying the processing; or to (iii) obtain the erasure of personal data no longer necessary for the purposes underlying the processing, processed based on withdrawn consent, processed for legitimate interests that, in the context of your objection, do not prove to be compelling or necessary for the establishment, exercise or defense of legal claims, or processed in non-compliance with applicable legal requirements. In addition, you have, subject to the conditions set out in applicable law and without limitation, the rights to: (iv) request us to restrict the processing of personal data in certain situations where you feel its processing is inappropriate; (v) object, on grounds relating to your particular situation or where your personal data is used for direct marketing purposes, to the processing of personal data for legitimate interests; and to (vi) request portability of personal data that you have provided to us, where the processing of such personal data is based on consent or a contract with you and is carried out by automated means. In case of concerns, you also have the right to lodge a complaint with a supervisory authority having appropriate jurisdiction. If you have questions or requests relating to our privacy practices and this Privacy Policy or would like to exercise the above mentioned rights of access, rectification, erasure, restriction, objection and data portability, you may contact us via the Contact US website form. We will respond to your request as required by applicable law, but in any regard within (30) days.

Please note that for personal data about you that we have obtained or received for processing on behalf of a separate, unaffiliated entity – which determined the means and purposes of

processing, all such requests should be made to that entity directly. We will honor and support any instructions they provide us with respect to your personal information.

If you wish to no longer receive marketing communications from us, you can opt-out of marketing by clicking on the unsubscribe link on any marketing email you receive.

If you have questions or requests relating to personal data or privacy, please contact us through our website Contact Us form or phone number.