

Platform Privacy Policy (Tier 2)

Updated: May 24, 2018

Hurify Digital Markets, Inc. ("Hurify") is committed to protecting your privacy and ensuring you have a positive experience using our products and services, including our application and cloud-based services available through the Hurify platform (collectively "Platform"). This Privacy Policy covers the privacy practices that apply when Hurify customers ("Customers") use the Platform. This Privacy Policy does not cover any information or data collected by Hurify through its website www.hurify.co. For privacy practices when clients use those channels and/or platforms, please see .

This policy outlines our privacy practices and how we collect and use the Personal Data you provide through the Platform. As used in this Platform Privacy Policy, "Personal Data" means any information that can be used to individually identify a person, and may include, but is not limited to, name, email address, postal or other physical address, credit or debit card number, title, and other personally identifiable information.

If you reside in the European Union ("EU"), United Kingdom, Lichtenstein, Norway, Iceland or Switzerland, you may have additional rights with respect to your Personal Data, as further outlined below. These rights may include rights under the EU's General Data Protection Regulation ("GDPR"), if you are a resident of the EU, United Kingdom, Lichtenstein, Norway or Iceland.

Hurify Digital Markets, Inc. will be the controller of your Personal Data that is provided, collected and/or processed pursuant to this Platform Privacy Policy, except where otherwise expressly stated below. If you have any questions about whether any of foregoing applies to you, please contact us using the information set forth in the "Contact Us" section below.

This policy may be updated from time to time for reasons such as operational practices or regulatory changes, so we recommend that you review our Platform Privacy Policy when returning to the Platform.

Collection of your Personal Data

We collect the following categories of Personal Data about you when you use or otherwise interact with the Platform:

- Name, email address, and [] ("Registration Information")
- Passwords
- Name of your employer
- Location based information
- Our servers automatically record certain information when you use the Platform, including your IP address, operating system type and version, client version, IP addresses along the network path, and the MAC address of your internet connection ("Host Information")
- We also automatically record information about your usage of the Platform, including actions taken, date and time, frequency, duration, quantity, quality, network connectivity, and performance information related to logins, clicks, messages, contacts, content shared, calls, use of video and screen sharing, meetings, cloud recording, and other feature usage information ("Usage Information")
- Other information you upload, provide, or create while using the Platform ("User-Generated Information"), as further detailed in the "User Generated Information" section below

We collect and/or process your Personal Data in connection with the below activities related to the Platform:

- Account registration
- Use of certain Platform features

- Improvement of the Platform
- Marketing communications related to the Platform
- To display your identity to other users
- Requesting service and support for the Platform
- To optimize your connection to our data center

Processing of your Personal Data

We will use your Personal Data only in accordance with our Platform Privacy Policy. If you do not wish us to continue using your Personal Data in this manner, you can request that your account be deactivated by contacting us as specified in the “Contact Us” section.

We will only process your Personal Data if we have a lawful basis for doing so. Lawful bases for processing include consent, contractual necessity (i.e. processing that is necessary for the performance of a contract with you, such as your user agreement with us that allows us to provide you with the Products) and our “legitimate interests” or the legitimate interest of others (e.g. our users) such as:

- Personalizing, improving or operating the Platform and our business
- Better understanding your needs and interests
- Fulfilling requests you make related to the Platform
- Providing you with information and offers from us or third parties
- Complying with our legal obligations, resolving disputes with users, enforcing our agreements
- Protecting, investigating and deterring against fraudulent, harmful, unauthorized or illegal activity

We process your Personal Data for purposes such as:

- To provide and enroll you in the Platform
- To keep you up to date on the latest announcements, features, updates, upgrades, system enhancements, special offers, and other information
- To understand how the Platform is used
- To diagnose problems with the Platform
- To personalize and send marketing communications to you about the Platform
- To make improvements to the Platform and other Hurify products and services
- To prevent or address service or technical problems
- To provide support and assistance for the Platform
- To provide Customer feedback and support
- To respond to Customer support requests
- To conduct analytics and aggregate statistical analysis
- To transfer to third parties that help us provide the Platform
- To meet contract or legal obligations

User-Generated Information

We collect and retain Personal Data and other information you upload, provide, or create while using the Platform (“User-Generated Information”), including information related to:

- Messages: Message content, sender and recipients, date, time, and read receipts
- Content shared: Files and file names, sizes, and types
- Whiteboards: Whiteboard content, snapshots, and background images

Activity Logs

When you use the "Send Feedback" feature of the Platform or, choose to send a problem report or logs from a device, logs of your activity are automatically shared with us so that we can provide technical

support and make product improvements. In some cases, you may be offered the option to send logs at the end of a specific call following a call failure or a low call rating within the Platform. These logs record information about the participants, date, time, duration, and quality related to your activities with the Platform, as well as hashes (one-way encrypted versions) of messages you've sent or received. If your device is paired with an endpoint, the activity logs from the paired device will also be shared with us. These logs may pertain to other users of the paired device besides you. No content or message text that you send or receive is shared with us, unless you choose to include optional screen shots that display messages or content. The logs are stored unencrypted on your device and, together with screen shots, are sent to us using transport encryption (see next section). Your employer has the ability to share logs with us on demand from any device it administers.

Mobile and Browser Permissions

The Platform makes use of a number of features available on mobile device and web browser platforms to support a full-featured collaboration experience. Depending on which mobile or browser platform you use and which Platform features you use, your application may request or automatically obtain some or all of the following permissions:

- **Calendar and contacts:** the Platform uses calendar and contact information to make it easier for you to connect with contacts and to schedule meetings.
- **Files and photos:** To make it possible for you to share files and photos with other users, the Platform needs permission to access files and photos stored on your device.
- **Push notifications:** You can choose to allow the Platform to notify you about new messages and other activity even when you do not have the Platform application open. User information collected by the Platform is shared with third-party push notification Platforms and mobile operators when users allow push notifications. If you no longer wish to receive these types of communications, you may turn them off at the device level.

Data Subject Rights

You have certain rights with respect to your Personal Data as set forth below. Please note that in some circumstances, we may not be able to fully comply with your requests, or we may ask you to provide us with additional information in connection with your request, which may be Personal Data, for example, if we need to verify your identity or the nature of your request. In such situations, however, we will still respond to let you know of our decision.

To make any of the following requests, contact us using the contact details referred to in the "Contact Us" section of this policy.

- **Access:** You can request more information about the Personal Data we hold about you. You can also request a copy of the Personal Data.
- **Rectification:** If you believe that any Personal Data we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data. You can also correct some of this information directly by logging into your Platform account. Please contact us as soon as possible upon noticing any such inaccuracy or incompleteness.
- **Objection:** You can contact us to let us know that you object to the collection or use of your Personal Data for certain purposes.
- **Erasure:** You can request that we erase some or all of your Personal Data from our systems.
- **Restriction of Processing:** You can ask us to restrict further processing of your Personal Data.
- **Portability:** You have the right to ask for a copy of your Personal Data in a machine-readable format. You can also request that we transmit the data to another entity where technically feasible.
- **Withdrawal of Consent:** If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide

express consent on a case-by-case basis for the use or disclosure of certain of your Personal Data, if such use or disclosure is necessary to enable you to utilize some or all of our products.

- **Right to File Complaint:** You have the right to lodge a complaint about Hurify's practices with respect to your Personal Data with the supervisory authority of your country or EU Member State.

Data Retention

How long we retain your Personal Data depends on the type of data and the purpose for which we process the data.

Cookies and Tracking Technologies

When you use the Platform in your web browser, we Hurify and our partners use cookies or similar technologies to analyze trends, administer the Platform, track users' movements around the website, gather demographic information about our user base as a whole, to ensure that you can stay logged into the Platform until you choose to log out and to improve the performance of the Platform. These technologies may store Registration Information, Host Information, and/or Usage Information. Cookies are always sent using transport encryption. Users can control the use of cookies at the individual browser level. For more information regarding cookies or similar technologies, please review our Cookie Policy ([create hotlink](#)).

Your browser may offer you a "Do Not Track" option, which allows you to signal to operators of websites and web applications and Platforms (including behavioral advertising Platforms) that you do not wish such operators to track certain of your online activities over time and across different websites. Our Platform does not support Do Not Track requests at this time, which means that we collect information about your online activity both while you are using the Platform and after you leave our properties.

Sharing your Personal Data

We do not sell or rent your Personal Data to third parties for marketing purposes unless you have expressly consented to such processing. We may share Personal Data within Hurify and its affiliated companies and with third party Platform providers for purposes of data processing or storage.

We may also share Personal Data with business partners, service vendors, and/or authorized third-party agents or contractors in order to provide a requested product or transaction, including processing orders, processing transactions, hosting websites, hosting event and seminar registration and providing customer support. We provide these third parties with Personal Data to complete/utilize the requested product or transaction.

In some cases, we may choose to buy or sell assets. In these types of transactions, user information is typically one of the transferred business assets. Moreover, if we, or substantially all of our assets, were acquired, or if we go out of business or enter bankruptcy, user information would be one of the assets that is transferred or acquired by a third party. You acknowledge that such transfers may occur, and that any acquirer of us or our assets may continue to use your Personal Data as set forth in this policy. As required by law, Hurify may respond to subpoenas, court orders, or similar legal process by disclosing your Personal Data and other related information, if necessary. We also may use Personal Data and other related information to establish or exercise our legal rights or defend against legal claims.

Hurify may collect and possibly share Personal Data and any other additional information available to us in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of Hurify's terms of service, or as otherwise required by law.

Security of your Personal Data

Hurify is committed to protecting the Personal Data you share with us. We utilize a combination of industry-standard security technologies, procedures, and organizational measures to help protect your Personal Data from unauthorized access, use or disclosure.

We recommend you to take every precaution in protecting your Personal Data when you are on the Internet. For example, change your passwords often, use a combination of letters and numbers when creating passwords, and make sure you use a secure browser.

If you have any questions about the security of your Personal Data, you can contact us at dpo@hurify.co

Transfer and Storage of Personal Data

The Platforms are hosted and operated in the United States (“U.S.”) and the European Union through Hurify and its Platform providers. We may transfer your Personal Data to and from the U.S., to any Hurify affiliate worldwide, or to third parties acting on our behalf for the purposes of processing or storage.

In certain cases, Hurify will transfer Personal Data from the EU in accordance with the European Commission-approved Standard Contractual Clauses, a copy of which can be obtained at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32010D0087>.

Contact Us

California Privacy Rights: Under California Civil Code sections 1798.83-1798.84, California residents are entitled to ask us for a notice identifying the categories of personal customer information which we share with our affiliates and/or third parties for marketing purposes and providing contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this notice, please submit a written request the address below.

To address your individual rights or if you have any privacy-related questions or comments related to this privacy policy, please send an email to dpo@hurify.co . You can also contact us by writing to this address:

Hurify Digital Markets, Inc.
Attention: Data Privacy Officer
10900 NE 4th St, Suite 2300
Bellevue, WA 98004

If you reside in the EU, United Kingdom, Lichtenstein, Norway or Iceland, you can also contact our Data Protection Officer by email at gdpr@hurify.co