What this policy covers

Your privacy is important to us, and so is being transparent about how we collect, use, and share information about you. This policy is intended to help you understand:

- What information we collect about you
- How we use information we collect
- How we share information we collect
- How we store and secure information we collect
- How to access and control your information
- How we transfer information we collect internationally
- Other important privacy information

This Privacy Policy covers the information we collect about you when you use our products or services, or otherwise interact with us (for example, by attending our events), unless a different policy is displayed. Seceon refers to Seceon Inc and any of our corporate affiliates. We offer a range of products we refer to all of these products, together with our other services and websites as "Products" in this policy.

This policy also explains your choices about how we use information about you. Your choices include how you can object to certain uses of information about you and how you can access and update certain information about you. **If you do not agree with this policy, do not access or use our Services or interact with any other aspect of our business.**

Where we provide the Products under contract with an organization (for example your employer) that organization controls the information processed by the Services. For more information, please see Notice to End Users below.

What information we collect about you

We collect information about you when you provide it to us, when you use our Products, and when other sources provide it to us, as further described below.

Information you provide to us

We collect information about you when you input it into the Products or otherwise provide it directly to us.

**Account and Profile Information:** We collect information about you when you register for an account, create or modify your profile, set preferences, sign-up for or make purchases through the Services. For example, you provide your contact information and, in some cases, billing information when you register for the Products and services. We keep track of your preferences when you select settings within the Products.

**Content you provide through our websites:** Our websites either owned or operated by us, collect content that you submit, which may include social media or social networking websites operated by us. For example, you provide content to us when you provide feedback or when you participate in
any requests for content, demos or interactive functions including, surveys, promotions, activities or events where you provide your information in order to participate.

**Information you provide through our support channels:** Requests for our customer support, where you may choose to submit information regarding a problem you are experiencing with a Product. Whether you designate yourself as a technical contact, open a support ticket, speak to one of our representatives directly or otherwise engage with our support team, you will be asked to provide contact information, a summary of the problem you are experiencing, and any other documentation, screenshots or information that would be helpful in resolving the issue.

**Payment Information:** We collect certain payment and billing information when you register for certain paid Services. For example, we ask you to designate a billing representative, including name and contact information, upon registration in order to bill for our SaaS product services. You might also provide payment information, such as payment card details, which we collect via secure payment processing services.

**Information we collect automatically when you use our website and support services**

We collect information about you passively when you interact with us electronically, including browsing our websites and taking certain actions when licensing our products or requesting support services.

**The information we collect:** We keep track of certain information about you when you visit and interact with us. This information includes the licensed products and features you use; the links you click on; the type, size and filenames of attachments you download; frequently used search terms; and the information you provide during support requests.

**Device and Connection Information:** We also collect information through your device about your operating system, browser type, IP address, URLs of referring/exit pages, device identifiers, and other data. We may use your IP address and/or country preference in order to approximate your location to provide you with a better Service experience. How much of this information we collect depends on the type and settings of the device you use to access the Services. Server and data center Service administrators can disable collection of this information via the administrator settings or prevent this information from being shared with us by blocking transmission at the local network level.

**Cookies and Other Tracking Technologies:** Seceon and our third-party partners, such as our advertising and analytics partners, use cookies and other tracking technologies (e.g., web beacons, device identifiers and pixels) to provide functionality and to recognize you across different Services and devices. For more information, please refer to your browser application on how to delete cookies and or keep them from being collected for information on how to control settings of these cookies and tracking technologies.

**Information we receive from other sources**

We receive information about you from other third-party services, from our related companies, and from our business and channel partners.
Other users of the Services: Other users of our Products may provide information about you when they submit content through the Services. For example, an administrator may provide your contact information when they designate you as the billing or technical contact on your company's account.

Seceon Partners: We work with a global network of partners who provide consulting, implementation, training and other services around our products. Some of these partners also help us to market and promote our products, generate leads for us, and resell our products. We receive information from these partners, such as billing information, billing and technical contact information, company name, what Seceon products you have purchased or may be interested in, evaluation information you have provided, what events you have attended, and what country you are in.

Other Partners: We receive information about you and your activities from third-party partners, such as advertising and market research partners who provide us with information about your interest in and engagement with, our Products and online advertisements.

How we use information we collect

How we use the information we collect depends in part on which Products you use, how you use them, and any preferences you have communicated to us. Below are the specific purposes for which we use the information we collect about you.

To provide the products you purchase from us, support and personalize your experience: We use information about you for various purposes, including to process licensing transactions with you, authenticate you when you log in, provide customer support, and operate and maintain the products.

To communicate with you: We use your contact information to send transactional communications via email and if applicable within the product licensing portal, including confirming your purchases, reminding you of subscription expirations, responding to your comments, questions and requests, providing customer support, and sending you technical notices, updates, security alerts, and administrative messages. We send you email notifications when you or others interact with you, for example, when you are @mentioned on a page or ticket or when a task is assigned to you. We also provide tailored communications based on your activity and interactions with us. We also send you communications as you onboard to a particular Service to ensure it has been properly activated. These communications are part of the Product and in most cases you cannot opt out of them. If an opt out is available, you will find that option within the communication itself or in your account settings.

To market, promote and drive engagement from the website contact information you have provided: We use your contact information to send promotional communications that may be of specific interest to you, including by email and by displaying Seceon ads on other companies' websites and applications, as well as on platforms like Facebook and Google. These communications are aimed at driving engagement and maximizing what you get out of our products, including information about new features, survey requests, newsletters, and events we think may be of interest to you. We also communicate with you about new product offers,
promotions and contests. You can control whether you receive these communications as described below under "Opt-out of communications."

**Customer support:** We use your information to resolve technical issues you encounter, to respond to your requests for assistance, to analyze crash information, and to repair and improve the Services.

**For safety and security:** We use information about you and your Product use to verify accounts and activity, to monitor suspicious or fraudulent activity and to identify violations of Service policies.

**To protect our legitimate business interests and legal rights:** Where required by law or where we believe it is necessary to protect our legal rights, interests and the interests of others, we use information about you in connection with legal claims, compliance, regulatory, and audit functions, and disclosures in connection with the acquisition, merger or sale of a business.

**With your consent:** We use information about you where you have given us consent to do so for a specific purpose not listed above. For example, we may publish testimonials or featured customer stories to promote the Products, with your permission.

**Legal bases for processing (for EEA users):**

If you are an individual in the European Economic Area (EEA), we collect and process information about you only where we have legal bases for doing so under applicable EU laws. The legal bases depend on the Products or Services you use and how you use them. This means we collect and use your information only where:

- We need it to provide you the Products or Services, including to operate the Products or Services, provide customer support and personalized features and to protect the safety and security of the Products or Services;
- It satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote the Products or Services and to protect our legal rights and interests;
- You give us consent to do so for a specific purpose; or
- We need to process your data to comply with a legal obligation.

If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we or a third party (e.g. your employer) have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using the Services.

**How we share information we collect**

We share information we collect about you in the ways discussed below, including in connection with possible business transfers, but we are not in the business of selling information about you to advertisers or other third parties.

**Managed accounts and administrators:** If you register or access the Products or Services using an email address with a domain that is owned by your employer or organization, and such organization wishes to establish an account or site, certain information about you including your name, profile
picture, contact info, content and past use of your account may become accessible to that organization’s administrator and other Products or Service users sharing the same domain. If you are an administrator for a particular site or group of users within the Products or Services, we may share your contact information with current or past Products or Service users, for the purpose of facilitating Product or Service-related requests.

Sharing with third parties

We may share information with third parties that help us operate, provide, improve, integrate, customize, support and market our Services.

Seceon Partners: We work with third parties who provide consulting, sales, and technical services to deliver and implement customer solutions around the Services. We may share your information with these third parties in connection with their services, such as to assist with billing and collections, to provide localized support, and to provide customizations. We may also share information with these third parties where you have agreed to that sharing. If a partner needs to access information about you to perform services on our behalf, they do so under close instruction from us, including policies and procedures designed to protect your information.

Links to Third Party Sites: The Products or Services may include links that direct you to other websites or services whose privacy practices may differ from ours. If you submit information to any of those third party sites, your information is governed by their privacy policies, not this one. We encourage you to carefully read the privacy policy of any website you visit.

With your consent: We share information about you with third parties when you give us consent to do so. For example, we often display personal testimonials of satisfied customers on our public websites. With your consent, we may post your name alongside the testimonial.

Compliance with Enforcement Requests and Applicable Laws; Enforcement of Our Rights: In exceptional circumstances, we may share information about you with a third party if we believe that sharing is reasonably necessary to (a) comply with any applicable law, regulation, legal process or governmental request, including to meet national security requirements, (b) enforce our agreements, policies and terms of service, (c) protect the security or integrity of our products and services, (d) protect Seceon, our customers or the public from harm or illegal activities, or (e) respond to an emergency which we believe in good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person.

Sharing with affiliated companies

We share information we collect with affiliated companies and, in some cases, with prospective affiliates. Affiliated companies are companies owned or operated by us. The protections of this privacy policy apply to the information we share in these circumstances.

Business Transfers: We may share or transfer information we collect under this privacy policy in connection with any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company. You will be notified via email and/or a prominent notice on the Services if a transaction takes place, as well as any choices you may have regarding your information.
How we store and secure information we collect

Information storage and security

We use data hosting service providers in the United States, Germany and United Kingdom to host the information we collect, and we use technical measures to secure your data.

While we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that data, during transmission through the Internet or while stored on our systems or otherwise in our care, is absolutely safe from intrusion by others.

How long we keep information

How long we keep information we collect about you depends on the type of information, as described in further detail below. After such time, we will either delete or anonymize your information or, if this is not possible (for example, because the information has been stored in backup archives), then we will securely store your information and isolate it from any further use until deletion is possible.

Account information: We retain your account information for as long as your account is active and a reasonable period thereafter in case you decide to re-activate the Subscription Services. We also retain some of your information as necessary to comply with our legal obligations, to resolve disputes, to enforce our agreements, to support business operations, and to continue to develop and improve our Products and Services.

Information you share on the Products or Services: If your account is deactivated or disabled, some of your information and the content you have provided will remain in order to allow your team members or other users to make full use.

Managed accounts: If the Products or Services are made available to you through an organization (e.g., your employer), we retain your information as long as required by the administrator of your account. For more information, see "Managed accounts and administrators" above.

Marketing information: If you have elected to receive marketing emails from us, we retain information about your marketing preferences for a reasonable period of time from the date you last expressed interest in our Products or Services. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created.

How to access and control your information

You have certain choices available to you when it comes to your information. Below is a summary of those choices, how to exercise them and any limitations.

Your Choices:

You have the right to request a copy of your information, to object to our use of your information (including for marketing purposes), to request the deletion or restriction of your information, or to request your information in a structured, electronic format. Below, we describe the tools and processes for making these requests.
Your request and choices may be limited in certain cases: for example, if fulfilling your request would reveal information about another person, or if you ask to delete information which we or your administrator are permitted by law or have compelling legitimate interests to keep. Where you have asked us to share data with third parties, for example, by installing third-party apps, you will need to contact those third-party service providers directly to have your information deleted or otherwise restricted. If you have unresolved concerns, you may have the right to complain to a data protection authority in the country where you live, where you work or where you feel your rights were infringed.

**Access and update your information:** Some of our Products or Services give you the ability to access and update certain information about you from within the Service. For example, you can access your profile information from your account and search for content containing information about you using key word searches in the Service. You can update your profile information within your profile settings and modify content that contains information about you using the editing tools associated with that content.

**Deactivate your account:** If you no longer wish to use these Products or Services, you or your administrator may be able to deactivate your Services within such an account. If you can deactivate your own account, that setting is available to you in your account settings. Otherwise, please contact your administrator. If you are an administrator and are unable to deactivate an account through your administrator settings, please contact Seceon support. Please be aware that deactivating your account does not delete all of your information, which we may have collected from various means - for more information on how to delete your information, see immediately below:

**Request that we stop using your information:** In some cases, you may ask us to stop accessing, storing, using and otherwise processing your information where you believe we don't have the appropriate rights to do so. For example, if you believe a Product or Services account was created for you without your permission or you are no longer an active user, you can request that we delete your account as provided in this policy. For such requests please contact us as support@seceon.com with the appropriate account information so we can properly address the request. Where you gave us consent to use your information for a limited purpose, you can contact us to withdraw that consent, but this will not affect any processing that has already taken place at the time.

You can also opt-out of our use of your information for marketing purposes by contacting us, as provided below.

**Opt out of communications:** You may opt out of receiving promotional communications from us by using the unsubscribe link within each email, or by contacting us as provided below to have your contact information removed from our promotional email list or registration database. Even after you opt out from receiving promotional messages from us, you will continue to receive transactional messages from us regarding use of our Products or Services Services. You can opt out of some notification messages in your account settings.

You may be able to opt out of receiving personalized advertisements from other companies who are members of the Network Advertising Initiative or who subscribe to the Digital Advertising

**Turn off Cookie Controls:** Relevant browser-based cookie controls are described and accessed through their preferences menu tab or pull down selection

**Send "Do Not Track" Signals:** Some browsers have incorporated "Do Not Track" (DNT) features that can send a signal to the websites you visit indicating you do not wish to be tracked. Because there is not yet a common understanding of how to interpret the DNT signal, our Services do not currently respond to browser DNT signals. You can use the range of other tools we provide to control data collection and use, including the ability to opt out of receiving marketing from us as described above.

**Data portability:** Data portability is the ability to obtain some of your information in a format you can move from one service provider to another (for instance, when you transfer your mobile phone number to another carrier). Depending on the context, this applies to some of your information, but not to all of your information. Should you request it, we will provide you with an electronic file of your basic account information and the information you create under your sole control.

**How we transfer information we collect internationally**

**International transfers of information we collect**

We collect information globally and primarily store that information in the United States. We may also transfer, process and store your information outside of your country of residence, to wherever our third-party channel/service providers operate for the purpose of providing you the Products purchased. Whenever we transfer your information, we take steps to protect it.

**International transfers to third parties:** Some of the third parties described in this privacy policy, which provide services to us under contract, are based in other countries that may not have equivalent privacy and data protection laws to the country in which you reside.

We are subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC).

**Other important privacy information**

**Notice to End Users**

Many of our products are intended for use by organizations. Where the Products or Services are made available to you through an organization (e.g. your employer), that organization is the administrator of the Products or Services and is responsible for the accounts and/or Service sites over which it has control. If this is the case, please direct your data privacy questions to your administrator, as your use of the Products or Services is subject to that organization's policies. We are not responsible for the privacy or security practices of an administrator's organization, which may be different than this policy.

Administrators are able to:

- require you to reset your account password;
• restrict, suspend or terminate your access to the Products or Services;
• access information in and about your account;
• access or retain information stored as part of your account;
• install or uninstall third-party apps or other integrations

In some cases, administrators can also:
• restrict, suspend or terminate your account access;
• change the email address associated with your account;
• change your information, including profile information;
• restrict your ability to edit, restrict, modify or delete information

Even if the Products or Services are not currently administered to you by an organization, if you use an email address provided by an organization (such as your work email address) to access the Products or Services, then the owner of the domain associated with your email address (e.g. your employer) may assert administrative control over your account and use of the Products or Services at a later date. You will be notified if this happens.

If you do not want an administrator to be able to assert control over your account or use of the Products or Services, use your personal email address to register for or access the Services. If an administrator has not already asserted control over your account or access to the Services, you can update the email address associated with your account through your account settings in your profile. Once an administrator asserts control over your account or use of the Services, you will no longer be able to change the email address associated with your account without administrator approval.

Please contact your organization or refer to your administrator’s policies for more information.

**Our policy towards children**

The Products are not directed to individuals under 16. We do not knowingly collect personal information from children under 16. If we become aware that a child under 16 has provided us with personal information, we will take steps to delete such information. If you become aware that a child has provided us with personal information, please contact support@seceon.com

**Changes to our Privacy Policy**

We may change this privacy policy from time to time. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice by adding a notice on the Seceon homepages, login screens, or by sending you an email notification. We will also keep prior versions of this Privacy Policy in an archive for your review. We encourage you to review our privacy policy whenever you use the Products and Services to stay informed about our information practices and the ways you can help protect your privacy.

If you disagree with any changes to this privacy policy, you will need to stop using the Products and deactivate your account(s), as outlined above.

**Contact Us**
Your information is controlled by Seceon Inc. If you have questions or concerns about how your information is handled, please direct your inquiry to Seceon, which we have appointed to be responsible for facilitating such inquiries or, if you are a resident of the European Economic Area, please contact our EU Representative.

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