



3031 Tisch Way, 110 Plaza West, San Jose, CA 95128, USA | (408) 560-0556 | www.netkiller.com

CCPA POLICY
Updated August 8th, 2021

VERSION -1.0

CCPA Compliance Information

1. What Information We Collect About You

Our Use of the Subscription Service

We use our own Subscription Service to build webpages that people can visit to learn more about Netkiller. Information that we collect and manage using the Subscription Service for our own marketing belongs to us and is used, disclosed and protected according to this Privacy Policy.

When You Visit our Websites

You are free to explore the Websites without providing any Personal Information about yourself. When you visit the Websites or register for the Subscription Service, we request that you provide Personal Information about yourself, and we collect Navigational Information.

"Personal Information"

We collect personal information from you when you submit web forms or interact with our Website, for example subscribing to a Netkiller blog, signing up for a webinar, or requesting customer support. We also collect personal information when you sign up for a Netkiller account.

"Personal Information" refers to any information that identifies you personally, including contact information, such as your name, e-mail address, company name, address, phone number, and

other information about yourself or your business. Personal Information can also include information about any transactions, both free and paid, that you enter into on the Websites, and information about you that is available on the internet, such as from Facebook, LinkedIn, Twitter and Google, or information that we acquire from service providers.

Personal Information includes Navigational Information or Payment Information where such information can directly or indirectly identify an individual.

Navigational information refers to information about your computer and your visits to the Websites such as your IP address, geographical location, browser type, referral source, length of visit and pages viewed. Please see the "Use of Navigation Information" section below.

Payment information includes information we collect and process from you when you subscribe to the Subscription Service, including credit card numbers and billing information, using third party PCI-compliant service providers. Except for this, we do not collect other Sensitive Information from you.

"Sensitive Information"

This refers to credit or debit card numbers, financial account numbers or wire instructions, government issued identification numbers (such as Social Security numbers, passport numbers), biometric information, personal health information (or other information protected under any applicable health data protection laws), personal information of children protected under any child data protection laws, and any other information or combinations of information that falls within the definition of "special categories of data" under GDPR or any other applicable law relating to privacy and data protection.

Log Files

When you view content provided by us, we automatically collect information about your computer hardware and software. This information can include your IP address, browser type, domain names, internet service provider (ISP), the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, clickstream data, access times and referring website addresses. This information is used by Netkiller to provide general statistics regarding use of the

Websites. For these purposes, we do link this automatically-collected data to other Personal Information such as name, email address, address, and phone number.

Information we collect from third parties

From time to time, we may receive Personal Information about you from third party sources including partners with which we offer co-branded services or engage in joint marketing activities, and sources such as social media websites.

Information About Children

The Websites are not intended for or targeted at children under 16, and we do not knowingly or intentionally collect personal information about children under 16. If you believe that we have collected personal information about a child under 16, please contact us here, so that we may delete the information. SFA@Netkiller.com

2. How We Use Information We Collect

Compliance with Our Privacy Policy

We use the information we collect only in compliance with this Privacy Policy. Customers who subscribe to our Subscription Services are obligated through our agreements with them to comply with this Privacy Policy.

- We Never Sell Personal Information
- We will never sell your Personal Information to any third party.

Use of Personal Information

In addition to the uses identified elsewhere in this Privacy Policy, we may use your Personal Information to:

- improve your browsing experience by personalizing the Websites;
- develop and improve our products and services;

- send information or Netkiller content to you which we think may be of interest to you by post, email, or other means and send you marketing communications relating to our business;
- promote use of our services to you and share promotional and information content with you in accordance with your communication preferences;
- provide other companies with statistical information about our users -- but this information will not be used to identify any individual user and will only be shared on an aggregate and de-identified basis;
- contact you about billing, account management, and other administrative matters;
- send information to you regarding changes to our Customer Terms of Service, Privacy Policy (including the Cookie Policy), or other legal agreements;
- investigate and help prevent security issues and abuse; or
- meet legal requirements.

We may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, we do not transfer your Personal Information to the third party.

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it. However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information). Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

Use of Navigational Information

We use Navigational Information to operate and improve the Websites and to provide you with a better experience when you interact with Netkiller. We may also use Navigational Information alone or in combination with Personal Information to provide you with personalized information about Netkiller. Navigational Information, such as IP address, is used to approximate your location. For example, we may use your approximate location to provide content that has been translated or send emails at certain times using your local time zone.

You may disable the collection and use of your location data through browser-, operating system- or device-level settings. Consent concerning location data may be withdrawn at any time here.

Customer Testimonials and Comments

We post customer testimonials and comments on our Websites, which may contain Personal Information. We obtain each customer's consent via email prior to posting the customer's name and testimonial.

Use of Payment Information

If you give us Payment information, we use it solely as authorized by you in accordance with this Privacy Policy in order for you to use the Subscription Services, including to check your financial qualifications and collect payment from you. We use a third-party service provider to manage credit card processing. This service provider is not permitted to store, retain, or use information you provide except for the sole purpose of credit card processing on our behalf.

Security of your Personal Information

We use a variety of security technologies and procedures to help protect your Personal Information from unauthorized access, use or disclosure. We secure the Personal Information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. All Personal Information is protected using appropriate physical, technical and organizational measures. For more on Security at Netkiller, please see <https://www.Netkiller.com>

Social Media Features

Our Websites include Social Media Features, such as the Facebook Like button and Widgets, such as the Share Button or interactive mini-programs that run on our sites. These features may collect your IP address, which page you are visiting on our sites, and may set a cookie to enable the feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our Websites. This Privacy Policy does not apply to these features. Your interactions with these features are governed by the privacy policy and other policies of the companies providing them.

External Websites

Our Websites provide links to other websites of third parties. We do not control, and are not responsible for, the content or practices of these other websites. Our provision of such links does not constitute our endorsement of these other websites, their content, their owners, or their practices. This Privacy Policy does not apply to these other websites, which are subject to any privacy and other policies they may have.

Public Forums

We offer publicly accessible message boards, blogs, and community forums. Please keep in mind that if you directly disclose any information through our public message boards, blogs, or forums, this information may be collected and used by others. We will correct or delete any information you have posted on the Websites if you so request, as described in "To Unsubscribe From Our Communications" below.

Retention of Personal 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, then we will securely store your information and isolate it from any further use until deletion is possible.

We retain Personal Information that you provide to us where we have an ongoing legitimate business need to do so (for example, as needed to comply with our legal obligations, resolve disputes and enforce our agreements).

When we have no ongoing legitimate business need to process your Personal Information, we securely delete the information or anonymize it or, if this is not possible, securely store your

Personal Information and isolate it from any further processing until deletion is possible. We will delete this information at an earlier date if you so request, as described in the "How to Access & Control Your Personal Data" below.

If you have elected to receive marketing communications from us, we retain information about your marketing preferences for a reasonable period of time from the date you last expressed interest in our content, products, or services, such as when you last opened an email from us or ceased using your Netkiller account. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created

The data our customers collect by using the Subscription Service is retained according to the relevant agreements with our customers.

3. How we Share Information we Collect

Service Providers

We employ other third-party service providers to provide services on our behalf to visitors to our Websites and our customers and users of the Subscription Service and may need to share your information with them to provide information, products or services to you. We might also share data with third parties but only if the data has been de-identified in a way so it cannot be used to identify you. Examples may include removing repetitive information from prospect lists, analyzing data or performing statistical analysis on your use of the Subscription Service or interactions on our Websites, providing marketing assistance, processing credit card payments, supplementing the information you provide us in order to provide you with better service, developing and improving the product and services, and providing customer service or support. These service providers are prohibited from using your Personal Information except for these purposes, and they are required to maintain the confidentiality of your information. In all cases where we share your information with such agents, we explicitly require the agent to acknowledge and adhere to our privacy and data protection policies and standards.

Netkiller Partners

In addition, we may share data with trusted partners to contact you based on your request to receive such communications, help us perform statistical analysis, or provide customer support. Such third parties are prohibited from using your Personal Information except for these purposes, and they are required to maintain the confidentiality of your information.

We partner with trusted third parties to provide you with co-marketing content that we think may be relevant to you. When you engage with these co-marketing partners, we will tell you who we are sharing data with, and provide a link to the co-marketing partner's privacy policy so you can learn more about how to opt-out of the partner's communications. These co-marketing partners are required to adhere to our privacy and data protection policies. For more information on our co-marketing program, see this page. If you do not want us to share your personal information with these companies, please contact us [here](#).

Corporate Events

If we (or our assets) are acquired by another company, whether by merger, acquisition, bankruptcy or otherwise, that company would receive all information gathered by Netkiller on the Websites and the Subscription Service. In this event, you will be notified via email and/or a prominent notice on our website, of any change in ownership, uses of your Personal Information, and choices you may have regarding your Personal Information.

Compelled Disclosure

We reserve the right to use or disclose your Personal Information if required by law or if we reasonably believe that use or disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or comply with a law, court order, or legal process.

4. How We Transfer Data We Collect Internationally

International Transfers within Netkiller's Entities

To facilitate our global operations, we transfer information to either India, South Korea, or the United States and allow access to that information from countries in which the Netkiller affiliated entities have operations for the purposes described in this policy. These entities are all internal, and wholly owned by Netkiller.

Under certain conditions, more fully described on the Privacy Shield website, you may be entitled to invoke binding arbitration when other dispute resolution procedures have been exhausted.

5. Cookies and Similar Technologies

Cookies

Netkiller and our partners use cookies or similar technologies (such as web beacons and JavaScript) to analyze trends, administer the website, track users' movements around the website, and to gather demographic information about our user base as a whole. To find out more about how we use cookies on our Websites and how to manage your cookie preferences please see our Cookie Policy.

Navigational Information Collected by Our Customers

Our customers can use the tools we provide, as well as tools provided by third parties, to collect Navigational Information when you visit their webpages on the Subscription Service. Netkiller does not control our customers' use of these tools, nor do we control the information they collect or how they use it.

Flash Cookies and Other Third Party Tracking Technologies

The Adobe Flash Player (and similar applications) use technology to remember settings, preferences and usage similar to browser cookies but these are managed through a different interface than the one provided by your Web browser. This technology creates locally stored objects that are often referred to as "Flash cookies." Netkiller does not use Flash cookies. However, our customers of our software platform may create pages on the Netkiller platform that employ Adobe Flash cookies. For more information on "Flash cookies" and how you can manage them please visit our Cookie Policy.

Advertising

We partner with a third party ad network to either display advertising on our Web site or to manage our advertising on other sites. Our ad network partner uses cookies and Web beacons to collect information about your activities on this and other websites to provide you targeted advertising based upon your interests. If you wish to not have this information used for the purpose of serving you targeted ads, you may opt-out by using the opt out feature in the ad's opt out area. For help on finding this area, please contact us at SFA@Netkiller.com

Third Party Tracking Technologies

The use of cookies and web beacons by any tracking utility company is not covered by our Privacy Policy or Cookie Policy.

6. How to Access & Control Your Personal Data

Reviewing, Correcting and Removing Your Personal Information

You have the following data protection rights:

You can request access, correction, updates or deletion of your personal information.

You can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information.

If we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

You have the right to complain to a data protection authority about our collection and use of your personal information. Contact details for data protection authorities in the EEA, Switzerland and certain non-European countries (including the US and Canada) are available [here](#).)

To exercise any of these rights, please contact us [here](#) or by mail to Netkiller, Inc. We will respond to your request to change, correct, or delete your information within a reasonable timeframe and notify you of the action we have taken. The address for mail correspondence can be found [below](#).

If you would like to access or control your data with one of our customers or users of the Subscription Service, please contact the customer or user directly. Netkiller acts as a processor for our customers and will work with our customers to fulfill these requests when applicable.

To Unsubscribe From Our Communications

You may unsubscribe from our marketing communications by clicking on the "unsubscribe" link located on the bottom of our e-mails, updating your communication preferences, or by contacting us here or postal mail to

Netkiller, Inc.,

Silicon Valley Office, HQ

3101 Park Boulevard

Palo Alto, CA 94306, USA

Attention: Privacy. Customers cannot opt out of receiving transactional emails related to their account with us or the Subscription Service.

To Unsubscribe From Our Customers' Communications

Our customers are solely responsible for their own marketing emails and other communications; we cannot unsubscribe you from their communications. You can unsubscribe from our customers' marketing communications by clicking on the "unsubscribe" link located on the bottom of their emails, or by contacting them directly.