

# Privacy Policy

## Purpose

Your privacy is important to us. In the regular course of doing business, SailTrust acquires information from clients, consumers and third parties. To better protect your privacy, we provide this Privacy Statement to explain how your information is collected, processed, transferred (both online and off-line), stored, disclosed and the choices you have regarding the way your information is shared. To make this Statement easy to find, we make it available on our homepage.

## Scope

The SailTrust Privacy Statement applies to all SailTrust.io. businesses and all of its corporate affiliates, including subsidiaries (referred to collectively in this Privacy Statement as "SailTrust"). This Privacy Statement is applicable to all information received by SailTrust from its clients, consumers, third parties and any other individuals in electronic or paper format, as part of SailTrust's business operations, including information submitted and collected by, through, or via: (i) an SailTrust website which includes a reference to this Privacy Statement on the applicable homepage; (ii) any software owned, developed, sold or marketed by SailTrust; or (iii) any products or services offered by SailTrust, whether hosted by SailTrust or a third party (collectively, the "Channels" or individually, the "Channel"), and to information collected off-line by SailTrust. SailTrust does not sell or share the Personal Information (defined below) it collects from you with third parties, except as described in this Privacy Statement. This Privacy Statement may be subject to any specific and applicable SailTrust affiliate privacy statement and this Privacy Statement may vary as required by local law.

## Definitions

"Data Subject" means a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.

"Personal Information" means any information that relates to a Data Subject that can be used to identify that individual on its own or in combination with other readily available data.

"Processing" means any operation that is performed upon Personal Information.

"Sensitive Personal Information" means Personal Information regarding an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, data concerning health, sex life or sexual orientation.

## Data Collection

There are a number of ways in which SailTrust may collect Personal Information from you in the course of doing business. Personal Information may be collected if you provide Personal Information in connection with using a Channel, including ordering a product or service, a webinar registration, Channel forms, surveys, product registrations, such as registrations associated with the installation of software, use of online tools or programs, responses to mailed materials, subscription to our newsletter and other publications, participation in contests, telephone calls, Channel forums, message boards, and in person, such as at events. Additionally, we may collect your name, address, contact phone numbers and email address in order to make an inquiry. If you are making a purchase online, we will require your credit/debit card information, expiration date, billing address, shipping address and other related information. You may provide additional Personal Information that you choose to include in an email that you send to us, via a Channel or through a resume you submit in connection with your interest in working for SailTrust; however, we ask that you limit the

amount of Personal Information you provide to SailTrust in these instances to what is reasonably required. You may also provide certain information, that may include Personal Information, to us, such as the products you are using, your company name, your role with your company, customer asset serial number, account name, support case number, system serial number, log files, and other information in connection with a support request for one of our products, or any other information that you provide to SailTrust or we collect during the normal course of doing business. SailTrust may collect aggregate information, that may include Personal Information, from the Channels that customers access or visit through the use of cookies, clear GIFs and website logs, as described below.

**Cookies:** SailTrust may collect information through the use of cookies. A cookie is a small file that a website puts on a user's computer or mobile device. This file identifies specific information about previous visits to the website. The cookie may store the user's country, language, an assigned random session ID, name and address information or the Internet Protocol ("IP") address associated with a user's computer. SailTrust may use cookies for a variety of purposes, including without limitation: (i) to track the number of users to the SailTrust website over time; (ii) to recognize repeat visits to the SailTrust website; (iii) to facilitate online navigation and online shopping; (iv) to track pages visited during a single online session, analyze trends and gather broad demographic information; (v) to adjust the presentation of the SailTrust website to make it more effective; (vi) to store user preferences; (vii) to record session information, user-specific information (such as the pages the user accesses or visits) and past activity at the SailTrust website; (viii) to alert users to new Channels that we think might be of value; and (ix) to market products and services to users. SailTrust may link the non-Personal Information it collects by the use of cookies to specific Personal Information. Some of our partners may use cookies on SailTrust website. However, we may have no access to or control over those cookies and encourage you to refer to the applicable Cookie Policy of the site that you are visiting.

The length of time a cookie will remain on your computer or mobile device depends on whether it is a *persistent* or *session* cookie. Session cookies will only remain on your computer or mobile device until you stop browsing. Persistent cookies remain stay on your computer or mobile device until they expire or are deleted.

You can manage your cookie settings via your web browser application which will allow you to block or limit the use of cookies, including clearing or removing cookies. Consult the help menu of your browser application for details. If you block the use of cookies, you may not be able to use some of the features on the SailTrust website. For additional information regarding SailTrust's use of cookies, please refer to the applicable Cookie Policy of the site that you are visiting.

**Clear GIFs:** Clear GIFs are small graphic images (in GIF or other image format) placed on a webpage, web-based document, or in an email message. Clear GIFs are invisible to the user because they are typically very small (e.g., only 1-by-1 pixel) and either transparent or the same color as the background of the webpage, document or email message. We do not use clear GIFs to collect Personal Information about you. We may, however, use clear GIFs to capture non-Personal Information, such as statistical usage information for pages, features or other elements on the Channels or through SailTrust email messages that are delivered to you. We may correlate this information to a user to personalize user experience and for statistical analysis of user experiences on the Channels or in our emails.

**Website Logs:** SailTrust may collect information in the form of website logs (collectively "Logs"). These Logs are files that record activity on the Channels and gather statistics about users' activities, such as how many users have visited the Channels, how often, how many "hits" a particular webpage has received, type and quality of the user's Internet connection to the Channels, and identification of the user's hardware and software. The entries comprising the Logs may contain IP addresses, user IDs, and identification of the Internet service

provider that provides your connection to the Internet. Generally, we use the Logs to operate and improve the Channels, to identify the popularity of certain features, to assist with internal marketing and demographic studies, and to enable us to assess overall efficiency and activity on the Channels.

### **Purpose for Collection of Personal Information**

SailTrust may process, collect, and disclose your Personal Information with your consent; however, there are several instances where SailTrust can process and disclose your Personal Information without your explicit consent, including the following legal bases:

- The performance of a contract
- Where SailTrust has a legitimate interest in processing the Personal Information
- The processing is necessary or legally required, conducted to protect the public interest, to protect your vital interest or to establish, exercise or defend a legal claim
- The processing of Personal Information that has been made public by the data subject
- The processing or transfer is required by law

SailTrust processes, collects, and discloses your Personal Information for purposes which may include, but are not limited to, the following:

- Process an order you place for a product or service
- Respond to your questions about a product or service
- Provide technical or customer support for a product or service
- Engage in marketing and sales
- Create and maintain reseller partnerships
- Conduct research and development
- Undertake product development
- To detect and prevent fraud
- To verify your identify

### **Disclosure of Personal Information to Third Parties**

SailTrust may share your information, including Personal Information, within SailTrust or with any unaffiliated third party, including, for example, our payment processing providers, website analytics companies, and CRM service providers. In addition, SailTrust may share such information with its partners, including independent vendors, suppliers, licensors, contractors, distributors and other parties who have a business relationship or a potential business relationship with SailTrust.

*Fulfillment of Products and/or Services Provided by or for SailTrust:* SailTrust may retain other companies and individuals to perform certain functions on our behalf. Examples include, but are not limited to: (i) companies that host or help to administer the Channels; (ii) companies that help to process an order for a product, which may include completing the order; (iii) companies that provide payment and billing services; (iv) companies that conduct surveys or assist SailTrust in its promotional activities such as contacting you by email or over the telephone; (v) third party advertisers or promotional partners who provide a product or service to you; (vi) customer support specialists; (vii) web hosting and Internet service providers; and (viii) data analysis firms. Any such third parties who are involved in these activities are authorized to use the information that is collected by and/or disclosed to them for purposes of fulfilling their contractual obligations to SailTrust, fulfilling any obligations owed to you and to the other individuals who access and use the Channels or services, or as otherwise permitted in this Privacy Statement. SailTrust requires that any such third parties protect the

confidentiality of Personal Information they collect or have access to in the course of their engagement with SailTrust.

**Marketing Materials:** From time to time, SailTrust may share your Personal Information with other companies, so that these third parties may provide you with a special offer or promotion that we think you may find valuable. Unless you specifically tell us that you do not want to receive these special offers, we may share your Personal Information. See how you can opt-out below, to tell us that you do not want us to share your Personal Information for these purposes.

**Sale or Transfer of Information:** In the event of a merger, acquisition, spin-off or other transaction related to SailTrust, a SailTrust business unit or a portion of SailTrust's assets, SailTrust may transfer the information collected from you, including Personal Information, to the surviving party, acquiring party or other party related to the transaction.

**Compliance with Law and Fraud Protection:** SailTrust reserves the right to disclose the information it collects from you if SailTrust believes in good faith that such disclosure is necessary to comply with applicable law or a legal process, to avoid liability for SailTrust and/or its agents and partners, and/or to protect the rights and property (including intellectual property) of SailTrust and others, including SailTrust's agents, partners and customers. Further, SailTrust may disclose the information it collects if SailTrust suspects that an individual or entity has provided fraudulent or illegal information, has committed an illegal, fraudulent or wrongful act or omission, has attempted to pose as someone else, or has attempted an unauthorized use or access of any computer system or website.

### **How You Can Opt-Out**

You have choices about how your Personal Information is used by SailTrust and shared with third parties. For any commercial emails that you receive from SailTrust, you have the option to unsubscribe from those messages by following the instructions in the applicable email. You may also opt-out by sending an email [info@sailtrust.io](mailto:info@sailtrust.io) by including in the subject line of your message, "Remove "SailTrust". Please note that if you unsubscribe, but later request to receive commercial emails from SailTrust, you will receive these commercial emails and be subject to this Privacy Statement, but will continue to have the right to unsubscribe again if you desire.

If you do not want SailTrust to share your Personal Information with third parties so that they may send you information concerning products or services that we believe may be of interest, you may opt-out by sending an email to [inof@sailtrust.io](mailto:inof@sailtrust.io) by including in the subject line of your message, "Remove Third Parties".

Please note that your opt-out rights only apply as described above. SailTrust may still process and disclose your information as described in this Privacy Statement. In addition, if your information already has been shared with a third party, like an SailTrust partner, and you no longer wish to receive commercial emails from that party, you must follow the unsubscribe instructions from the applicable third party. Please reference the section titled, Disclosure of Personal Information to Third Parties above for more information.

### **Our Commitment to Child's Data**

Protecting the privacy of the young is especially important. For that reason, we do not collect or maintain information through the Channels from those we actually know are under 13, and no part of the Channels are structured to attract anyone under 13. If SailTrust becomes aware that any person submitting Personal Information to us is under the age of 13, we will delete that Personal Information.

### **Security**

While SailTrust cannot guarantee complete security of the information we collect from you, we have implemented technical and organizational measures to aid in the prevention of unauthorized access to, and improper use of, loss, disclosure, alteration or destruction of the information we collect from you and to aid in the accurate maintenance of this information. You should be aware, however, that SailTrust has no control over the security of other websites or services on the Internet that you might visit even when a link may appear to direct you to websites and services from SailTrust. We want you to feel confident using the Channels; however, no system can be completely secure. Therefore, although we take commercially reasonable steps to secure your information, we do not promise, and you should not expect, that your Personal Information, other communications or content always will remain secure.

### **Data Integrity and Purpose Limitation**

SailTrust will use Personal Information only for the purpose in which it was collected from you. SailTrust will have steps in place to ensure that the Personal Information is used for its intended use, and is accurate, complete and up to date. SailTrust will also ensure that the Personal Information is only stored for the time needed to fulfil its purpose. This obligation does not prevent SailTrust from processing Personal Information for longer periods for the time and to the extent such processing reasonably serves the purposes of archiving in the public interest, journalism, literature and art, scientific or historical research, and statistical analysis.

### **Choice**

If personal data covered by this Privacy Policy is to be used for a new purpose that is materially different from which the personal data was originally collected or subsequently authorized or is to be disclosed to a non-agent 3<sup>rd</sup> party in a manner not specified in this policy, SailTrust will provide you with an option to choose whether to have your personal data used or disclosed. Requests to opt out of such uses or disclosures of Personal Information should be sent via the processes provided in the Individual Rights section.

### **Individual Rights to Access, Correct, Delete or Limit the Use & Disclosure of Your Personal Information**

SailTrust. In addition, individuals can request that SailTrust limits the use of you personal information and limit its disclosure of personal information. If you would like to make a request to delete, correct, access or limit your data disclosure please contact SailTrust via email below:

EU residents may exercise the right to know, access, or deletion of personal information via the link below:

**E-Mail: [info@sailtrust.io](mailto:info@sailtrust.io)**

You may correct factual errors in your Personal Information by sending us a request that credibly shows error. SailTrust reserves the right to verify your identity before granting access to Personal Information or making corrections and reserves the right to deny access to anyone who does not confirm their identity to SailTrust's satisfaction.

### **California Residents**

The California Consumer Privacy Rights Act ("CCPA") as amended by the California Privacy Rights provides California residents with the following rights:

- To know what personal information has been collected over the past 12 months
- To access personal information we have collected

- To delete personal information (with exceptions) we have collected
- To not be discriminated against if these privacy rights are exercised

California residents may exercise the right to know, access, or deletion of personal information via the email below:

**E-Mail: [info@sailtrust.io](mailto:info@sailtrust.io)**

We are required to verify your request prior to fulfilling it and are committed to fulfilling verified requests within 45 days of the request.

SailTrust does not sell any of the Personal Information we collect about you.

US Residents

US residents may exercise their right know, access, or deletion of personal information where it is applicable via the email below:

**E-Mail: [info@sailtrust.io](mailto:info@sailtrust.io)**

Please enter in the subject line, "Data Subject Request".

### **Privacy Statement Updates**

SailTrust may revise its Privacy Statement from time to time. Please revisit this site on a regular basis to check for any revisions and SailTrust's then-current Privacy Statement. When we post changes to this Privacy Statement, we will revise the updated date at the bottom of this Privacy Statement.

**Updated April 2025.**