

## **Privacy**

## **Nubeva Privacy Policy**

The privacy of your data is a big deal to us. That's why your packet traffic stays in your own data plane, in your own cloud subscriptions. We log all access Nubeva accounts by IP address, so we can always verify that no unauthorized access has happened for as long as the logs are kept.

# **Identity & Access**

When you visit our website we track your interactions with cookies and other technologies to distinguish you from other users of our sites. This helps us provide you with a good experience as you browse and it lets us improve our site.

When you sign up for Nubeva, we ask for some general information like your name, company, and email address. This lets us personalize your new account and send you invoices, updates, or other essential information. We will never sell your personal info to third parties.

When you write to Nubeva with a question or to ask for help, we keep that correspondence, and the email address, for future reference. When you browse our website or marketing pages, we track interactions for statistical purposes (like conversion rates and to test new designs). We may use cookies. We also store any information you volunteer, like surveys, chats, and form completions for as long as it makes sense.

#### The only times we will ever share your information:

- To provide you with products or services in which you've expressed an interest.
- To investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Terms of Service, or as otherwise required by law.
- If Nubeva is acquired by or merged with another company, we will notify you well before any information about you is transferred and becomes subject to a different privacy policy.

### The Data We May Collect From You

When you use the Nubeva websites or Nubeva application, when you contact us by email, social media, text/sms, telephone or other method, we may collect and process the following data about you. Information you give us, including:

- Forms filled out by you on the Site;
- Content of correspondence with us by phone, e-mail or otherwise;

- Site registration;
- Subscriptions or orders placed on the Site;
- Participation in discussion boards, support or other social media functions on the Site;
- Entering a competition, promotion or survey;
- If applicable, resume, work history, CV, resume or other job application information;
- Reporting a problem or requesting support for the Site.

The information you give us may include your name, address, e-mail address and phone number, date of birth, payment information, personal description, photographs or images or comments.

• Information we collect about you.

With regard to each of your visits to our Site we may automatically collect the following information:

- Technical information, including IP address, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- Information about your visit, including the full URL clickstream to, through and from our Site (including date and time);
- Pages you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

We may also collect information our about your devices (including phones, computers or other devices) where you access and visit our Sites. Such information may include unique device identifiers and mobile network information (including phone number), IP address, language and time zone, operating system, hardware version, device locations (including specific geographic locations, such as through GPS, Bluetooth or WiFi signals).

#### INFORMATION WE COLLECT FROM OTHER SOURCES

We also work with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, social networks such as Facebook, Twitter and LinkedIn, search information providers, credit reference agencies, third parties who enable sign on functionality and social network integration) and may receive information about you from them.

If you choose to use features on this Site or other Nubeva Sites that connect to your online profiles, accounts or services (including social media accounts) ("Connected Accounts"), we may collect any information that you permit through your settings on those Connected Accounts. Information we receive from Connected Accounts may include email address, first and last name, location (hometown and country), gender, date of birth, likes, posts or other social activity. Please review your Connected Account privacy settings to control what information is provided to us through this option.

If you are applying for a job at Nubeva, we may use information you provide to communicate with third parties regarding your application to the extent permissible by law.

### HOW YOUR INFORMATION MAY BE USED

We may use information held about you in the following ways:

- To help us respond to your queries;
- To provide you with information on the relevant Nubeva or Nubeva partner product or service:
- To provide you, or permit selected third parties to provide you, with information about other goods and services we offer that are similar to those that you have already purchased or enquired about or that we feel may interest you;
- To make suggestions and recommendations to you and other users of our Site about goods or services that may interest you or them;
- To provide or permit third parties to provide targeted advertising via websites you visit about goods or services that you may find interesting (see more on this in our Cookies Policy below);
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- To track the progress and number of entries in competitions and promotions.
- To allow you to interact with our Site, for example by posting comments or to share information from our Site on third party social media platforms;
- To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- To manage your access to the services or notify you about changes to the services;
- To comply with legal and regulatory requirements;
- To administer our Sites and applications and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To improve our Sites and applications to ensure that content is presented in the most effective manner for you and for your computer or device;
- As part of our efforts to keep our Sites and applications safe and secure;
- If you have applied for a job at Nubeva, to review, verify, and evaluate your job application information.

We may combine information we receive from other sources with information you give to us and information we collect about you (including information in relation to your devices). We may use this combined information for the purposes set out above.

#### DISCLOSURE OF YOUR INFORMATION

We may share your personal data with any Nubeva Company and with selected third parties including:

• Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you in order to provide you with a product or service;

- Business partners, suppliers and sub-contractors to provide you with information about promotions and offers;
- Analytics and search engine providers that assist us in the improvement and optimization of our Sites and applications;
- Third parties when you consent to or request such sharing.

#### **COOKIES**

Our Site uses cookies and other tracking technologies to distinguish you from other users of our Site. This helps us to provide you with a good experience when you browse our Site and also allows us to improve our Site. For detailed information on the cookies and other technologies we use and the purposes for which we use them see our Cookies Policy below.

SOCIAL MEDIA AND OTHER Third Parties That Provide Content or Functionality on Our Services

Some of the content, advertising and functionality on our Site may be provided by third parties that are not affiliated with us. For example, you may have the opportunity to log in to our Site using sign-in services such as Google, Azure or an Open ID provider. These services will authenticate your identity and provide you the option to share certain personal data with us.

# **Your Rights With Respect to Your Information**

Your rights include:

- Right of Access. This includes your right to request a report about the personal information we gather about you and how that information is used and stored.
- Right to Correction. This is your right to request correction of your personal information, in writing, to Nubeva.
- Right to Erasure. This is your right to request, subject to certain limitations under applicable law, that your personal information be erased from our possession (also known as the "Right to be forgotten"). However, if applicable law requires us to comply with your request to delete your information, fulfillment of your request may prevent you from using Nubeva services and may result in closing your account.
- Right to Complain. You have the right to make a complaint regarding our handling of your personal information with the appropriate supervisory authority.
- Right to Restrict Processing. This is your right to request restriction of how and why your personal information is used or processed, for example, opting out of email newsletters but not product update emails
- Right to Object. This is your right, in certain situations, to object to how or why your personal information is processed.
- Right to Portability. This is your right to receive the personal information we have about you and the right to transmit it to another party.
- Right to not be subject to Automated Decision-Making. This is your right to object and prevent any decision that could have a legal, or similarly significant, effect on you from being made solely based on automated processes. This right is limited, however, if the

decision is necessary for performance of any contract between you and us, is allowed by applicable European law, or is based on your explicit consent.

Many of these rights can be exercised by signing in and directly updating your account information. If you have questions about exercising these rights or need assistance, please contact us at support@nubeva.com.

#### Law Enforcement

Nubeva will not share your data with law enforcement unless a court order says we have to. We reject requests from local and federal law enforcement when they seek data without a court order. Unless we are legally prevented from doing so, we will always inform you when such requests are made

## **Security & Encryption**

All data is encrypted via <u>SSL/TLS</u> when transmitted from our servers to your browser, as well as all agent control-plane data. The database backups are also encrypted. No user credentials or passwords are stored on our system either.

#### **Deleted Data**

When you cancel your account, we'll ensure that nothing is stored on our application servers past 30 days except as required by laws and regulations or to meet billing and financial reporting requirements. Certain accounting and CRM information may be preserved for historical, regulatory reporting and marketing purposes in our back office, marketing, CRM or finance systems. Anything you delete on your account while it is active is non-recoverable.

#### **Location of Site and Data**

This website and application Site is operated in the United States. If you are located in the European Union or elsewhere outside of the United States, please be aware that any information you provide to us will be transferred to the United States. BY USING OUR WEBSITE, APPLICATION(S), PARTICIPATING IN ANY OF OUR SERVICES AND/OR PROVIDING US WITH YOUR INFORMATION, YOU CONSENT TO THIS COLLECTION AND TRANSFER OF DATA.

#### **Changes & Questions**

Nubeva may update this policy occasionally, but we'll notify you about significant changes by emailing the account owner or by placing a prominent notice on our site. You can access, change or delete your personal information at any time by contacting <u>our support team</u>.

Questions about this privacy policy? Please get in touch and we'll be happy to answer them!

#### **Cookies Policy**

# INFORMATION ABOUT OUR USE OF COOKIES AND TRACKING TECHNOLOGIES

Our Site uses cookies and other similar technologies (as described below) to distinguish you from other users of our Site. This helps us to provide you with a good experience when you browse our Site, allows us to improve our Site and provide you with tailored content and marketing.

A cookie is a small file of letters and numbers that we store in your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

You can find more information about the types of cookies we use and the purposes for which we use them in the table below:

Type of Cookie	Purpose of Cookie
Strictly Necessary	These cookies are essential in order to enable you to browse our Site and use its features. The information collected by these cookies relate to the operation of our Site, for example website scripting language and security tokens to maintain secure areas of our Site.
Performance / Analytics	These cookies collect anonymous information about how you use our Site, for example which pages you visit most often, whether you receive any error messages, and how you arrived at our Site. Information collected by these cookies is used only to improve your use of our Site and never to identify you. These cookies are sometimes placed by third-party providers of web traffic analysis services, such as Google Analytics.
Functionality	These cookies remember choices you make, for example the country you visit our Site from, your language and any changes you have made to text size or other parts of web pages that you can customize, in order to improve your experience of our Site and to make your visits more tailored and enjoyable. The information these cookies collect may be anonymized and cannot be used to track your browsing activity on other websites.
Targeting or Advertising	These cookies collect information about your browsing habits and inferred interests in order to make marketing from Nubeva more relevant to you. They are also used to limit the number of times you see an advert, as well as to measure the effectiveness of a marketing campaign.
Social Media	These cookies allow you to share what you've been doing on our Site with social media organizations such as Facebook and Twitter. These cookies are not within our control. Please refer to the privacy policies of these organizations for how their cookies work.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

## We may use cookies:

- to collect anonymized data on users' behavior on the site. We may also capture what site a user has come from and what site they go to and also some demographic data (e.g. the user's location) and we may use that data to analyze user behavior across multiple sites;
- to categorize pools of users (on an anonymized basis) based on demographic and/or behavioral data and use this to,
  - target our marketing to cookie-ed users on third party websites and Nubeva websites, and
  - use that data to allow targeted third party advertising to categorized cookie-ed users in respect of advertising placement Nubeva has bought/placed and targeted to users on behalf of third parties

To check your personal privacy settings with Google or to opt-out of the use of this Google AdSense cookies, visit Google's Advertising and Privacy page: http://www.google.com/privacy\_ads.html.

Most internet browsers are automatically set up to accept cookies. However, if you want to refuse or delete any cookies (or similar technologies), please refer to the help and support area on your internet browser for instructions on how to block or delete cookies. Please note you may not be able to take advantage of all the features of our Site, including certain personalized features, if you delete or disable cookies.

For more information on managing cookies, please go to <u>www.allaboutcookies.org</u>, or visit <u>www.youronlinechoices.eu</u> which has further information about behavioral advertising and online privacy.

#### Web Beacons

We, or our third party partners, may employ a software technology called web beacons (also known as clear gifs or pixels) which helps us understand what content is effective; for example by counting the number of users who have visited these pages, and to understand usage patterns. Web beacons are tiny graphics with a unique identifier, similar in function to cookies, and are used to let us know when content is viewed. In contrast to cookies, which are stored on a user's computer hard drive, web beacons are embedded on web pages, ads, and e-mail. We, or our third party partners, may tie the information gathered by web beacons to the other information we collect about you.

In addition to disabling cookies and other tracking technologies as described above, you may opt-out of receiving targeted advertising from participating ad networks, audience segment

providers, ad serving vendors, and other service providers by visiting websites operated by the <u>Network Advertising Initiative</u>, <u>Digital Advertising Alliance</u>, or <u>European Interactive Digital Advertising Alliance</u>