# Salestratus Global Privacy Policy

## Who are we?

Salestratus SAS and it's Certified Solutions Partners, Cadmium Creative Designs sarl, Palladium Marketing LLC, Department of Creative LLC and Selenium Marketing Ltd., (collectively, **"Salestratus"** or **"We"**) respect your privacy, whether you are a Salestratus<sup>™</sup> or Salestratus<sup>™</sup> Spark client, one of our client's customers or users, or an individual visiting one of our websites, and We are committed to protecting your personal information and we want you to be confident that your personal information is safe and secure with us. The use of personal information collected through our services shall be limited to the purpose of providing the service for which our Customers have engaged Salestratus.

This policy describes our practices in connection with information that we collect, through our web-based and mobile software applications and services (collectively, our "**Applications**"), through our Websites , as well as through HTML-formatted email messages that we send to you (collectively, including the Websites and the Applications, our "**Services**").

# What personal information we collect?

Salestratus, and our Clients that use our Services to gather information from meetings and events, may collect several types of information from and about End-Users, including:

"**Personal Information**" that identifies a Client or an End-User as an individual or relates to an identifiable person. For example, this includes name, organization, title, postal address, e-mail address, telephone number, fax number, or other identifiers by which Clients and End-Users may be contacted online or offline. This also may include information that permits Clients to purchase products or services from Salestratus, such as credit or debit card number, or other payment account number, as well as applicable expiration dates and billing/shipping addresses;

"**Other Information**" that does not reveal a person's identity or directly relate to an individual, on its own or in combination with other information we have collected, such as browser and device information, operating system, device type, system and performance information, app usage data, information collected through cookies, pixel tags and other technologies.

Salestratus may also collect Personal Information and Other Information from Clients and Website Visitors. In some instances, we may combine Other Information with Personal Information (such as combining a Website Visitor's name with information we gather about this individual's use of the Websites). If we combine any Other Information with Personal Information, the combined information will be treated by us as Personal Information as long as it is combined.

## How we collect your personal information?

We collect information in the following ways:

Directly from individuals when they provide it to us.

Automatically from Clients as they use our Applications

Automatically from Website Visitors as they navigate through Salestratus Websites and submit or register their contact details.

Information collected automatically may include browser and device information, details regarding use of the Services, IP addresses and information collected through cookies.

### Information Provided to Us.

The information we collect through our Services may include:

Information that a person provides when one of our Clients uses our Applications, for instance at the time a Client collects information from an attendee at a meeting or event, or downloads a mobile software application to the Client's End-User's iOS or Android device

Information that Website Visitors provide by filling in forms on our Websites. This includes information provided at the time of registering to receive product information or white papers, attend online demos, or access other special content on our Websites.

Information that Customers and their End-Users provide when receiving technical or customer account support. This includes records and copies of Customer and End-User correspondence (including e-mail addresses).

Details of transactions Customers carry out through our Applications and of the fulfillment of Customer orders.

Records of search queries on our Services.

# How we use your personal information?

We may use your personal information:

To provide our Clients using our Applications with information, products, or services they request from Salestratus, for example training and guidance on setting up, customising, reporting and exporting data collected using our Services

To manage Application accounts, provide customer service, and process payments for purchases by our Clients.

To provide Customers with notices about their Salestratus accounts, including expiration and renewal notices.

To notify Clients and End-Users about changes to our Services, any products or services we offer or provide though our Services, our terms and conditions applicable to the Services, or this Privacy Policy.

To communicate with Clients and Visitors by e-mail, postal mail, telephone and/or mobile devices about products or services that may be of interest and that are offered by us, our affiliated companies or other third parties.

To allow Customers and Visitors to participate in online product demos, access and download materials, and use other interactive features on our Services.

To better tailor Website experience to Visitors interests, Application experience to End-User or Customer interests, and display content according to user preferences.

To perform research and analyze use of, or interest in, our products, services or content on our Website

For our business purposes, such as data analysis, audits, fraud monitoring and prevention, developing new products, enhancing, improving or modifying our Services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

To present our Services and their contents.

We may also use contact information of Customers and Visitors to contact them via email, telephone or direct mail about products and services that may be of interest to them. Where required, we will seek and obtain recipients' express authorization before we send marketing emails.

As we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to carry out our obligations and enforce our terms and conditions applicable to the Services and other agreements, including for billing and collection purposes; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; (g) to allow us to pursue available remedies or limit the damages that we may sustain; and (h) to protect against or identify fraudulent transactions. This includes exchanging information with other companies and organizations where reasonably necessary for the purposes of fraud protection and credit risk reduction.

In any other way we may describe when you provide the information.

To fulfill any other purpose for which you provide it or with your consent.

Who do we share your personal information with?

We may disclose Personal Information that we collect or is provided to us as described above in this Privacy Policy:

To our Certified Solutions Partners for the purposes described in this Privacy Policy, including but not limited to the providing Services to our Clients and End Users. Salestratus SAS is the party responsible for the management of the jointly-used Personal Information.

To contractors, service providers, and other third parties as reasonably necessary or prudent to provide, maintain and support our Services, such as, for example, payment processors, or Web hosting providers.

This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any site or service to which the Services or this Policy link. The inclusion of a link on the Services or within this Policy does not imply endorsement of the linked site or service by us or by our affiliates.

To a third party in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of Salestratus SAS assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which Personal Information held by Salestratus about our Website Visitors, Clients and End-Users is among the assets transferred.

### What Cookies do we use?

A cookie is a very small text file placed on your computer or device. Cookies help us to:

- 1. understand browsing habits on our Websites;
- 2. understand the number of visitors to our Websites and the pages visited

# How safe is your information?

We seek to use reasonable organisational, technical and administrative measures to protect Personal Information within Salestratus and the Certified Solutions Partners group. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with Us has been compromised), please immediately notify us of the problem by contacting Us in accordance with the "Contact Information" section below. How long do we keep your personal information?

We will retain Personal Information we process on behalf of our Clients for as long as needed to provide Services to our Clients. Salestratus will retain this Personal Information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

# Data subject rights

You (defined as the Data Subject under GDPR) have certain rights under existing data protection legislation including the right to request a copy of the personal information Salestratsu holds about you, if you request it from Us in writing.

From May 25<sup>th</sup> 2018 you, the Data Subject, will have the following rights:

<u>Right to access</u>: the right to request copies of your personal information from Us;

<u>Right to correct</u>: the right to have your personal information rectified if it is inaccurate or incomplete;

<u>Right to erase</u>: the right to request that we delete or remove your personal information from our systems;

<u>Right to restriction of processing</u>: the right to 'block' Us from using your personal information or limit the way in which We can use it;

<u>Right to data portability</u>: the right to request that we move, copy or transfer your personal information;

<u>Right to object</u>: the right to object to our use of your personal information including where we use it for our legitimate interests or where we use your personal information to carry out profiling to inform our business efficiency.

To make enquiries, exercise any of your rights set out in this Privacy Policy and/or make a complaint please contact Us in accordance with the "Contact Information" section below.

If you are not satisfied with the way any complaint you make in relation to your personal information is handled by Us then you may be able to refer your complaint to the relevant data protection regulator for your country and jurisdiction (commonly the Information Commissioner's Office).

**Contact information** 

### For Individuals who are Customers of our Clients:

Salestratus collects and stores information under the direction of its Clients, and has no direct relationship with the their customers and individuals whose Personal Information it processes.

If you are a Customer of one of our Clients and would no longer like to be contacted by one of our Clients that use our Service, please contact the Client that you interact with directly. We may transfer Personal Information to companies that help us provide our Service. Transfers to subsequent third parties are covered by the service agreements with our Clients.

An individual who seeks access, or who seeks to correct, amend, or delete inaccurate Personal Information should direct his query to our Client who is the Data Controller. If requested to remove Personal Information by our Client, we will respond within a reasonable timeframe.

### For Clients of Salestratus

Salestratus SAS (808 392 666 RCS LORIENT) is the Data Controller in relation to the processing of the personal information that you provide to us when you use our Services. Its registered address is 23, Quelisoy Village - 56260 Larmor Plage – France

### Contact details

To make enquiries, exercise any of your rights set out in this Privacy Policy and/or make a complaint please write to Data Protection Officer using the email address Support@salestratus.com

# **Changes to this Privacy Policy**

We reserve the right to amend or modify this Privacy Policy to reflect changes to our information practices. The date of the most recent update will appear at the end of this Policy document.

If we make any material changes we will notify you by means of a notice on this Website thirty (30) days prior to the changes becoming effective, or by email (sent to the e-mail address specified in your account) seven (7) days prior to the changes becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

### Last updated November 2018