

**PRIVACY POLICY**  
(effective as of November 1, 2019)  
Page 1 of 2

Your privacy is important to us. This Privacy Policy explains the personal data we collect, how we process it, and for what purposes. References to our products in this Privacy Policy include our services, websites, apps, software, databases, and servers. This Privacy Policy applies to the interactions we have with you through our website, the products your organization may license from us or from our authorized distributors, and any other interactions we may have with you.

**1. PERSONAL DATA WE COLLECT.**

1.1. We collect data from you through our interactions with you and through our products. You provide some of this data directly, and we get some of this data by collecting data about your interactions, use, and experiences with us and our products. The data we collect depends on the context of your interactions with us and the products and features you use. We also obtain data about you from third parties.

1.2. When we ask you to provide personal data, you can decline. Our products may require some personal data from you to provide you with a product, service, or specific feature. If you choose not to provide data required to provide you with a product, service, or specific feature, you cannot use that product, service, or feature. Where we need to collect personal data by law or to enter into or carry out a contract with you, and you do not provide the data, we will not be able to enter into the contract; or if the required data relates to an existing product, service, or specific feature you're using, we may have to suspend or cancel the product, service, or specific feature.

1.3. When providing the data is optional, and you choose not to share personal data, features like personalization that use such data will not work for you.

**2. HOW WE USE PERSONAL DATA**

2.1. We use and share data to (a) provide our products, including updating, securing, and troubleshooting, as well as providing support, develop and improve our products, personalize our products and make recommendations, advertise and market to you (which includes sending promotional communications, targeting advertising, and presenting you with relevant offers). We also use the data to operate our business, which includes analyzing our performance, meeting our legal obligations, developing our workforce, and doing research. When we send communications to you, we use the data we collect to personalize the content of the communication.

2.2. In carrying out these purposes, we combine data we collect in different contexts or obtain from third parties to give you a more seamless, consistent, and personalized experience, to make informed business decisions, and for other legitimate purposes.

**3. REASONS WE SHARE PERSONAL DATA**

We share your personal data with your consent or as required to complete any transaction or provide products that you have requested or authorized. We may share data with our subsidiaries and other affiliates, with vendors working on our behalf, when required by law, or when reasonably required to protect our customers, protect lives, maintain the security of our products, protect our rights and property and those of our customers.

**4. HOW TO ACCESS AND CONTROL YOUR PERSONAL DATA**

You can make choices about our collection and use of your data. You can control your personal data that we have obtained, and exercise your data protection rights, by contacting us. In some cases, your ability to access or control your personal data will be limited, as required or permitted by applicable law. How you access or control your personal data will depend on which of our products that you use. For example, you can opt-out of receiving promotional emails, SMS messages, telephone calls, and postal mail from us. You can always contact us at the address in the How to contact us section.

**5. COOKIES AND SIMILAR TECHNOLOGIES**

5.1. Cookies are small text files placed on your device to store data that can be recalled by a web server in the domain that placed the cookie. We use cookies and similar technologies for storing and honoring your preferences and settings, enabling you to sign in, providing interest-based advertising, combating fraud, analyzing how our products perform, and fulfilling other legitimate purposes. We may use "web beacons" to help deliver cookies and

**PRIVACY POLICY**  
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Page 2 of 2

gather usage and performance data. Our websites may include web beacons, cookies, or similar technologies from third-party service providers.

5.2. You have a variety of tools to control the data collected by cookies, web beacons, and similar technologies. For example, you can use controls in your internet browser to limit how the websites you visit are able to use cookies and to withdraw your consent by clearing or blocking cookies.

**6. PRODUCTS PROVIDED BY YOUR ORGANIZATION—NOTICE TO END USERS**

6.1. Our products are intended for use by organizations, such as schools and businesses. If your organization provides you with access to our products, your use of our products is subject to your organization's policies, if any. We are not responsible for the privacy or security practices of our customers, which may differ from those set forth in this Privacy Policy. You should direct your privacy inquiries, including any requests to exercise your data protection rights, to your organization's administrator.

6.2. If you use our products or use an email address to access our products and that product or email address was provided by an organization you are affiliated with, such as an employer or school, that organization can (a) control and administer your product account, including controlling privacy-related settings of the product or product account and (b) access and process your data, including the interaction data, diagnostic data, and the contents of your communications and files associated with our product and product accounts.

6.3. If you lose access to your work or school account (in event of change of employment, for example), you may lose access to products and the content associated with those products, including those you acquired on your own behalf, if you used your work or school account to sign in to such products.

**7. ACCOUNT CREDENTIALS.**

Personal data associated with the account you use to login to our products may include credentials, name and contact data, payment data, device and usage data, and information about your interactions with our products. Signing in to your account enables personalization and consistent experiences across products and devices, permits you to use cloud data storage, allows you to make payments using payment instruments stored in your account, and enables other features.

**8. GENERAL.**

When you engage with our sales professionals, we collect name and contact data, along with information about your organization, to support that engagement. When you interact with our support professionals, we collect device and usage data or error reports to diagnose and resolve problems. When you pay for our products, we collect contact and payment data to process the payment. When you engage with our professional services professionals, we collect the name and contact data of the customer's designated point of contact and use information provided by the customer to perform the services that the customer has requested.

**9. HOW TO CONTACT US**

If you believe that we are not adhering to our privacy or security obligations, you may email us at [helpdesk@torrentialdata.com](mailto:helpdesk@torrentialdata.com). You may also send us correspondence at our mailing address is:

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Virginia Beach, VA 23452  
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