

## **PRIVACY POLICY**

Your privacy is important to us. Therefore, we are committed to respecting your privacy and the confidentiality of your personal data and content. This Privacy Policy is designed to assist you in understanding how we use and safeguards the information you provide in using our products. In this Privacy Policy, our “Products” means our products and services, including those provided through our website, and “Personal Data” means any information that we possess relating to an identified or identifiable user of our products

### **1. WHAT INFORMATION DO WE COLLECT?**

In order to provide you with use of our products, we may gather and process some or all of the following information:

- **Content:** any information that is collected from or stored by you when you use our products, other than Registration Information, Customer Service Communications or Log Information.
- **Registration Information:** any information provided when voluntarily registering for use of our products, including, but not limited to, username and password and email address.
- **Customer Service Communications:** any information that is reported to us about the operation of our products, including bug reports or requests for enhancements.
- **Log Information:** When you use some products, our servers automatically record basic information that your application sends. These server logs may include information such as your message, Internet Protocol address, other addressing information, the date and time of your request and an authentication token used to validate the identity of you and your computer.

### **2. HOW DO WE USE THIS INFORMATION AND FOR WHAT PURPOSE?**

Our primary purpose in collecting information is to provide you with an efficient user experience. We may use the information defined in this Privacy Policy to: provide the services and any customer support you request; resolve disputes, collect fees, and troubleshoot problems; enforce our contractual agreements; customize, measure, and improve our products; inform you about service updates; compare information for accuracy, and verify your identity; provide other services for you as described when we collect the information. In addition, although initially we are not initially doing so, if we choose to provide you with promotional offers or advertising, we may use your information in order to provide you such items. Additionally, we may use your information as described below.

- **Registration Information**

We ask for Registration Information in order to verify your identity and to enable your use of our products. For services for which we charge individuals, we use third party banking

organizations and other providers of payment services to bill you, and in that case, we will, therefore, provide this billing provider with the necessary billing data.

We respect the privacy of personal e-mail accounts and we will store your e-mail addresses just as securely as other Personal Data. We will not send you unwanted e-mail messages or junk mail, and your details will not be passed to third parties for their marketing purposes without your explicit permission. However, we will use e-mail to send you messages about faults and service issues. We may also use e-mail to keep you up to date with news about RevTwo.

If you do not want to be kept informed in this way by e-mail, please contact us at [privacy@revtwo.com](mailto:privacy@revtwo.com). Further, we reserve the right to use e-mail to notify you of any eventual claims related to your use of our products, including without limitation claims of violation of third party rights.

- Content

In general, we will not review or provide third parties access to Content (other than third parties who are utilizing our products to communicate with you). However, if required by law, we reserve the right to pre-screen, review, flag, filter, modify, refuse or remove any or all of Content from our products.

- Customer Service Communications

Information which is voluntarily submitted in feedback is used for the purposes of reviewing this feedback and improving our products. We reserve the right to utilize anonymous information for marketing purposes, for instance by displaying selected comments on our products or in other communications. Further, we may from time to time ask you to provide information on your experiences which will be used to measure and improve quality. You are at no time in any obligation to provide any of such data. We will never use any personally identifiable (feedback) information without your explicit permission thereto.

- Log Information

We will use this routing information to provide you with access to our products and for statistical information.

### **3. TO WHOM DO WE TRANSFER YOUR PERSONAL INFORMATION?**

Except as provided below, we shall not sell, rent, trade or otherwise transfer any Registration Information or Content to any third party without your explicit permission, unless we are obliged to do so under applicable laws or by order of the competent authorities.

We may share your information with our affiliates and other service providers and third parties for which we are providing our service in connection with your use. We may offer some of our services in connection with other service providers. Registration Information that you provide to us may be sent to those providers in order to deliver the service provided by them;

similarly, personal information that you provide to those sites may be sent to us in order to operate our products.

Information collected by us may be stored and processed in any country in which we and our affiliates maintain facilities. We reserve the right to transfer information outside of the country where you reside and/or from which you use our products. By using our products you consent to any such transfer of information.

As we continue to develop our business, we might sell or buy subsidiaries or business units. In such transactions as well as in the event all or substantially all of our assets are acquired by a third party, personal information of our users will generally be one of the transferred business assets. We reserve the right to include your personal information, collected as an asset, in any such transfer to a third party.

Notwithstanding anything to the contrary in this Privacy Policy, we may access, use, preserve or disclose any information we have access to if we have a good faith belief that such access, use, preservation or disclosure of any information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process or enforceable governmental request, (b) enforce our contractual agreements, including investigation of potential violations thereof, (c) detect, prevent, or otherwise address fraud, security or technical issues, or (d) protect against imminent harm to the rights, property or safety of us, our users or the public as required or permitted by law.

#### **4. HOW DO WE PROTECT YOUR PERSONAL INFORMATION?**

We take appropriate organizational and technical measures to protect the data provided to us or collected by us, and do not retain it any longer than permitted in order to perform our services or as required under relevant legislation, with due observance of the applicable obligations and exceptions under the relevant legislation. You should be aware that internet communications are not always secure. Although we do take what we consider appropriate steps to protect your data, protection of information available over the internet is subject to attack from third parties, and accordingly we cannot promise you that third parties cannot access Content.

#### **5. HOW LONG IS YOUR PERSONAL DATA KEPT BY US?**

We will retain your information for as long as is necessary to: (1) provide the use of our products; (2) invoice charges and to maintain records until invoices cannot be lawfully challenged and legal proceedings may no longer be pursued; (3) communicate with you regarding other services that we offer; (4) comply with applicable legislation, regulatory requests and relevant orders from competent courts; (5) enforce our contractual agreements; or (6) fulfill any of the other purposes detailed in this Privacy Policy.

#### **6. WHAT ARE COOKIES AND HOW DO WE USE THEM?**

A cookie is a piece of data stored on the user's hard drive containing information about the user. Usage of a cookie will in no way be linked to any personally identifiable information while using our products. Once the user closes their browser, the cookie simply terminates. For instance, by setting a cookie on our product, the user would not have to log in a password more

than once, thereby saving time while on our products. If a user rejects the cookie, they may still use our products. The only drawback to this is that the user will be limited. Cookies can also enable us to track to enhance the experience using products. and for analytic purposes to help us understand the use of our products.

Some of our business partners may use cookies. However, we have no access to or control over these cookies. In addition, although initially we are not initially doing so, if we choose to provide you with promotional offers or advertising, the third party business party may use cookies for that purpose.

#### **7. HOW FAR DOES OUR RESPONSIBILITY EXTEND?**

This Privacy Policy applies to services that are owned and operated by us. We do not exercise control over other users or third party systems that may use our products. They may place their own or other files on their systems, collect data or solicit personal information from you. We accept no responsibility or liability for these other sites or services.

#### **8. CAN THIS PRIVACY POLICY BE MODIFIED?**

We reserve the right to modify the provisions of this Privacy Policy if deemed necessary. We will inform you of these changes by publishing the revised Privacy Policy at [www.revtwo.com/privacy](http://www.revtwo.com/privacy). The revised Privacy Policy shall become effective within thirty (30) days of such publishing, unless you expressly accept the revised statement earlier by clicking on the accept button. You agree that the express acceptance by you, or your continued use of RevTwo after the notice period of thirty (30) days, shall constitute your acceptance of the Privacy Policy.

#### **9. WHAT RIGHTS DO YOU HAVE AND HOW CAN YOU CONTACT US?**

If you would like to exercise your right to view, correct, complete or remove your Personal Data, please contact us at [info@revtwo.com](mailto:info@revtwo.com). Upon verification of your identity, we will attempt to quickly fulfill your request, provided we will not act contrary to applicable legislation by fulfilling your request.