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## **PRIVACY POLICY**

**Effective date:** January 1, 2022.

### **Privacy Policy Overview**

Eagle Technology Competence, LLC and its affiliates (collectively, “EagleTC”) is committed to protecting your privacy and complying with applicable data protection laws. This Privacy Policy outlines how EagleTC collects, uses, discloses, and safeguards information about you in connection with our Site, and other interactions with you. We also describe the choices you have about your information.

#### **1. Our Site.**

EagleTC through its website and other electronic means collects certain data “Site”.

Our Site also enable you to customize and connect your EagleTC account to Third-Party Services (“Third-Party Services”), including through apps which may be available to you via our platform. The collection of your information by these third parties is governed by the Third-Party Services’ privacy policies and terms. We recommend you carefully review their privacy policies and terms, as EagleTC is not responsible for Third-Party Services.

We rely on you to comply with applicable privacy laws when collecting, using, or disclosing information about individuals through the Site, including obtaining any necessary consents and providing any necessary notices. If we receive any questions or complaints regarding your use of the Site, we will direct the request to you for further assistance.

Our Site are not intended for use by children and should only be accessed by individuals who are at least 21 years old and are using the Site for business purposes.

#### **2. Using our Site.** We collect the following information when you use our Site:

##### **Account information.**

- Your contact and profile information including your name, email address, organization name, and address; your preferences such as language, time zone, and the types of communications you would like to receive from us; and image (if you choose to provide this). We may also obtain this information if you choose to use a login service to create or access your account.

- Billing and other payment information (if you sign up for a paid service or purchase a Third-Party Service), including payment method details, such as credit card number.
- The Site you have acquired from us, including the type of plan, number of team members, and transaction information related to the Site.

### **Content.**

- Your profile information you choose to connect to or input on the Site. For example, your login profile information may include your username.
- A specific location such as an address, a city, or a place (for example, a restaurant) if you choose to share this information.
- Content that you may send and receive through our Site may contain personal information of third parties. This may include information such as: names, geographic location, opinions, preferences, and phone numbers.

### **Logs, Usage, and Support Data.**

- Log data, which may include your IP address, the address of the web page you visited before using the Site, your browser type and settings, your device information (such as make, model, and OS), the date and time when you used the Site, information about your browser configuration, language preferences, unique identifiers, and cookies.
- Usage data and analytics, which may include the frequency of login, and the different types of activity undertaken by users such as frequently accessed areas of the Site.
- General Location information, such as IP address and the region in which you are located when you are logging in and using the Site, in accordance with the settings on your device.
- Customer support questions, issues, and general feedback that you choose to provide.
- Other data, analytics, statistics, and metrics generated by your use of Site.

### **Surveys, Events, Marketing and Other Activities.**

Surveys, contests, events (such as webinars and in-person events) for those we host or are affiliated with:

- Contact information, such as your name, email address, telephone number, organization name and address.
- Participation, attendance, feedback and opinions.
- General information about your organization that you choose to provide, such as annual company revenue, number of employees, and industry. We may also use service providers to obtain additional business-related information about your

organization such as the legal name, size, and publicly available revenue, to assist us in offering Site that are appropriate to your organization's needs.

### **Other Interactions.**

- Social media: Your messages, posts and other interactions with our brand and social media accounts.
- Email interactions and analytics: Information on how you engage with our emails such as email open and click rates, whether a link is clicked, which web pages are visited after opening the email, the type of browser and email clients you use, and general location (i.e. country and region) information.
- Teleconference, videoconference, and other meetings: Your preferences, feedback, opinions and business needs.
- Accessing resources (e.g. videos, whitepapers or case studies) on our website: Your name and contact information, and engagement analytics such as the type and frequency of resources accessed, viewed and downloaded.

### **Automatic Anonymous Information**

- When you visit or utilize the Site, we collect certain technical and routing information about your computer. For example, we log environmental variables such as browser type, operating system and CPU speed, and the Internet Protocol (IP) address of your originating Internet Service Provider, to try to bring you the best possible service. We also record search requests and results to try to ensure the accuracy and efficiency of our search engine. We use your IP address to track your use of the Site, including pages visited and the time spent on each page. We collect this information and use it to measure the use of this Site and to improve its content and performance. All of the information that is automatically submitted to us by your browser is considered anonymous information. To the extent we share such information with third parties, it is not traceable to any particular user and will not be used to contact you.

### **3. Applying for Employment.**

Our careers site collects information you choose to provide to us when applying for employment, which may include contact information, education and employment history, credentials, and LinkedIn profile information.

### **4. Browsing our Websites.**

When you browse our websites, we collect information about you as described below, some of which is collected automatically:

- When you use automated chat functionality (chatbots) to make an inquiry, provide feedback, or make another request, we may collect information about you such as your

name and email address, your specific feedback or request, and information related to your use of our Site.

- Eagle TC and our authorized service providers use cookies and other similar tracking technologies on our websites and Site including web beacons, pixels, and software tokens.
- Aggregated website usage data including form analysis data (such as time taken to complete the form), engagement rate, session replay, and mouse movements.

## **5. How Information is Used.**

We use your information for the purposes described below:

### **Providing and Securing our Site.**

- We need to identify and authenticate our users to ensure, for example, that only those authorized users are able to use the Site for their organization, and to make changes to their accounts.
- We use information that you provide when signing up to set up your account, process payments, contact you regarding the Site, and manage your account.
- We use your contact information and information related to your request to respond to your inquiries, manage our contract with you, respond to your questions and requests, and send you updates and information about the Site.
- We use logging and other data such as general location information—for example, the IP address of your browser or device, to help us manage the performance, security and compliance of the Site.
- Where you have chosen to share your specific location information, we use this information to provide location-based features and to use any functionality that relies on location information.
- We analyze usage information, your feedback, support queries, and survey responses to identify issues and help us understand how you use the Site so that we can make improvements to our Site.

### **Communicating with You.**

We use your contact information where appropriate to send you information about our Site, events, marketing communications (consistent with your preferences—see “Marketing emails, advertising and website browsing” below), and job opportunities.

We use email statistics, such as open rates, to assess the effectiveness of, and to make improvements to our communications. We also use engagement analytics to better understand your needs so that we can provide the information and Site that would be more suitable for you.

## **Improving our Websites and Applications.**

We use information about you to help us understand usage patterns and other activities on our websites and applications so that we can diagnose problems and make improvements, including enhancing usability and security. We also use website personalization software to help us present information on our websites that may be more relevant to you, such as displaying resources applicable to your industry or organization size.

If you choose to provide information about you, your usage of our Site and other feedback during telephone calls and other interactions to our customer support and sales teams, we may use, monitor, and record this information for training purposes, to make improvements to our internal sales and marketing processes, and to improve our Site.

## **6. Your rights Regarding your Information.**

### **Site Information.**

When using our Site, you may access, update, or correct most of your Account Information by logging in to your account to edit your profile or organization record.

If you have requests that cannot be carried out by logging in to your account, such as accessing additional information or deleting information about you, please email our [team](#). Please note that we may need to retain certain information about you for as long as you maintain an account for our Site, to provide you with our Site, for record keeping purposes, for payment processing, to comply with our legal and regulatory obligations, to resolve disputes, or to enforce the [applicable terms and conditions](#) or other agreement in place between you (or your organization) and Eagle TC (the “Terms of Service”).

Requests to access, correct, update, or delete your information can be made in writing to our [team](#) and will be handled within thirty (30) days unless they are unusually extensive or complex, in which case we will advise you of the expected timeline for handling your request.

You can contact our Support team for other general requests about your account by your preferred method listed [here](#).

### **Marketing Emails, Advertising and Website Browsing.**

For marketing communications, you may opt out of marketing communications sent by EagleTC by contacting our [team](#). Please note that if you are a EagleTC user, unsubscribing from marketing communications will not affect product-generated EagleTC emails sent in connection with your use of our Site.

EagleTC participates in interest-based advertising (where you may have visited our websites or another website which allows us to display advertising relating to our Site).

## **7. Accessibility to your Information.**

Eagle TC does not rent or sell your information. We restrict access to your information to authorized employees and we do not share your information with third parties except in the circumstances explained below.

### **Employees and Authorized Contractors.**

Our employees and authorized contractors may need to access information about you when they require this information to perform their job. For example, a customer support representative would need access to your account to validate your identity and respond to your question or request; our email communications team would need access to your contact information to ensure this information is sent correctly and any unsubscribe requests are properly managed; and our security staff would need to review information to investigate attempted denial of service attacks, fraudulent account activity, or other attempts to compromise the Site.

All our employees and contractors are required to agree to maintain the confidentiality and protect the privacy of your information.

### **Service Providers, Authorized Resellers, and Partners**

We will share limited information about you to authorized service providers we use for marketing Site, communicating with you, managing our customer database, the provision of professional Site, and providing and managing the Site (including hosting data centers, securing our Site, and payment processing).

We limit the number of service providers who are permitted to process your Content for the purpose of assisting us in delivering the Site. We refer to these service providers as "subprocessors".

Where you have purchased a service from an authorized reseller or partner, we may provide information about you to (and may receive information about you from) the reseller or partner as necessary to support your use of the service you purchased.

When sharing your information with any of the above service providers, resellers and partners, we ensure they agree to obligations consistent with this Privacy Policy and any other appropriate confidentiality and security measures, and only use your information to carry out the Site and your requests.

We may also participate in and run marketing events (e.g. virtual conferences, webinars, and provide resources) with sponsors and other organizations. Where the sponsors or other organizations wish to collect your information for their marketing purposes, while we may facilitate this (e.g. information may be collected on the same registration form), they will be doing so independently under their own policies. We will advise you and provide you an opportunity for you to share your information with the sponsors or other organizations for such purposes, either upon registration or during the event.

### **Social Networks and Third-Party Services.**

Where you are using our Site or if you authorize a Third-Party Service to access your account, you are agreeing to provide information about you to the Third-Party Services under their respective terms and privacy policies.

### **Customer Organizations.**

Where your employer or an entity has purchased Site on your behalf, we may disclose information about you such as your name and email address, and some usage information including whether a user has logged in to the Service, frequency of login, time spent using the Site to assist your employer or the entity in managing its use and maximizing the value of the Site.

### **Successor and Affiliated Entities.**

We may share information about you among EagleTC-controlled affiliates and subsidiaries, and they will protect your information in a manner that is consistent with this Privacy Policy and where applicable, in accordance with the privacy policy specific to the entity.

We may also disclose your information as part of a corporate transaction such as a merger or sale of assets. If we do, we will inform such entities of the requirement to handle your information in accordance with this Privacy Policy, or inform you that you are covered by a new privacy policy.

### **Law Enforcement, Government Agencies, and Professional Advisors.**

We may need to disclose information about you where we believe that it is reasonably necessary to comply with a law or regulation, or if we are otherwise legally required to do so, such as in response to a court order or legal process, or to establish, protect, or exercise our legal rights or to defend against legal claims or demands. For governmental data access requests concerning you or your organization, we would first attempt to redirect the request to you and/or we would first attempt to notify you unless we are legally prohibited from doing so.

In addition, we may disclose information about you if we believe it is necessary to investigate, prevent, or take action: (a) against illegal activities, fraud, situations involving potential threats to our rights or property (or to the rights or property of those who use our Site), or to protect the personal safety of any person; or (b) regarding situations that involve the security of our Site, abuse of the Site infrastructure, or the Internet in general (such as voluminous spamming, or denial of service attacks).

We also use professional advisors, including lawyers and accountants, and may be required to disclose information about you when engaging them for their Site and as necessary for audits, financial and other regulatory reviews.

## **8. Occurrence of International Data Transfers at EagleTC.**

Under the General Data Protection Regulation (GDPR) and other data protection laws, information about you may only be transferred from your region to other regions if certain requirements are met. For instance, under the GDPR, information about you may be transferred from the European Economic Area (EEA) to outside the EEA if adequate data protections are in place. Our Site are managed by Eagle TC's headquarters in America. As the European Commission considers America to be a country which provides adequate data protection, information about you may be transferred from the EEA to America.

Eagle TC also uses third-party service providers, such as managed hosting providers, credit card processors, and technology partners to provide the software, networking, infrastructure and other Site required to operate the Site. These third-party providers may process or store personal data on servers outside of the EEA, UK, and Switzerland, including in Canada or the US. We rely on adequacy and standard contractual clauses to ensure that information about you is lawfully transferred under EU law. In this case, we have implemented supplementary measures as outlined in the section "How do we safeguard your information?".

The third-party service providers we use to help us deliver the Site and which process your Content are referred to as "subprocessors".

## **9. Safeguarding your Information.**

EagleTC maintains industry standard security safeguards to protect your information. This includes ensuring our employees receive appropriate security and privacy training and guidance so they are aware of the measures they need to implement to protect your information.

Access controls are in place to limit access to your information to those who need it to perform their jobs. For example, information about you may be provided to our customer support specialists to help you with your requests. Individuals who are permitted to handle your information must adhere to confidentiality obligations.

We encrypt data in transit and at rest, where appropriate, to ensure that your information is kept private. We undertake service provider security and privacy reviews to ensure that service



providers follow our stringent requirements to safeguard your information, and we also enter into data protection agreements with our service providers. All payment information is fully encrypted and handled only by PCI certified organizations. More detailed information on our security practices is available on our website at <https://eagletc.com>.

## **10. Information Retention.**

We retain your information indefinitely, for record keeping purposes, to comply with our legal obligations, resolve disputes, and enforce the terms for the Site. After it is no longer necessary for us to retain information about you, or otherwise upon your request, we will dispose of it in a secure manner or anonymize the information.

Aggregated data is used by EagleTC for analysis, product improvement, and troubleshooting purposes.

## **11. Eagle TC's Roles under the GDPR and UK Data Protection Laws.**

Depending on the situation and the type of data involved, EagleTC may act as a data controller or a data processor.

### **EagleTC as Data Controller.**

EagleTC acts as a data controller when we are:

- Collecting information from you to set up and administer your EagleTC account (for example, Account information such as your name and email address);
- Monitoring usage information on our website;
- Managing your contact and other related information to send marketing, Site, and other communications to you;
- Responding to a support or general inquiry; and
- Recruiting individuals for job opportunities.

## **12. Legal Bases for Processing when Eagle TC is a Data Controller.**

The legal bases for processing information about you include:

- Your consent (for example, when you have provided your information to sign up for an account; or you have provided your employment history when applying for a job). Where we rely on your consent to process personal data, you have the right to withdraw your consent at any time.
- It is necessary to perform a contract (for example, we may need your information to fulfill our obligations of providing Site to you under the terms relevant to the Site you have acquired).

- Legitimate interest (for example, to provide, maintain and improve the Site for you, to maintain the security of the Site, and to attract new customers to maintain demand for the Site).
- In some cases, we may have a legal obligation to process your personal data to comply with relevant laws (for example, processing payroll and tax information to comply with relevant employment and tax legislation); or processing is necessary to protect your vital interests or those of another person (for example, obtaining health-related information during a medical emergency).

### **13. Your rights when EagleTC is a Data Controller.**

Where EagleTC is acting as a data controller you may have the following rights:

- Right to object to processing: you may request that Eagle TC stops processing information about you (for example, to stop sending you marketing communications).
- Right to restrict processing: you may request that we restrict processing information about you (for example, where you believe that this information is inaccurate).
- Right to data portability: you may request that we provide you with information EagleTC has about you in a structured, machine-readable, and commonly used format, and you may request that we transfer this information to another data controller.

If you would like assistance on any of the above requests, please email us with details of your request so that we may consider how we can help you.

### **14. Eagle TC as a Data Processor.**

Where you are using our Site and making decisions about the personal data that is being processed in the Site, you are acting as a data controller and EagleTC is acting as a data processor.

There are certain obligations under the GDPR that you have as a data controller, including being responsible for managing Content on the Site. As a data processor, EagleTC will only access and process Content to provide you with the Site in accordance with your instructions (which you provide through the Site), the Terms of Service, and applicable laws. As part of delivering the Site, we may process Content to further improve the Site, such as enhancing usability and developing new features.

If you, as a data controller, require EagleTC to agree to data protection requirements under Article 28, GDPR, or under UK data protection laws, EagleTC makes available a data processing addendum that meets these requirements.

If you are using the Site as an authorized user of a EagleTC customer (whether that customer is your employer, another organization, or an individual), that customer determines its own policies (if any) regarding storage, access, modification, deletion, sharing, and retention of personal data and Content, which may apply to your use of the Site. Please check with that customer about the policies and settings it has in place.

## 15. Your California Privacy Rights.

If you are a consumer as defined in the California Consumer Privacy Act (CCPA), the following provisions apply to you. Definitions of terms are set out in the CCPA.

### Information about your Personal Information.

- The categories and specific types of personal information collected and sources from which personal information are collected are set out [here](#).
- The business and commercial purposes for collecting personal information are set [here](#).
- The categories of third parties with whom your information is shared are set out [here](#).

### Your Rights Under CCPA.

Under the CCPA, you may have the following specific rights:

- The right to know about the personal information collected about you, which we have set out under “Information about your Personal Information”
- The right to have your personal information deleted.
- The right not to be discriminated against for exercising consumer rights under the CCPA.

You may exercise your rights by emailing our Privacy team. If your organization requires a CCPA addendum, please email us your customer details (organization name and plan information) with your request [here](#).

While we disclose personal information to service providers for the purpose of managing our relationship with you (e.g. distributing marketing communications) and providing the Site, we do not sell your personal information.

## 16. Changes to this Privacy Policy.

We may make changes to this privacy policy at any time to reflect updates to our Site, applicable laws, and other factors. We will include a prominent notice on this website and/or our Site if we make any material changes, but we encourage you to stay informed by reviewing this policy periodically.

## 17. How to Contact Us.

If you have any questions, concerns or feedback, please [email](#) our Privacy team and Privacy Officer/Data Protection Officer; or send a letter to:



**Eagle Technology Competence, LLC**

**Attn: Privacy Team**

**125 E. 3<sup>rd</sup> Street Ste. 100**

**Rochester, MI 48307**

If we are unable to resolve your concerns, you also have the right to contact your local data protection authority.