

Introduction

Numonix LLC, a Delaware limited liability company, (“**Numonix**”, “**we**”, “**us**”, “**our**”) takes the protection of personally identifiable information (“**Personal Data**”) very seriously. Please read this privacy policy (the “**Policy**”) to learn what we are doing with your Personal Data, how we protect it, and what privacy rights you may have under applicable data protection and privacy laws.

What Is Covered by This Privacy Policy

This Policy addresses data subjects whose Personal Data we may receive from our customers (“**Customers**”) in our IXCloud web-based software application, TRaaS service offers and our Recite and Recite SPE software applications (collectively, the “**Services**”).

If you are not a Numonix Customer but engage in communications powered by our Services (an “**End User**”), we may collect and store Personal Data about you on behalf of our Customers. However, in these cases, we do not decide *why* and *how* that Personal Data will be processed. Our Customers use our Services to store and process an End User’s Personal Data. In that case, we act only as a storage and service provider. We do not decide what Personal Data is being stored, and in general, we will only access such Personal Data at our Customer’s request in connection with customer and technical support matters. We will only access Personal Data to provide the Services that our Customer has directed us to provide, or if we are required by law to do so.

When you give your Personal Data to one of our Customers or when we collect your Personal Data on *their* behalf, our Customer’s privacy policy, rather than this Policy, will apply to the processing of your Personal Data. If you have a direct relationship with one of our Customers, please contact them to exercise your privacy rights.

This Policy also addresses Personal Data we receive directly from data subjects through their use of our websites. You can also [manage your cookie preferences](#).

Our Role with Respect to Your Personal Data

There is Personal Data that we process for own purposes and Personal Data that we process on behalf of our Customers. This means that we do not always have the same degree of decision-making with respect to why and how each piece of Personal Data will be processed.

Processor. Numonix acts as a data processor or service provider for the Personal Data we process for our Customer when providing our Services. This means that our Customers determine the type of Personal Data they provide to us to process on their behalf. We typically have no direct relationship with the individuals whose Personal Data we receive from our Customers.

Controller. Numonix acts as a data controller or business for the Personal Data we collect from visitors that visit our websites.

Lawful Bases for Processing

We must have a valid reason to use your Personal Data. This is called the “lawful basis for processing”.

When we act as a data controller, we may process your Personal Data on the basis of:

- your consent;
- the need to perform a contract with you;
- our legitimate interests;

- the need to comply with the law; or
- any other ground, as required or permitted by law.

Where we process your Personal Data based on your consent, you may withdraw it at any time. However, this will not affect the lawfulness of our processing before you withdrew your consent. It will also not affect the validity of our processing of Personal Data performed on other lawful grounds.

Where we receive your Personal Data as part of providing our Services to you to fulfill a contract, we require such Personal Data to be able to carry out the contract. Without that necessary Personal Data, we will not be able to provide the Services to you.

Where we process your Personal Data based on our legitimate interests, the legitimate interests pursued by us include the provision of our Services, our interests in marketing our Services, and our interests in monitoring and enhancing the performance of our Services.

Within the scope of this Policy, we may also process Personal Data based on the instructions of our Customers. To learn about their lawful bases for processing your Personal Data, please read the privacy policy of the relevant Customer.

How Personal Data is Collected and for What Purpose

We will not collect additional categories of Personal Data or otherwise utilize your Personal Data without informing you.

Technical and Customer Support. If our Customers require customer or technical support, we may obtain access to any Personal Data you, as an End User, may have shared with the Customer through our Services. We may also collect the statistics of call recordings (such as call telemetry: call duration, technical errors, participant locations and names) pursuant to the Services. Numonix has procedures in place so that such Personal Data is access only at our Customer's written request or where required by law. If you request support, or if you contact us by other means including via a phone call or webform, we process your Personal Data to perform our contract with our Customer and to the extent it is necessary for our legitimate interest in fulfilling your requests, communicating with you, and abiding by our legal obligations.

Interest in Services. If you contact us with an interest in obtaining information about our Services; register for our mailing list or Services; explore or download content from our websites; or interact with our marketing emails and advertisements, we may use Tracking Technologies (defined below) to collect information related to your interests and ask for your contact information (name, title, company name, address, phone number, and email address) to send you marketing information and communications about us, our partners, and our Services, promotions or events. We may also automatically collect information about your device and your usage of our websites or emails. This information may include identifiers, internet activity information such as IP address (or proxy server information), device and application information, identification numbers and features, location, browser type, plug-ins, integrations, Internet service provider and/or mobile carrier, the pages and files viewed, searches, referring website, app or ad, operating system, system configuration information, advertising and language preferences, date and time stamps associated with your usage, and frequency of visits to the websites.

If we have not entered into a contract with you, we base the processing of your Personal Data on our legitimate interest to operate and administer our websites, conduct marketing research, analyze overall trends, advertise our Services and events, identify customer opportunities, provide you with content you access and request (e.g., to download content from our websites), help us provide and improve our Services, offer a tailored experience for users, secure and maintain our Services and websites, verify accounts and activity, investigate suspicious activity, assess and improve customer and user experiences, enforce our terms and policies, identify future opportunities for development, assess capacity requirements, and protect our rights and the rights of others.

If we have entered into a contract with you, we base the processing of your Personal Data on our obligations to perform our contract with you as a Customer.

Service Accounts. If you register for an account that we provide, we may ask you to provide account information (such as username, contact information and location), your contact information (such as name, title, company name, address, country, phone number and email address) and financial and billing information (such as billing name and address, account receiving contacts or bank account information). We will process your Personal Data to provide our Services to you, including sending related communications to you, to perform our contract. If you have provided financial information to us, we process your Personal Data to verify that information and to collect payments to the extent that doing so is necessary to complete a transaction and perform our contract with you.

If you utilize our Services, we may automatically collect information about your device and your usage of our Services. This information may include identifiers, internet activity information such as IP address (or proxy server information), device and application information, identification numbers and features, location, browser type, plug-ins, integrations, Internet service provider and/or mobile carrier, the pages and files viewed, operating system, system configuration information, date and time stamps associated with your usage, and frequency of visits to the websites. If we have entered into a contract with you, we base the processing of your Personal Data on our obligations to perform our contract with you as a Customer.

We may also collect the statistics of call recordings pursuant to the Services, to provide technical support, improve our services, and abide by our legal obligations.

Surveys. If you voluntarily submit certain information to our Services, such as filling out a survey about your experience, we may collect the information you have provided to satisfy our legitimate interest in improving our Services.

Events and Promotions. If you register for an event, webinar, or promotion, we may require you to provide to us your contact information (such as name, title, company name, address, country, phone number and email address) and financial or billing information (such as billing name and address). We will process your Personal Data to plan and host events or webinars for which you have registered or that you attend, including sending related communications to you, to perform our contract. If you register for a contest or promotion, we process your Personal Data to perform our contract. If you have provided financial information to us, we process your Personal Data to verify that information and to collect payments to the extent that doing so is necessary to complete a transaction and perform our contract with you.

We may use Tracking Technologies (defined below) to collect information related to your interests and to send you marketing information and communications about us, our partners, and our Services, promotions or events. If we have not entered into a contract with you, we base the processing of your Personal Data on our legitimate interest to conduct marketing research, advertise our Services and events, assess potential customer opportunities, and to provide you with content you access and request (e.g., access to a webinar).

Office Visits. If you visit our offices, you may be required to register as a visitor and to provide your name, email address, phone number, company name and time and date of arrival. We will process your Personal Data for security reasons, to register visitors to our offices and to manage non-disclosure agreements that visitors may be required to sign, to the extent such processing is necessary for our legitimate interest or to perform our contracts with our Customers.

Other Sources. We also may collect information about you from other sources including third parties, partners and resellers for the purposes of delivering relevant email content, event promotion, determining eligibility, verifying contact information, and supporting their sales activities. We may collect Personal Data like business contact information (including name, mailing addresses, job titles, email addresses, phone numbers, intent data, and IP addresses). We may combine this information with Personal Data provided by you. We base the processing of your Personal Data on our legitimate interest to update, expand, and analyze our records, identify new customers, and to provide Services that may be of interest to you.

Compliance and Legal Obligations. We process your Personal Data to review compliance with the contracts and policies to the extent that it is in our legitimate interest. We may also process your Personal Data when cooperating with public and government authorities, courts or regulators in accordance with our legal obligations under applicable laws to the extent this requires the processing or disclosure of Personal Data to protect our rights or is necessary for our legitimate interest.

Cookies and Other Tracking Technologies. We use common information-gathering tools, such as tools for collecting usage data, cookies, web beacons, pixels, tags, and similar technologies to automatically collect information that may contain Personal Data as you navigate our websites, our Services, or interact with emails we have sent to you. We base the processing of your Personal Data on our legitimate interest to operate and improve our websites and marketing emails. All of these tracking technologies are collectively referred to as “**Tracking Technologies**” in this Policy.

Cookies. A cookie is a small file stored on your device that contains information about your device. We may use cookies to provide basic relevant ads, website functionality, authentication (session management), usage analytics (web analytics), to remember your settings, and to generally improve our websites and Services.

Local Storage. Local storage enables our website to store information locally on your device. Local storage may be used to improve your experience with our website, for example, by enabling features, remembering your preferences and speeding up our website functionality.

GIFs (a.k.a. “web beacons”). Our website may also employ a software technology called clear GIFs that helps us better manage content on our website by providing insight into which content is most effective. Clear GIFs are tiny graphics with a unique identifier, similar in function to cookies, which are used to track the online movements of website users.

Pixels. A tracking pixel is a 1x1 pixel graphic used for the purpose of tracking user behavior, web traffic and site conversions. A tracking pixel allows us to collect data relating to the use of our website. Tracking pixels are used to trigger advertisements on any participating websites based on the activity tracked from your browser or device and can also be used for third-party web analytics. For example, we may place a pixel in marketing emails that notify us when you click on a link in the email.

Tags. A tag is a generic name for code elements found in web pages. Most tags simply describe the content of the page, but certain types of tags contain programmatic elements or inject dynamic content like video or audio files into the page. Most of the cookies set on our website will be set via these tags, but some tags may also collect data about our visitors without the use of cookies.

How We Use Tracking Technologies on our Website

You can manage your cookie preferences [manage your cookie preferences](#) through our website.

The use of cookies is industry standard so your browser may be set to accept cookies. If you would prefer not to accept cookies, you can alter the configuration of your browser to reject all cookies or some cookies. Note, if you reject certain cookies, you may not be able to access all features provided by our Services. For more information, please visit <https://www.aboutcookies.org>. You may also control your online behavioral advertising preferences and opt out from having your data processed by certain marketing companies by visiting <http://www.youronlinechoices.com/> and <http://optout.aboutads.info/>. Please note that managing these preferences will not turn off internet advertisements in general. You will receive the same amount of advertisements, but it will be less reflective of your interests, as based on your web browsing habits. The opt-out preferences that you set may be nullified if you delete your cookies.

Responding to Do Not Track (DNT) Signals. "Do Not Track" is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other third-parties. For more

information, please visit <https://allaboutdnt.com/>. Our Services are set to respond to “Do Not Track” signals received from various web browsers.

We use session and persistent cookies. Session cookies are deleted when you close your browser. Persistent cookies may remain even after you close your browser, but always have an expiration date. Most of the cookies placed on your device through our Services are first-party cookies which are placed directly by us. Other parties, such as [Google](#) and [Freshworks](#), may also set their own (third-party) cookies through our Services. Please refer to the policies of these third parties to learn more about the way in which they collect and process information about you.

Strictly Necessary Tracking Technologies. These Tracking Technologies are necessary for our website to function and cannot be turned off in our systems. They are usually only set in response to actions you take which amount to a request for services, such as logging in or filling out forms. You may be able to set your browser to block or alert you about some of these Tracking Technologies. However, if you block these Tracking Technologies, some parts of our website will not work.

Name	Provider	Purpose	Duration
<i>XSRF-TOKEN</i>	Freshworks	<i>Used to help with site security in preventing Cross-Site Request Forgery attacks.</i>	<i>session</i>
<i>_helpkit_session</i>	Freshworks	<i>The secret key for verifying cookie session data integrity. If you change this key, all old sessions become invalid.</i>	<i>session</i>
<i>_x_w</i>	Freshworks	<i>Used to provide customer support and track unique sessions.</i>	<i>session</i>
<i>ARRAffinitySameSite</i>	<i>Numonix</i>	<i>Used for load balancing to make sure the visitor page requests are routed to the same server in any browsing session.</i>	<i>session</i>
<i>ARRAffinity</i>	<i>Numonix</i>	<i>Used for load balancing to make sure the visitor page requests are routed to the same server in any browsing session.</i>	<i>session</i>
<i>qdl0GbDnF</i>	<i>Numonix</i>	<i>Used for Cerber firewall anti malware.</i>	<i>a few seconds</i>
<i>cerber_groove</i>	Cerber Security & Anti-Spam	<i>Used to provide protection against hackers.</i>	<i>one year</i>
<i>cerber_groove_x_*</i>	Cerber Security & Anti-Spam	<i>Used to provide protection against hackers.</i>	<i>two weeks</i>

Performance Tracking Technologies. These Tracking Technologies allow us, among other things, to count website visits and traffic sources so we can measure and improve the performance of our website. They help us to know which pages are the most – and least – popular, and see how you move around the website. If you do not allow these Tracking Technologies, we will not know when you have visited our website and will not be able to monitor our website’s performance.

Name	Provider	Purpose	Duration
<i>_gid</i>	<i>Numonix</i>	<i>Used for Google Analytics to store and count page views.</i>	<i>one day</i>
<i>_ga</i>	<i>Numonix</i>	<i>Used for Google Analytics to store and count page views.</i>	<i>two years</i>
<i>_gat</i>	<i>Numonix</i>	<i>Used for Google Analytics to read and filter requests from bots.</i>	<i>one minute</i>
<i>_gclxxx</i>	<i>Numonix</i>	<i>Used for conversion tracking.</i>	<i>three months</i>

<i>__hssrc</i>	<i>Numonix</i>	<i>Used for HubSpot to store a unique session ID.</i>	<i>session</i>
<i>__hstc</i>	<i>Numonix</i>	<i>Used for HubSpot to store time of visit.</i>	<i>six months</i>
<i>__hssc</i>	<i>Numonix</i>	<i>Used for HubSpot to keep track of sessions.</i>	<i>thirty minutes</i>
<i>pyHjuYgviBOMf</i>	<i>Numonix</i>	<i>Used for Hubspot.</i>	<i>a few seconds</i>
<i>History.store</i>	<i>Numonix</i>	<i>Used for WooCommerce to store last visit.</i>	<i>at least one session</i>

Functional Tracking Technologies. These Tracking Technologies enable our website to provide enhanced functionality and personalization. They may be used by us or by third-party providers whose services we have added to our pages. If you do not allow these Tracking Technologies, then some or all of these services may not function properly.

Name	Provider	Purpose	Duration
<i>cookie_notice_accepted</i>	<i>Numonix</i>	<i>Used to read if cookies can be placed.</i>	<i>one month</i>
<i>_GRECAPTCHA</i>	Google	<i>Used to help identify bots and prevent abuse of the website.</i>	<i>six months</i>
<i>test_cookie</i>	<i>DoubleClick (Google third-party cookie)</i>	<i>Used to check if the user's browser supports cookies.</i>	<i>fifteen minutes</i>
<i>zsFnlf</i>	<i>Numonix</i>	<i>Used to allow website accessibility through Userway.</i>	<i>a few seconds</i>
<i>IJsfRN</i>	<i>Numonix</i>	<i>Used to provide Freshdesk chat.</i>	<i>a few seconds</i>
<i>pnUuVRylblxfQT</i>	<i>Numonix</i>	<i>Used to provide the cookie notice.</i>	<i>a few seconds</i>
<i>__hsmem</i>	<i>Numonix</i>	<i>Used for HubSpot to identifies a membership user when they are currently logged in.</i>	<i>seven days</i>
<i>messagesUtk</i>	<i>Numonix</i>	<i>Used for HubSpot to recognize visitors who utilize the chat feature by storing browser details.</i>	<i>six months</i>
<i>hs-messages-is-open</i>	<i>Numonix</i>	<i>Used for HubSpot to store if a message has been shown.</i>	<i>thirty minutes</i>
<i>hs-messages-hide-welcome-message</i>	<i>Numonix</i>	<i>Used for HubSpot to prevent the chat widget welcome message from appearing again after it is dismissed.</i>	<i>one day</i>
<i>hs_ab_test</i>	<i>Numonix</i>	<i>Used for HubSpot to store ID's of experiments and sessions for A/B testing.</i>	<i>session</i>
<i>__hs_do_not_track</i>	<i>Numonix</i>	<i>Used for HubSpot to store "do not track" signals.</i>	<i>six months</i>

*_key	Numonix	Used for HubSpot when visiting a password-protected page, so future visits to the page from the same browser do not require login again.	fourteen days
wordpress_test_cookie	WordPress	Used to read if cookies can be placed.	Session
wordpress_logged_in_*	WordPress	Used to store logged in users.	persistent
_lscache_vary	Litespeed	Used to store whether you are logged into the site and what your user role is. It is used to help improve site performance for logged in users.	two days
FUvpzjDoTrOscu	Numonix	Used for the Litespeed cache	a few seconds
VISITOR_INFO1_LIVE	YouTube	Used to provide bandwidth estimations.	six months
wd	Meta	Used to read screen resolution.	one week
csm	Meta	Used to provide fraud prevention.	ninety days
actppresence	Meta	Used to store and track if the browser tab is active.	session
local_storage_support_test	Twitter	Used to provide load balancing functionality.	persistent
cmplz_banner-status	Complianz	Used to store if the cookie banner has been dismissed.	one year
cmplz_marketing	Complianz	Used to store cookie consent preferences.	one year
cmplz_functional	Complianz	Used to store cookie consent preferences.	one year
cmplz_preferences	Complianz	Used to store cookie consent preferences.	one year
cmplz_statistics	Complianz	Used to store cookie consent preferences.	one year
cmplz_policy_id	Complianz	Used to store accepted cookie policy ID.	one year

Targeting Tracking Technologies. These Tracking Technologies may be used on our website by us or our advertising partners (or set directly by our advertising partners) to collect data about your online activity. They record your visits to our website, the pages you have visited, and the links you have followed. They are used by our advertising partners to build a profile of your interests and show you relevant advertisements on our website as well as other sites. For example, they are used to detect when you click on an ad and show you ads based on your social media interests and browsing history.

If you do not allow these Tracking Technologies, you will experience less targeted advertising.

Name	Provider	Purpose	Duration
__cf_bm	Numonix	Used to manage incoming traffic that matches criteria associated with bot.	a few seconds
_gat_gtag_xxxxxxxx	Numonix	Google Analytics.	a few seconds

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ljZTyHzgqAm	Numonix	Google Analytics.	a few seconds
CONSENT	Google	Detect if you have accepted the marketing cookies in the cookie banner.	seventeen years
YSC	YouTube	Registers a unique ID to keep statistics of what videos from YouTube the user has seen.	session
GPS	YouTube	Used to store location data.	session
PREF	YouTube	Used to store user preferences.	eight months
Google Fonts API	Google	Used to read user IP address.	session
rc::c	Google	Used to read and filter requests from bots.	session
rc::b	Google	Used to read and filter requests from bots.	session
rc::a	Google	Used to read and filter requests from bots.	persistent
IDE	DoubleClick (Google third-party cookie)	DoubleClick is Googles real time bidding advertising exchange.	twenty-four months
_fw_crm_v	Freshworks	Used to track visitor/user identity and chat sessions performed by the user.	one year
hubspotutk	HubSpot	Used to store and track a visitor's identity	six months
fbclid	Meta	Used to store last visit.	two years
fbm*	Meta	Used to store account details.	one year
xs	Meta	Used to store a unique session ID.	three months
fr	Meta	Used to provide ad delivery or retargeting.	three months
act	Meta	Used to store logged in users.	ninety days
_fbp	Meta	Used to store and track visits across websites.	three months
datr	Meta	Used to provide fraud prevention.	two years
c_user	Meta	Used to store a unique user ID.	thirty days
sb	Meta	Used to store browser details.	two years
* fbm	Meta	Used to store account details.	one year
metrics_token	Twitter	Used to store if the user has seen embedded content.	persistent

Disclosure and Sharing

We may share or disclose Personal Data to the third parties listed below. Some of these third parties may be located outside of the United States. However, when the Personal Data is protected by the GDPR, before transferring your Personal Data to these third parties, we will either ask for your explicit consent or require the third party to maintain at least the same level of privacy and security for your Personal Data that we do. We remain liable for the protection of your Personal Data that we transfer or have transferred to third parties, except to the extent that we are not responsible for the event that leads to any unauthorized or improper processing.

Service Providers. With our contracted service providers, who provide services such as IT and system administration and hosting, communication services, credit card processing, research and analytics, marketing, webforms, and customer support.

Our Resellers. With resellers to the extent such sharing of data is necessary to fulfill a request you have submitted via our websites or for customer support, marketing, technical operations and account management purposes.

Your Affiliates. If you use our Services as a user, we may share your Personal Data with our affiliated Customer responsible for your access to the Services to the extent this is necessary for verifying accounts and activity, investigating suspicious activity, or enforcing our terms and policies.

Our Affiliates. We may disclose your Personal Data to our subsidiaries or affiliates, but only if necessary for business purposes, as described in this Privacy Policy.

Event Sponsors. If you attend an event or webinar organized by us, or download or access content, we may share your Personal Data with sponsors of the event. If required by applicable law, you may consent to such sharing via the registration form or by allowing your attendee badge to be scanned at a sponsor booth. In these circumstances, your information will be subject to the sponsors' privacy statements.

Contest and Promotion Sponsors. With sponsors of contests or promotions for which you register.

Third party networks and websites. With third-party advertising networks and websites, so that we can market and advertise on third party platforms and websites (examples: [Google](#) and [Freshworks](#)).

Professional Advisers. In individual instances, we may share your Personal Data with professional advisers acting as service providers, processors, or joint controllers - including lawyers, bankers, auditors, and insurers based in countries in which we operate, and to the extent we are legally obliged to share or have a legitimate interest in sharing your Personal Data.

Change in Ownership. We may disclose your Personal Data if we sell or transfer all or some of our company's business interests, assets, or both, or in connection with a corporate restructuring. In accordance with applicable laws, we will use reasonable efforts to notify you of any transfer of Personal Data to an unaffiliated third party.

Anonymous and Aggregated. We reserve the right to use, transfer, sell, and share any anonymous and aggregated data for any legal purpose. Such data does not include any Personal Data. The purposes may include analyzing usage trends or seeking compatible advertisers, sponsors, and customers.

Legal Requirements. We may disclose your Personal Data to the extent required by law or if we have a good-faith belief that such disclosure is necessary in order to comply with official investigations or legal proceedings (whether initiated by governmental/law enforcement officials, or private parties). If we must disclose your Personal Data to governmental/law enforcement officials, we may not be able to ensure that such recipients will maintain the privacy or security of your Personal Data.

How Long Do We Keep Your Personal Data

We will retain your Personal Data for as long as necessary to fulfil the purpose for which it was provided or collected, in accordance with our data retention policies. For example, we will retain and use your Personal Data to the extent necessary to comply with our legal obligations (such as, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

If your Personal Data is used for more than one purpose, we will retain it until the purpose with the longest retention period expires; but we will stop using it for the purpose with a shorter retention period once that period expires. Our retention periods are also based on our business needs and good practice and legal requirements.

In cases where we act as a data processor, we retain Personal Data for as long as instructed by the respective Customer (who typically acts as a data controller). We may delete the Personal Data submitted to us by our Customers within two (2) weeks of the end of our service agreement with the Customer, unless applicable laws require otherwise.

What Privacy Rights Do You Have?

You have specific rights regarding your Personal Data that we collect and process. Please note that you can only exercise these rights with respect to Personal Data that we process about you when we act as a data controller or as a “business” under the CCPA. To exercise your rights with respect to information processed by us on behalf of one of our Customers, please read the privacy policy of that Customer.

In this section, we first describe those rights and then we explain [how you can exercise those rights](#).

Right to Know What Happens to Your Personal Data (The

This is called the **right to be informed**. It means that you have the right to obtain from us all information regarding our data processing activities that concern you, such as how we collect and use your Personal Data, how long we will keep it, and who it will be shared with, among other things.

We are informing you of how we process your Personal Data with this Policy. We will always try to inform you about how we process your Personal Data. However, if we do not collect the Personal Data directly from you, the GDPR exempts us from the obligation to inform you (i) when providing the information is either impossible or unreasonably expensive; (ii) the gathering and/or transmission is required by law, or if (iii) the Personal Data must remain confidential due to professional secrecy or other statutory secrecy obligations.

Right to Know What Personal Data Numonix Has About You

This is called the **right of access**. This right allows you to ask for full details of the Personal Data we hold about you.

You have the right to obtain from us, including confirmation of whether or not we process Personal Data concerning you, and, where that is the case, a copy or access to the Personal Data and certain related information.

Once we receive and confirm that the request came from you or your authorized agent, we will disclose to you:

- The categories of your Personal Data that we process;
- The categories of sources for your Personal Data;
- Our purposes for processing your Personal Data;
- Where possible, the retention period for your Personal Data, or, if not possible, the criteria used to determine the retention period;
- The categories of third parties with whom we share your Personal Data;
- If we carry out automated decision-making, including profiling, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you;
- The specific pieces of Personal Data we process about you in an easily-sharable format;
- If we disclosed your Personal Data for a business purpose, the categories of Personal Data and categories of recipients of that Personal Data for and disclosure;
- If we rely on legitimate interests as a lawful basis to process your Personal Data, the specific legitimate interests; and
- The appropriate safeguards used to transfer Personal Data from the EEA or the UK to a third country, if applicable.

Under some circumstances, we may deny your access request. In that event, we will respond to you with the reason for the denial.

Right to Change Your Personal Data

This is called the **right to rectification**. It gives you the right to ask us to correct without undue delay anything that you think is wrong with the Personal Data we have on file about you, and to complete any incomplete Personal Data.

If your account settings do not allow you change the information yourself, please [contact us](#) and we will do our best to change the Personal Data for you.

Right to Delete Your Personal Data

This is called the **right to erasure, right to deletion, or the right to be forgotten**. This right means you can ask for your Personal Data to be deleted.

Sometimes we can delete your information, but other times it is not possible for either technical or legal reasons. If that is the case, [we will consider if we can limit how we use it](#). We will also inform you of our reason for denying your deletion request.

Right to Ask Us to Limit How We Process Your Personal Data

This is called the **right to restrict processing**. It is the right to ask us to only use or store your Personal Data for certain purposes. You have this right in certain instances, such as where you believe the data is inaccurate or the processing activity is unlawful.

Right to Ask Us to Stop Using Your Personal Data

This is called the **right to object**. This is your right to tell us to stop using your Personal Data. You have this right where we rely on a legitimate interest of ours (or of a third party). You may also object at any time to the processing of your Personal Data for direct marketing purposes.

We will stop processing the relevant Personal Data unless: (i) we have compelling legitimate grounds for the processing that override your interests, rights, or freedoms; or (ii) we need to continue processing your Personal Data to establish, exercise, or defend a legal claim.

If we have received your Personal Data in reliance on the Data Privacy Framework, you may also have the right to opt out of having your Personal Data shared with third parties and to revoke your consent to our sharing your Personal Data with third parties. You may also have the right to opt out if your Personal Data is used for any purpose that is materially different from the purpose(s) for which it was originally collected or which you originally authorized.

Right to Port or Move Your Personal Data

This is called the **right to data portability**. It is the right to ask for and receive a portable copy of your Personal Data that you have given us or that you have generated by using our services, so that you can:

- Move it;
- Copy it;
- Keep it for yourself; or
- Transfer it to another organization.

We will provide your Personal Data in a structured, commonly used, and machine-readable format. When you request this information electronically, we will provide you a copy in electronic format.

Rights related to automated decision-making including profiling

This is called the **right to data Rights in relation to automated decision-making including profiling** GDPR includes provisions for decisions made with no human involvement, such as profiling, which uses personal data to make calculated assumptions about individuals.

There are strict rules about this kind of processing, and individuals are permitted to challenge and request a review of the processing if they believe the rules aren't being followed.

Right to Withdraw Your Consent

Where we rely on your consent as the legal basis for processing your Personal Data, you may withdraw your consent at any time. If you withdraw your consent, our use of your Personal Data before you withdraw is still lawful.

If you have given consent for your details to be shared with a third party and wish to withdraw this consent, please also contact the relevant third party in order to change your preferences.

Please note that, if you change your mind about being sent marketing emails you can “opt out” at any time by clicking the “unsubscribe” link at the bottom of any marketing email. Once you “opt out”, you will no longer receive any marketing emails from us. We will continue to communicate with you regarding your service billing and support via email.

Right to Non-Discrimination

We will not discriminate against you for exercising any of your privacy rights. Unless the applicable data protection laws permit it, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits or imposing penalties;
- Provide you a different level or quality of goods or services; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

How Can You Exercise Your Privacy Rights?

To exercise any of the rights described above, please [contact us](#).

If the GDPR applies to our processing of your Personal Data, you have the right to lodge a complaint with the supervisory authority of the country in which you are located or to our [EU representative](#). You may also complain to the Information Commissioner's Office (“**ICO**”), which is the UK or to our [UK representative](#).

Verification of Your Identity

In order to correctly respond to your privacy rights requests, we need to confirm that YOU made the request. Consequently, we may require additional information to confirm that you are who you say you are.

We will only use the Personal Data you provide us in a request to verify your identity or authority to make the request.

Verification of Authority

If you are submitting a request on behalf of somebody else, we will need to verify your authority to act on behalf of that individual. When contacting us, please provide us with proof that the individual gave you signed permission to submit this request, a valid power of attorney on behalf of the individual, or proof of parental responsibility or legal guardianship. Alternatively, you may ask the individual to directly [contact us](#) to verify their identity and confirm with us that they gave you permission to submit this request.

Response Timing and Format of Our Responses

We will confirm the receipt of your request within ten (10) business days and, in that communication, we will also describe our identity verification process (if needed) and when you should expect a response, unless we have already granted or denied the request.

Please allow us up to a month to reply to your requests from the day we received your request. If we need more time (up to 90 days in total), we will inform you of the reason why and the extension period in writing. If we cannot satisfy a request, we will explain why in our response. For data portability requests, we will choose a format to provide your Personal Data that is readily useable and should allow you to transmit the information from one entity to another entity without difficulty.

We will not charge a fee for processing or responding to your requests. However, we may charge a fee if we determine that your request is excessive, repetitive, or manifestly unfounded. In those cases, we will tell you why we made that determination and provide you with a cost estimate before completing your request.

EU-U.S. and Swiss-U.S. Data Privacy Frameworks

With respect to Personal Data processed in the scope of this Policy, Numonix complies with the EU-U.S. Data Privacy Framework (and its UK Extension) and Swiss-U.S. Data Privacy Framework (the “**Data Privacy Framework**”) as adopted and set forth by the U.S. Department of Commerce regarding the processing of Personal Data. Numonix commits to adhere to and has certified to the Department of Commerce that it adheres to the Data Privacy Framework Principles.

To learn more about the Data Privacy Framework, and to view Numonix’s certification, please visit <https://www.dataprivacyframework.gov/s/> and <https://www.dataprivacyframework.gov/s/participant-search>, respectively.

Dispute Resolution

Where a privacy complaint or dispute relating to Personal Data received by Numonix in reliance on the Data Privacy Framework cannot be resolved through our internal processes, we have agreed to participate in the [VeraSafe Data Privacy Framework Dispute Resolution Procedure](#). Subject to the terms of the VeraSafe Data Privacy Framework Dispute Resolution Procedure, VeraSafe will provide appropriate recourse free of charge to you. To file a complaint with VeraSafe and participate in the VeraSafe Data Privacy Framework Dispute Resolution Procedure, please submit the required information here: <https://www.verasafe.com/privacy-services/dispute-resolution/submit-dispute/>.

If a complaint or dispute cannot be resolved through our internal process, we have also agreed to cooperate with the EU data protection authorities, the UK Information Commissioner’s Office, and the Swiss Federal Data Protection and Information Commissioner and to participate in the dispute resolution procedures of the panel established by such data protection authorities.

Binding Arbitration

If your dispute or complaint cannot be resolved by us, nor through the dispute resolution program established by VeraSafe, you may have the right to require that we enter into binding arbitration with you under the “[Recourse, Enforcement and Liability](#)” Principle and [Annex I](#) of the Data Privacy Framework.

<https://www.dataprivacyframework.gov/s/article/ANNEX-I-introduction-dpf?tabset-35584=2>

U.S. Regulatory Oversight

Numonix is subject to the investigatory and enforcement powers of the United States Federal Trade Commission.

Contact Us

If you have any questions about this Policy or our processing of your Personal Data, please submit a request by either:

Calling us at +1 (855) 686-6649 (domestic) or +1 (561) 952-2600 (international);

Contacting our Security Officer by email at dataprotection@numonix.cloud; or

Writing to us at:

Numonix LLC

Attn: Darren Poswell, Security Officer
2650 N. Military Trail, Suite 150
Boca Raton Florida, 33431 USA

Please allow up to 30 days for us to reply.

EU and UK Representative. We have appointed VeraSafe Ireland Ltd and VeraSafe United Kingdom Ltd. (“**VeraSafe**”) as our representative in the EU and UK, respectively, for data protection matters. While you may also contact us, VeraSafe can be contacted on matters related to the processing of Personal Data. To contact VeraSafe, please use this contact form: <https://www.verasafe.com/privacy-services/contact-article-27-representative>.

Alternatively, VeraSafe can be contacted at:

VeraSafe Ireland Ltd.

Unit 3D North Point House
North Point Business Park
New Mallow Road
Cork T23AT2P
Ireland

VeraSafe United Kingdom Ltd.

37 Albert Embankment
London SE1 7TL
United Kingdom

Other Terms

Industry Standard Security. Numonix has implemented and will maintain technical, administrative, and physical measures that are reasonably designed to help protect PII from unauthorized processing such as unauthorized access, disclosure, alteration, or destruction.

No Children Under Age 13. We do not intentionally gather Personal Data about visitors who are under the age of 13. If you believe your child’s data may have been inadvertently collected, please [contact us](#) to submit a deletion request.

No Contractual Rights. This Privacy Policy is not a contract and does not create any contractual rights or obligations.

Links to Third-Party Sites. Our Service may contain links to other sites and services, which are owned and controlled by others. These third-party websites have their own policies regarding privacy, and you should review those policies.

Revisions to this Policy. If we make any material change to this Policy, we will post the revised Policy to this web page. We will also update the “Last Updated” date.