

*Last Updated: September 22, 2020*

Pocket Protector™ recognize and respect your right to privacy. Each entity of Pocket Protector™ is acting as an independent data controller in the context of this Privacy Policy.

This Privacy Policy explains how Pocket Protector™ collects, shares, stores and uses data. Typically, we collect customer data in order to provide the products and services that customers purchase or request from us. For example, we may capture email addresses so that a customer can check the status of its software or open a case with our tech support team. We collect visitor data through the Website in order to understand and improve the Website content, as well as maintain a secure computing environment. We collect marketing data in order to respond to inquiries about our products and services and provide access to the latest topical information that potential customers might be interested in.

When we collect data, we do so in compliance with this Privacy Policy, which describes how we handle the data we collect in more detail. This Privacy Policy also describes other important topics relating to information privacy.

**Please read this Privacy Policy carefully to understand how we handle your Personal Information.**

By accessing or browsing [www.PocketProtector.com](http://www.PocketProtector.com) (the “**Website**”) and/or using any of the services that we provide to you or that you access, you confirm that you have read and understood the entirety of this Privacy Policy.

1. Types of Information Collected.

We may collect and process any of the following information about you, which we refer to as “**Personal Information**” throughout this Privacy Policy:

**1.1 Information You Give Us.**

You may give us information about yourself by using the online forms provided on the Website or by contacting us by phone, e-mail or other means. This includes, for example, filling in the “Contact Us” form on the Website or when you provide your information to us in order to receive our services.

The information you give us may include email address, name, mailing address, telephone number, company name, company address, credit card information, job title, account information and any updates to information provided to us.

Please note that we need certain types of information so that we can provide services to you. If you do not provide us with such information, or if you ask us to delete it, you may no longer be able to access our services.

### **1.2 Information We May Collect About You.**

We may automatically collect any of the following information each time you visit the Website:

- Technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, domain name and country that requests information, the file(s) requested, browser type and version, browser plug-in types and versions, operating system and platform; and
- Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from the Website (including date and time), length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page.

### **1.3 Information We May Receive From Other Sources.**

We will receive information about you if:

- You obtain our services through one of our resellers or partners. The types of information that we may receive are the same as the information that you may give to us detailed in section 1.1 above.
- You use any of the other websites we operate or the other services we provide. In this case, we will inform you when we collect that data that it may be shared internally and combined with data collected on the Website. We work closely with third parties (including, for example, advertising networks, and analytics and search information providers) and may receive information about you from them.
- Some Pocket Protector™ products use Google Analytics for purposes of improving product performance. For more information on Google Analytics, and how it collects and processes data visit the site “How Google Uses Information From Sites or Apps that Use our Services,” located at <https://policies.google.com/technologies/partner-sites>.

## **2. Use of Information.**

We, or third-party data processors acting on our behalf, collect, use, process and store the Personal Information listed above for the following purposes:

- a. On the basis of the contract you have with us, as necessary in order to deliver your contracted services and to carry out our obligations arising from the contract;
- b. On the basis of your consent, in order to provide you with information, products or services which we feel may interest you;
- c. On the basis of our legitimate interests, as necessary in order:
  - To register you for webinars/seminars.
  - To assign a password.
  - To ensure that content from the Website and services is presented in the most efficient manner for you.
  - To provide you with information, products or services that you request from us.

- To allow you to participate in interactive features (e.g., live chat) when you choose to do so.
  - To notify you about changes to our products or services and to keep you informed about our fees and charges.
  - To provide the service(s) you have requested.
  - To improve the quality and accuracy of the services.
  - To allow you to access and use the Website and to register for an account.
  - To ensure the security of our services and the Website.
  - To manage litigation, to answer competent authorities' requests, to comply with non-EU legal obligations to which we are subject, and to pursue debt.
  - To verify your identity in order to prevent and detect money laundering and fraud.
  - To carry out statistical analysis and market research.
  - For marketing, advertising and promotional purposes to the extent your consent is not required.
  - For the purposes of improving and maintaining the Website, preparing reports or compiling statistics in order to improve our services. Such details will be anonymized as much as reasonably possible.
  - To take other action you request when you supply the Personal Information.
- d. On the basis of the legal obligation to which we are subject, as necessary for compliance with such obligation.

Personal Information is not used to profile those who access the Website.

### **3. Data Retention.**

We retain Personal Information for as long as you use the services we provide and then as required to comply with applicable laws.

### **4. Disclosure of Information.**

We will not sell, hire, lease or rent your Personal Information that we collect to any third party without notifying you and/or obtaining your consent, except as expressly set forth in this section. Where you have given your consent for us to use your information in a particular way, but later change your mind, you must contact us as set forth in the Contact Us section of this Privacy Policy in order to revoke such consent.

#### ***4.1 Pocket Protector™ Affiliate Companies.***

We will share your Personal Information with any company that is a member of our group, including those that are listed in this Privacy Policy.

#### ***4.2 Categories of Third Parties.***

Any third parties with whom we share your Personal Information are limited (by law and by contract) in their ability to use your Personal Information for any purpose other than to provide services for us. We will always ensure that any third parties with whom we

share your Personal Information are subject to privacy and security obligations consistent with this Privacy Policy and applicable laws. We will share your Personal Information with the following categories of third parties:

- Our service providers and subcontractors including, but not limited to, payment processors, suppliers of technical and support services and cloud service providers;
- Companies that assist us in our marketing, advertising and promotional activities;
- Analytics and search engine providers that assist us in the improvement and optimization of the Website; and
- Systems integrators and service providers who resell our products and services.

#### **4.3 Other Third Party Disclosures.**

We will also disclose your Personal Information to third parties:

- In the event we sell or buy any business or assets, in which case we may disclose your Personal Information to the prospective seller or buyer of such business or asset;
- If Pocket Protector™, or substantially all of its assets, is acquired by a third party, in which case information held by it about its customers and partners will be one of the transferred assets;
- If Pocket Protector™ is under a duty to disclose or share your Personal Information in order to comply with any legal obligation or any lawful request from government or law enforcement officials, and as may be required to meet national security or law enforcement requirements, or prevent illegal activity;
- In order to enforce or apply Pocket Protector™'s terms and conditions or any other agreement, or to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or
- To protect the rights, property or safety of Pocket Protector™, our customers or other persons. This may include exchanging information with other organizations for the purposes of fraud protection and credit risk reduction.

#### **5. Protection of Personal Information.**

Pocket Protector™ is committed to taking steps to protect Personal Information you provide to us, including administrative, technical and physical measures to safeguard Personal Information against loss, theft, misuse, unauthorized access, disclosure, alteration and destruction.

Personal Information is only accessed by authorized staff who are instructed to handle Personal Information in a confidential manner. Personal Information is protected by firewalls and standard industry security measures. We may also transmit sensitive information and transactional data using secure socket layer (SSL) encryption.

The transmission of information through the Internet is not completely secure. Although we will do our best to protect Personal Information, we cannot guarantee the security of

your data transmitted to the Website; any transmission is at your own risk. Once we have received your Personal Information, we will use strict procedures and security features to try to prevent unauthorized access.

Where we have given you (or where you have chosen) a password that enables you to access certain parts of the Website or our products and services, you are responsible for keeping this password confidential. We ask you not to share the password with anyone.

## **6. Your Rights.**

Subject to the conditions set forth under applicable law, you have the right to request to access, review, correct, update, suppress, restrict or delete Personal Information that you have provided to us. You have the right to request an electronic copy of Personal Information for purposes of transmitting it to another company. You have the right to not be subject to a decision based solely on automated processing, including profiling. You may submit such requests by sending an email to [legal@pocketprotector.com](mailto:legal@pocketprotector.com). We will respond to your request in accordance with applicable law. In your request, you must advise what Personal Information you would like to access, review, correct, update, suppress, restrict or delete; or otherwise let us know what limitations you would like to put on our use of your Personal Information.

Please note that we may need to retain certain Personal Information for recordkeeping purposes and/or to complete transactions that you began prior to requesting a change or deletion. In the event your Personal Information is processed on the basis of your consent, you may withdraw consent at any time by sending an email to [legal@pocketprotector.com](mailto:legal@pocketprotector.com) and specifying the details of your request. However, any withdrawal of consent will not affect the lawfulness of any processing based on consent before it is withdrawn.

You may lodge a complaint with a supervisory authority, in particular in your Member State of residence, if you consider that the collection and use of your Personal Information infringes this Privacy Policy or applicable law. You have the right to ask us to not process your Personal Information for marketing purposes. We will inform you before collecting your Personal Information if we intend to use your Personal Information for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your Personal Information. Alternatively, you can contact us by email at [legal@pocketprotector.com](mailto:legal@pocketprotector.com) at any time.

If you have previously given us consent to use your Personal Information for marketing purposes, you can choose to stop receiving marketing communications that we send to you from time to time by following the unsubscribe instructions included in such communications. Alternatively, you can opt out of such communications at any time by contacting us by email at [legal@pocketprotector.com](mailto:legal@pocketprotector.com)

You can choose to opt-out from your Personal Information being used for any purpose that differs from the purposes notified to you when we collected your Personal information or from being disclosed to any third party.

If you would like to opt out, please contact us as set forth in the Contact Us section of this Privacy Policy. **Please note that opting-out may prevent us from providing you with our services or information requested by you.**

## 7. Transfers of Information.

Pocket Protector™ is an international business with multi-national operations, systems and processes. In this context, the Personal Information that Pocket Protector™ collects from you may be transferred to and stored in the United States or another location outside of the EEA or Switzerland, i.e., *Australia, China, Hong-Kong, India, Malaysia, Singapore, and the UK.*

With respect to Personal Information transferred outside the European Economic Area (“**EEA**”) or Switzerland, we will process Personal Information in accordance with applicable privacy laws by implementing appropriate safeguards.

While Pocket Protector™ remains self-certified under the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework, it is not currently relying on these frameworks for the transfers of Personal Information. Indeed, we rely on Standard Contractual Clauses (“**SCC**”) as adopted by the European Commission, a copy of which may be requested at [legal@pocketprotector.com](mailto:legal@pocketprotector.com).

We will always ensure that such transfers comply with applicable privacy laws, and we will take all reasonable precautions to ensure that your Personal Information is treated securely and in accordance with this Privacy Policy.

For additional Information on U.S. Privacy Safeguards Relevant to SCCs and other EU Legal Bases for EU-U.S. Data Transfers after *Schrems II*, please click [here](#) for the White Paper jointly issued on September 2020 by the U.S. Department of Commerce (DOC), Department of Justice (DOJ), and the Office of the Director of National Intelligence (ODNI).

## 8. Use of Cookies.

### 8.1 What Are Cookies and Related Technologies

Cookies are small data files that are stored on your computer that allow us and our third-party partners and providers to collect certain information about your interactions with our email communications, websites and other online services. We and our third-party partners and providers may also use other related technologies to collect this information, such as web beacons, pixels, embedded scripts, location-identifying technologies and logging technologies (collectively, “cookies”).

### 8.2 What We Collect When Using Cookies

We and our third-party partners and providers may use cookies to automatically collect certain types of usage information when you visit or interact with our email communications, websites and other online services. For example, we may collect log data about your device and its software, such as your IP address, operating system, browser type, date/time of your visit, and other similar information. We may collect analytics data or use third-party analytics tools such as Google Analytics to help us measure usage and activity trends for our online services and better understand our customer base.

To view the types of cookies Pocket Protector™ uses on the Website, please [click here](#).

### **8.3 How We Use That Information**

We use or may use the data collected through cookies to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit our websites and online services; (b) provide and monitor the effectiveness of our websites and online services; (c) monitor online usage and activities of our websites and online services; (d) diagnose errors and problems with our websites and online services; (e) otherwise plan for and enhance our online services; and (f) facilitate the purposes identified in this Privacy Policy. We and our advertising partners also use the information we collect through cookies to understand your browsing activities, including across unaffiliated third-party sites, so that we can deliver ads and information about products and services that may be of interest to you.

Please note that we link some of the Personal Information we collect through cookies with the other Personal Information that we collect about you and for the purposes described in this Privacy Policy.

### **8.4 Your Choices About Cookies**

If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) disable existing cookies; or (iii) set your browser to automatically reject cookies. Please note that doing so may negatively impact your experience using our online services, as some features and services on our online services may not work properly. Depending on your device and operating system, you may not be able to delete or block all cookies. In addition, if you want to reject cookies across all your browsers and devices, you will need to do so on each browser on each device you actively use. You may also set your email options to prevent the automatic downloading of images that may contain technologies that would allow us to know whether you have accessed our email and performed certain functions with it.

Some Pocket Protector™ products use Google Analytics for purposes of improving product performance. For more information on Google Analytics, and how it collects and processes data visit the site “How Google Uses Information From Sites or Apps that Use our Services,” located at <https://policies.google.com/technologies/partner-sites>.

### **8.5 Your Choices About Online Ads**



We support the self-regulatory principles for online behavioral advertising (Principles) published by the Digital Advertising Alliance (DAA). This means that we allow you to exercise choice regarding the collection of information about your online activities over time and across third-party websites for online interest-based advertising purposes. More information about these Principles can be found at [www.aboutads.info](http://www.aboutads.info) If you want to opt out of receiving online interest-based advertisements on your internet browser from advertisers and third parties that participate in the DAA program and perform advertising-related services for us and our partners, please follow the instructions at [www.aboutads.info/choices](http://www.aboutads.info/choices), or <http://www.networkadvertising.org/choices/> to place an opt-out cookie on your device indicating that you do not want to receive interest-based advertisements. Opt-out cookies only work on the internet browser and device they are downloaded onto. If you want to opt out of interest-based advertisements across all of your browsers and devices, you will need to opt out on each browser on each device you actively use. If you delete cookies on your device generally, you will need to opt out again.

If you want to opt out of receiving online interest-based advertisements on mobile apps, please follow the instructions at <http://www.aboutads.info/appchoices>.

Please note that when you opt out of receiving interest-based advertisements, this does not mean you will no longer see advertisements from us or on our online services. It means that the online ads that you do see from DAA program participants should not be based on your interests. We are not responsible for the effectiveness of, or compliance with, any third-parties' opt-out options or programs or the accuracy of their statements regarding their programs. In addition, third parties may still use cookies to collect information about your use of our online services, including for analytics and fraud prevention as well as any other purpose permitted under the DAA's Principles.

#### **9. Third Party Websites.**

The Website may, from time to time, contain links to other websites operated by third parties. Please note that this Privacy Policy applies solely to the information collected from the Website, and we cannot be responsible for Personal Information collected and stored by third parties. If you choose to visit any websites operated by third parties, then their privacy policies would apply, and you should carefully read such third parties' privacy policies before submitting any Personal Information to those websites. We do not endorse or otherwise accept any responsibility or liability for the content of such third-party websites, terms and conditions or policies.

#### **10. Changes to the Privacy Policy.**

We may update this Privacy Policy from time to time. By continuing to use the services and the Website, you agree to the latest version of this Privacy Policy. Any future changes we make to this Privacy Policy will be posted on this page and, where appropriate, you will be notified of such changes via email. Please visit this page frequently to check for any updates or changes to this Privacy Policy.



If you have any questions regarding this Privacy Policy or our use of Personal Information on the Website, please send us your questions or comments as set forth in Section 11 below.

#### **11. Contact Us.**

If you have any questions in relation to this Privacy Policy or how we collect, use or store your Personal Information, you can contact us by telephone at: +1 408-342-5400, by mail at Pocket Protector™ ., 1000 Sanger Ave, Oceanport, NJ 07757, or by email at [legal@pocketprotector.com](mailto:legal@pocketprotector.com).