

# Privacy Policy

Effective as of November 19, 2021.

This Privacy Policy describes the privacy practices of Verituity, Inc. and any of its affiliates ("**Verituity**," "**we**", "**us**" or "**our**") and how we handle personal information that we collect through our digital properties that link to this Privacy Policy, including our website (collectively, the "**Service**"), as well as through social media, our marketing activities, and other activities described in this Privacy Policy.

Verituity provides a SaaS platform that helps organizations enable verified, digital transaction so their customers can trust the digital arena. This Privacy Policy does not apply to information that we process on behalf of our enterprise customers while providing the Verituity platform to them. Our use of this information is restricted by our agreements with the relevant enterprise customers. If you have concerns regarding personal information that we process on behalf of an enterprise customer, please direct your concerns to the relevant enterprise customer.

Verituity may also provide additional or supplemental privacy notices to individuals for specific products or services that we offer at the time we collect personal information. For example, we may provide a privacy statement to our enterprise customers' users or to individuals when they register for an account with us. These additional or supplemental product privacy statements will govern how we may process that information.

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## Personal information we collect

**Information you provide to us.** Personal information you may provide to us through the Service or otherwise includes:

- **Contact data**, such as your first and last name, salutation, email address, mailing and billing address, professional title and company name, and phone number.
- **Communications data** that we exchange with you, including when you contact us with questions or feedback, through the Service or otherwise.
- **Profile data**, such as the username and password that you may set to establish an online account with us, date of birth, and any other information that you add to your profile.
- **Marketing data**, such as your preferences for receiving our marketing communications and details about your engagement with them.
- **Government-issued identification numbers**, such as national identification number (e.g. Social Security Number, tax identification number, passport number), state or local identification number (e.g., driver's license or state ID number), and an image of the relevant identification card.
- **Payment information** needed to complete transactions, including payment type information or bank account number.
- **Other data** not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

**Third-party sources.** We may combine personal information we receive from you with personal information we obtain from other sources, such as:

- **Public sources**, such as government agencies, public records, social media platforms, and other publicly available sources.
- **Data providers**, such as information services and data licensors that provide demographic and other information.
- **Our affiliate partners**, such as our affiliate network provider and publishers, influencers, and promoters who participate in our paid affiliate programs.
- **Marketing partners**, such as joint marketing partners and event co-sponsors.

If you choose to login to the Service via a third-party platform or social media network, or otherwise connect your account on the third-party platform or network to your account through the Service, we may collect information from that platform or network. For example, this information may include your Facebook username, user ID, profile picture, cover photo, and networks to which you belong (e.g. school, workplace). You may also have the opportunity to provide us with additional information via the third-party platform or network, such as a list of your friends or connections and your email address.

**Automatic data collection.** We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your interaction over time with the Service, our communications and other online services, such as:

- **Device data**, such as your computer's or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers (including identifiers used for advertising purposes), language settings, mobile device carrier, radio/network information (e.g., Wi-Fi, LTE, 3G), and location information such as city, state, latitude, longitude, or geographic area (all of which may be controlled from your mobile device).
- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing to the Service, navigation paths between pages or screens, information about your activity on a page or screen, access times and duration of access, and whether you have opened our marketing emails or clicked links within them.

**Cookies and similar technologies.** Some of our automatic data collection is facilitated by cookies and similar technologies, as outlined below. For more information, see our [Cookie Notice](#).

Like many online services, we may use the following technologies:

- **Cookies**, which are text files that websites store on a visitor's device to uniquely identify the visitor's browser or to store information or settings in the browser for the purpose of helping you navigate between pages efficiently, remembering your preferences, enabling functionality, helping us understand user activity and patterns, and facilitating analytics and online advertising.
- **Local storage technologies**, like HTML5 and Flash, that provide cookie-equivalent functionality but can store larger amounts of data, including on your device outside of your browser in connection with specific applications.
- **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email address was accessed or opened, or that certain content was viewed or clicked.
- **Software Development Kits (SDKs)**, which are used to incorporate third party computer code into the Service that allows our third party service providers or advertising partners to collect data directly from the Service for a variety of purposes, including to provide us with analytics regarding the use of the Service, to integrate with social media, add features or functionality to the Service, or to facilitate online advertising.

## How we use your personal information

We may use your personal information for the following purposes or as otherwise described at the time of collection:

**Service delivery.** We may use your personal information to:

- provide, operate and improve the Service and our business;
- establish and maintain your user profile on the Service;
- communicate with you about the Service, including by sending announcements, updates, security alerts, and support and administrative messages;
- understand your needs and interests, and personalize your experience with the Service and our communications; and
- provide support for the Service, and respond to your requests, questions and feedback.

**Research and development.** We may use your personal information for research and development purposes, including to analyze and improve the Service and our business. As part of these activities, we may create aggregated, de-identified, or other anonymous data from personal information we collect. We make personal information into anonymous data by removing information that makes the data personally identifiable to you. Where appropriate, we will de-identify your personal information prior to such internal use. We may use this anonymous data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

**Marketing and advertising.** We, our service providers and our third-party advertising partners may collect and use your personal information for marketing and advertising purposes:

- **Direct marketing.** We may send you Verituity-related or other direct marketing communications as permitted by law. You may opt-out of our marketing communications as described in the [Opt-out of marketing](#) section below.

**Compliance and protection.** We may use your personal information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements or our internal policies;
- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

**With your consent.** In some cases, we may specifically ask for your consent to collect, use or share your personal information, such as when required by law.

## How we share your personal information

We may share your personal information with the following parties and as otherwise described in this Privacy Policy or at the time of collection.

**Affiliates.** Our corporate parent, subsidiaries, and affiliates, for purposes consistent with this Privacy Policy.

**Service providers.** Third parties that provide services on our behalf or help us operate the Service or our business (such as hosting, information technology, customer support, email delivery, marketing, and website analytics).

**Payment processors.** Any payment card information you use to make or receive a payment on the Service is collected and processed directly by our payment processors. You may also sign up to be billed by your mobile communications provider, who may use your payment data in accordance with their privacy policies.

**Third parties designated by you.** We may share your personal data with third parties where you have instructed us or provided your consent to do so. For example, we may share your personal information with the relevant bank, merchant, additional payor/payee, or any other stakeholder necessary to complete your payment. We will share personal information that is needed for these other companies to provide the services that you have requested.

**Third-party platforms and social media networks.** If you have enabled features or functionality that connect the Service to a third-party platform or social media network (such as by logging in to the Service using your account with the third-party, providing your API key or similar access token for the Service to a third party, or otherwise linking your account with the Service to a third party's services), we may disclose the personal information that you authorized us to share. We do not control the third party's use of your personal information.

**Professional advisors.** Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

**Authorities and others.** Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the [compliance and protection purposes](#) described above.

**Business transferees.** Acquirers and other relevant participants in business transactions (or negotiations and due diligence for such transactions) involving a corporate divestiture, merger, consolidation, acquisition, reorganization, sale or other disposition of all or any portion of the business or assets of, or equity interests in, [CompanyName] or our affiliates (including, in connection with a bankruptcy or similar proceedings).

## Your choices

You have the following choices with respect to your personal information.

**Access or update your information.** If you have registered for an account with us through the Service, you may review and update certain account information by logging into the account.

**Opt-out of marketing communications.** You may opt-out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by [contacting us](#). Please note that if you choose to opt-out of marketing-related emails, you may continue to receive service-related and other non-marketing emails.

**Cookies.** For information about cookies employed by the Service and how to control them, see our [Cookie Notice](#).

**Mobile location data.** You can disable our access to your device's precise geolocation in your mobile device settings.

**Do Not Track.** Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" or similar signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

**Declining to provide information.** We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

**Third-party platforms.** If you choose to connect to the Service through your social media account or other third-party platform, you may be able to use your settings in your account with that platform to limit the information we receive from it. If you revoke our ability to access information from a third-party platform, that choice will not apply to information that we have already received from that third party.

**Delete data or close your account.** You can choose to delete certain profile data in your account or you can request to close your account by [contacting us](#).

## Other sites and services

The Service may contain links to websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions. We encourage you to read the privacy policies of the other websites and mobile applications and online services you use.

## Security

We employ a number of technical, organizational and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal information.

## International data transfer

We are headquartered in the United States and may use service providers that operate in other countries. Your personal information may be transferred to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country.

## Children

The Service is not intended for use by children under 13, and we do not permit children under 13 to use the Service or otherwise enter any information about themselves. Further, the Service is not intended for use by children 13 and over but under 18 years of age, unless a parent originates the process of payout to a minor child. If we learn that we have collected personal information through the Service from a child under 18 without the consent of the child's parent or guardian as required by law, we will delete it. We encourage parents or guardians with concerns to contact us.

## Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service. If required by law we will also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via email or another manner through the Service. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Service after the effective date of any modified Privacy Policy indicates your acceptance of the modified Privacy Policy.

## How to contact us

- **Email:** [privacy@verituity.com](mailto:privacy@verituity.com)
- **Mail:** 6861 Elm Street, Suite 100, McLean, VA 22101

# You California privacy rights notice

**Scope.** This section applies only to California residents. It describes how we collect, use, and share Personal Information of California residents in our capacity as a “business” under the California Consumer Privacy Act (“**CCPA**”) and their rights with respect to that Personal Information. For purposes of this section, the term “**Personal Information**” has the meaning given in the CCPA but does not include information exempted from the scope of the CCPA. In some cases, we may provide a different privacy notice to certain categories of California residents, in which case that notice will apply instead of this section.

Please note, this section does not apply to the information that we process on behalf of our enterprise customers while providing the Verituity platform to them, as described above. If you have concerns regarding personal information that we process on behalf of an enterprise customer, please direct your concerns to the relevant enterprise customer.

**Your California privacy rights.** As a California resident, you have the rights listed below. However, these rights are not absolute, and in certain cases we may decline your request as permitted by law.

- **Information.** You can request the following information about how we have collected and used your Personal Information during the past 12 months:
  - The categories of Personal Information that we have collected.
  - The categories of sources from which we collected Personal Information.
  - The business or commercial purpose for collecting and/or selling Personal Information.
  - The categories of third parties with whom we share Personal Information.
  - The categories of Personal Information that we sold or disclosed for a business purpose.
  - The categories of third parties to whom the Personal Information was sold or disclosed for a business purpose.
- **Access.** You can request a copy of the Personal Information that we have collected about you during the past 12 months.
- **Deletion.** You can ask us to delete the Personal Information that we have collected from you.
- **Opt-out of sales.** You can opt-out any sale of your Personal Information.
- **Opt-in.** If we know that you 16 years of age, we will ask for your affirmative authorization to sell your Personal Information before we do so.
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination as prohibited by the CCPA.

**Right to information, access and deletion.** You may submit requests to exercise your right to information, access or deletion via email to [privacy@verituity.com](mailto:privacy@verituity.com).

**Personal information that we collect, use and disclose.** The chart below summarizes the Personal Information we collect by reference to the categories of Personal Information specified in the CCPA, and describes our practices currently and during the 12 months preceding the effective date of this Privacy Policy. Information you voluntarily provide to us, such as in free-form webforms, may contain other categories of personal information not described below.

Statutory category of	PI we collect in this	Source of PI	Business/ commercial	Categories of third parties	Categories of third parties
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<b>personal information (PI)</b> (Cal. Civ. Code § 1798.140)	<b>category</b> (See Personal information we collect above for description)		<b>purpose for collection</b>	<b>to whom we “disclose” PI for a business purpose</b>	<b>to whom we “sell” PI</b>
<b><u>Identifiers</u></b>	<ul style="list-style-type: none"> <li>● <i>Contact data</i></li> <li>● <i>Profile data</i></li> <li>● <i>Data about others</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>You</i></li> <li>● <i>Third-party sources</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Service delivery</i></li> <li>● <i>Research &amp; development</i></li> <li>● <i>Marketing &amp; advertising</i></li> <li>● <i>Compliance &amp; protection</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Affiliates</i></li> <li>● <i>Service providers</i></li> <li>● <i>Payment processors</i></li> <li>● <i>Advertising partners</i></li> <li>● <i>Third parties designated by you</i></li> <li>● <i>Professional advisors</i></li> <li>● <i>Authorities and others</i></li> <li>● <i>Business transferees</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Advertising partners (to facilitate online advertising)</i></li> </ul>
<b><u>California Customer Records</u></b> (as defined in California Civil Code section 1798.80)	<ul style="list-style-type: none"> <li>● <i>Contact data</i></li> <li>● <i>Data about others</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>You</i></li> <li>● <i>Third-party sources</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Service delivery</i></li> <li>● <i>Research &amp; development</i></li> <li>● <i>Marketing &amp; advertising</i></li> <li>● <i>Compliance &amp; protection</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Affiliates</i></li> <li>● <i>Service providers</i></li> <li>● <i>Payment processors</i></li> <li>● <i>Advertising partners</i></li> <li>● <i>Third parties designated by you</i></li> <li>● <i>Professional advisors</i></li> <li>● <i>Authorities and others</i></li> <li>● <i>Business transferees</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Advertising partners (to facilitate online advertising)</i></li> </ul>
<b><u>Commercial Information</u></b>	<ul style="list-style-type: none"> <li>● <i>Marketing data</i></li> <li>● <i>Online activity data</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>You</i></li> <li>● <i>Third-party sources</i></li> <li>● <i>Automatic collection</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Service delivery</i></li> <li>● <i>Research &amp; development</i></li> <li>● <i>Marketing &amp; advertising</i></li> <li>● <i>Compliance &amp; protection</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Affiliates</i></li> <li>● <i>Service providers</i></li> <li>● <i>Payment processors</i></li> <li>● <i>Advertising partners</i></li> <li>● <i>Third parties designated by you</i></li> <li>● <i>Professional advisors</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Advertising partners (to facilitate online advertising)</i></li> </ul>

				<ul style="list-style-type: none"> <li>• Authorities and others</li> <li>• Business transferees</li> </ul>	
<b><u>Financial Information</u></b>	N/A	N/A	N/A	N/A	None
<b><u>Online Identifiers</u></b>	<ul style="list-style-type: none"> <li>• Profile data</li> <li>• Device data</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Third-party sources</li> <li>• Automatic collection</li> </ul>	<ul style="list-style-type: none"> <li>• Service delivery</li> <li>• Research &amp; development</li> <li>• Marketing &amp; advertising</li> <li>• Compliance &amp; protection</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Service providers</li> <li>• Payment processors</li> <li>• Advertising partners</li> <li>• Third parties designated by you</li> <li>• Professional advisors</li> <li>• Authorities and others</li> <li>• Business transferees</li> </ul>	<ul style="list-style-type: none"> <li>• Advertising partners (to facilitate online advertising)</li> </ul>
<b><u>Internet or Network Information</u></b>	<ul style="list-style-type: none"> <li>• Marketing data</li> <li>• Device data</li> <li>• Online activity data</li> </ul>	<ul style="list-style-type: none"> <li>• Automatic collection</li> </ul>	<ul style="list-style-type: none"> <li>• Service delivery</li> <li>• Research &amp; development</li> <li>• Marketing &amp; advertising</li> <li>• Compliance &amp; protection</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Service providers</li> <li>• Payment processors</li> <li>• Advertising partners</li> <li>• Third parties designated by you</li> <li>• Professional advisors</li> <li>• Authorities and others</li> <li>• Business transferees</li> </ul>	<ul style="list-style-type: none"> <li>• Advertising partners (to facilitate online advertising)</li> </ul>
<b><u>Geolocation Data</u></b>	<ul style="list-style-type: none"> <li>• Device data</li> <li>• Location data</li> </ul>	<ul style="list-style-type: none"> <li>• Automatic collection</li> </ul>	<ul style="list-style-type: none"> <li>• Service delivery</li> <li>• Research &amp; development</li> <li>• Marketing &amp; advertising</li> <li>• Compliance &amp; protection</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Service providers</li> <li>• Payment processors</li> <li>• Advertising partners</li> <li>• Third parties designated by you</li> <li>• Professional advisors</li> </ul>	<ul style="list-style-type: none"> <li>• Advertising partners (to facilitate online advertising)</li> </ul>

				<ul style="list-style-type: none"> <li>• Authorities and others</li> <li>• Business transferees</li> </ul>	
<b><u>Inferences</u></b>	<p>May be derived from your:</p> <ul style="list-style-type: none"> <li>• Contact data</li> <li>• Profile data</li> <li>• Marketing data</li> <li>• Device data</li> <li>• Online activity data</li> </ul>	N/A	<ul style="list-style-type: none"> <li>• Service delivery</li> <li>• Research &amp; development</li> <li>• Marketing &amp; advertising</li> <li>• Compliance &amp; protection</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Service providers</li> <li>• Advertising partners</li> <li>• Authorities and others</li> <li>• Business transferees</li> </ul>	<ul style="list-style-type: none"> <li>• Advertising partners (to facilitate online advertising)</li> </ul>
<b><u>Protected Classification Characteristics</u></b>	We do not intentionally collect this information but it may be revealed in identity data or other information we collect	N/A	N/A	N/A	No
<b><u>Sensory Information</u></b>	N/A	N/A	N/A	N/A	No

# Notice to European users

The information provided in this “Notice to European users” section applies only to individuals in the United Kingdom, Switzerland, and the European Economic Area (hereafter collectively referred to as “Europe”). Please note, this section does not apply to the information that we process on behalf of our enterprise customers while providing the Verituity platform to them, as described above. If you have concerns regarding personal information that we process on behalf of an enterprise, please direct your concerns to the relevant enterprise customer.

**Personal information.** References to “personal information” in this Privacy Policy are equivalent to “personal data” governed by European data protection legislation.

**Controller.** [CompanyName] is the controller of your personal information covered by this Privacy Policy for purposes of European data protection legislation.

**EU/UK Representative.** Our data protection representative in the European Union/United Kingdom is [privacy@verituity.com](mailto:privacy@verituity.com)

**Legal bases for processing.** We use your personal information only as permitted by law. Our legal bases for processing the personal information described in this Privacy Policy are described in the table below.

<b>Processing purpose</b> <i>Details regarding each processing purpose listed below are provided in the section</i>	<b>Legal basis</b>
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<i>above titled "How we use your personal information".</i>	
<b>For Service delivery</b>	Processing is necessary to perform the contract governing our provision of our services or to take steps that you request prior to signing up for the services. If we have not entered into a contract with you, we process your personal information based on our legitimate interest in providing the services you access and request.
<ul style="list-style-type: none"> <li>● <b>For research and development</b></li> <li>● <b>For marketing and advertising purposes</b></li> <li>● <b>Compliance and protection purposes</b></li> <li>● <b>Sharing your personal information as described in this Privacy Policy</b></li> </ul>	These activities may constitute our legitimate interests, may be necessary to perform the contract governing our provision of our services or to take steps that you request prior to signing up for the services, or may be based on your consent. To the extent that these activities constitute our legitimate interests, we do not use your personal information for these activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
<b>To comply with applicable law</b>	Processing is necessary to comply with our legal obligations.
<b>With your consent</b>	Processing is based on your consent. Where we rely on your consent you have the right to withdraw it any time in the manner indicated when you consent or in the services.

**Use for new purposes.** We may use your personal information for reasons not described in this Privacy Policy where permitted by law and the reason is compatible with the purpose for which we collected it. If we need to use your personal information for an unrelated purpose, we will notify you and explain the applicable legal basis.

**Retention.** We retain personal information only for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for compliance and protection purposes.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

When we no longer require the personal information we have collected about you, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible. If we anonymize your personal information (so that it can no longer be associated with you), we may use this information indefinitely without further notice to you.

**Sensitive personal information.** We ask that you not provide us with any sensitive personal information

(e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the services, or otherwise to us.

If you provide us with any sensitive personal information to us when you use the services, you must consent to our processing and use of such sensitive personal information in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal information, you must not submit such sensitive personal information through our services.

**Your rights.** European data protection laws give you certain rights regarding your personal information. If you are located in Europe, you may ask us to take the following actions in relation to your personal information that we hold:

- **Access.** Provide you with information about our processing of your personal information and give you access to your personal information.
- **Correct.** Update or correct inaccuracies in your personal information.
- **Delete.** Delete your personal information.
- **Transfer.** Transfer a machine-readable copy of your personal information to you or a third party of your choice.
- **Restrict.** Restrict the processing of your personal information.
- **Object.** Object to our reliance on our legitimate interests as the basis of our processing of your personal information that impacts your rights.

You may submit these requests by email to [privacy@verituity.com](mailto:privacy@verituity.com) or our postal address provided above. We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions. If you would like to submit a complaint about our use of your personal information or our response to your requests regarding your personal information, you may contact us or submit a complaint to the data protection regulator in your jurisdiction.

**Cross-border data transfer.** If we transfer your personal information from Europe to another country such that we are required to apply appropriate safeguards, such as the Standard Contractual Clauses (according to EU Commission Decision 87/2010/EC or any future replacement), to your personal information under European data protection laws, we will do so. Please contact us for further information about any such transfers or the specific safeguards applied.

# Cookie Notice

This Cookie Notice explains how Verituity, Inc. (“Verituity”, “we”, “us” or “our”) uses cookies and similar technologies in connection with the [\[website\]](#) website and [www.Verituity.com](http://www.Verituity.com) and any other website that we own or control and which posts or links to this Cookie Notice (collectively, the “Sites”); and

## What are cookies?

Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies serve different purposes, like helping us understand how a site is being used, letting you navigate between pages efficiently, remembering your preferences, and generally improving your browsing experience.

Our Sites may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer or mobile device until you delete them).

We use two broad categories of cookies: (1) first party cookies, served directly by us to your computer or mobile device, which we use to recognize your computer or mobile device when it revisits our Sites; and (2) third-party cookies, which are served by service providers or business partners on our Sites, and can be used by these parties to recognize your computer or mobile device when it visits other websites. Third-party cookies can be used for a variety of purposes, including site analytics, advertising, and social media features.

## What types of cookies and similar tracking technologies does Verituity use on the Sites?

On the Sites, we use cookies and other tracking technologies in the following categories described in the table below.

Type	Description	Who serves the cookies (link to privacy policy/site)	How to control them
<i>Advertising</i>	These cookies are used by advertising companies to collect information about how you use our Sites and other websites over time. These companies use this information to show you ads they believe will be relevant to you within our services and elsewhere, and to measure how the ads perform.	<a href="#">Google Doubleclick</a> <a href="#">Facebook</a>	You can opt-out of Google Doubleclick cookies <a href="#">here</a> .  You can opt-out of Facebook cookies <a href="#">here</a> .  See ‘your choices’ below.

<i>Analytics</i>	These cookies help us understand how our services is performing and being used. These cookies may work with web beacons included in emails we send to track which emails are opened and which links are clicked by recipients.	<a href="#">Google Analytics</a>	You can find out more information about Google Analytics cookies <a href="#">here</a> and about how Google protects your data <a href="#">here</a> . You can prevent the use of Google Analytics relating to your use of our Sites by downloading and installing a browser plugin available <a href="#">here</a> .  See 'your choices' below.
<i>Essential</i>	These cookies are necessary to allow the technical operation of our services (e.g., they enable you to move around on a website and to use its features).	<a href="#">Google Tag Manager</a>	See 'your choices' below.
<i>Functionality / performance</i>	Enhance the performance and functionality of our services.		See 'your choices' below.
<i>Social</i>	These cookies may allow you to log into the Sites or App through your social media account or share content in our sites that you find interesting through third-party social media providers. These cookies may also be used for advertising purposes.	<a href="#">Facebook Connect</a>	See 'your choices' below.

## Other technologies

In addition to cookies, our Sites may use other technologies, such as Flash technology to pixel tags to collect information automatically.

#### *Browser Web Storage*

We may use browser web storage (including via HTML5), also known as locally stored objects (“LSOs”), for similar purposes as cookies. Browser web storage enables the storage of a larger amount of data than cookies. Your web browser may provide functionality to clear your browser web storage.

#### *Flash Technology*

We may use Flash cookies (which are also known as Flash Local Shared Object (“Flash LSOs”)) on our Sites to collect and store information about your use of our Sites. Unlike other cookies, Flash cookies cannot be removed or rejected via your browser settings. If you do not want Flash LSOs stored on your computer or mobile device, you can adjust the settings of your Flash player to block Flash LSO storage using the tools contained in the Website Storage Settings Panel. You can also control Flash LSOs by going to the Global Storage Settings Panel and following the instructions. Please note that setting the Flash Player to restrict or limit acceptance of Flash LSOs may reduce or impede the functionality of some Flash applications, including, potentially, Flash applications used in connection with our Sites.

#### *Web Beacons*

We may also use web beacons (which are also known as pixel tags and clear GIFs) on our Sites and in our HTML formatted emails to track the actions of users on our Sites and interactions with our emails. Unlike cookies, which are stored on the hard drive of your computer or mobile device by a website, pixel tags are embedded invisibly on webpages or within HTML formatted emails. Pixel tags are used to demonstrate that a webpage was accessed or that certain content was viewed, typically to measure the success of our marketing campaigns or engagement with our emails and to compile statistics about usage of the Sites, so that we can manage our content more effectively.

#### *Mobile Application Software Development Kits (SDKs)*

We may use third-party software development kits (“SDKs”) in our mobile applications. A SDK is third-party computer code that may be used for a variety of purposes, including to provide us with analytics regarding the use of our mobile applications, to integrate with social media, add features or functionality to our app, or to facilitate online advertising. SDKs may enable third parties to collect information directly via our App.

### **Your choices**

Your options for controlling what information cookies and similar technologies collect about you include:

- **Blocking cookies in your browser.** Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. Please note that if you set your browser to disable cookies, the Sites may not work properly. For more information about cookies, including how to see what cookies have been set on your device and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org). If you do not accept our cookies, you may experience some

inconvenience in your use of our Sites. For example, we may not be able to recognize your computer or mobile device and you may need to log in every time you visit our Sites.

- **Third-party opt-out option.** You can opt-out of interest-based advertising through some of the third parties listed in the chart above by using the corresponding third-party opt-out tool provided in the chart.
- **Industry association opt-outs.** You may opt out of receiving interest-based advertising on websites through members of the Network Advertising Initiative or the Digital Advertising Alliance. You may opt out of receiving targeted advertising in mobile apps through participating members of the Digital Advertising Alliance by installing the AppChoices mobile app and selecting the user's choices. Please note that we also may work with companies that offer their own opt-out mechanisms and may not participate in the opt-out mechanisms linked above.
- **Blocking advertising ID use in your mobile settings.** Your mobile device settings may provide functionality to limit use of the advertising ID associated with your mobile device for interest-based advertising purposes.

For more information about cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org). If you do not accept our cookies, you may experience some inconvenience in your use of our Sites. For example, we may not be able to recognize your computer or mobile device and you may need to log in every time you visit our Sites.

If you choose to opt-out of targeted advertisements, you will still see advertisements online, but they may not be relevant to you. Even if you do choose to opt out, not all companies that serve online behavioral advertising are included in this list, and so you may still receive some cookies and tailored advertisements from companies that are not listed.

For more information about how we collect, use and share your information, see our Privacy Policy.

## Changes

Information about the cookies we use may be updated from time to time, so please check back on a regular basis for any changes.

## Questions

If you have any questions about this Cookie Notice, please contact us by email at [privacy@verituity.com](mailto:privacy@verituity.com).

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