



# Privacy Policy

This Privacy Policy statement is made by SensThys Inc. (collectively, "SensThys", "we", "us" or "our") and is effective as of 25th May 2018.

## SensThys' Privacy Commitment

The goal of this policy is to make explicit the information we gather on our customers and users, how we will use it, and how we will not. We will try and keep the language simple and direct as much as possible.

This policy tells you what information we do collect from you, what we do with it, who can access it, and what you can do about it.

We ask for only the least amount of information necessary, gathering only what we believe is essential for doing business, or for the specific transaction. We can let customers know the information we have on them and allow them to opt out of specific engagements.

Our privacy commitment: SensThys has never sold your information to someone else for advertising, or made money by showing you other people's ads, and we never will.

## Scope of this Privacy Policy

This Privacy Policy applies to SensThys' website that link to it. It also applies to the products and services provided by SensThys through our website, and SensThys online marketplace and in other third-party online marketplaces.

This Privacy Policy is divided into three parts:

### Part I – Information SensThys collects and controls

This part deals with how SensThys collects and uses information about website visitors, potential customers, users of SensThys products and services, and others who contact SensThys through forms or email addresses published on or linked to our websites.

### Part II – Information that SensThys processes on your behalf

This part deals with how SensThys handles data that you entrust to SensThys when you use our products and services, or when you share any personal or confidential information with us while requesting customer support.

### Part III – General

This part deals with topics that are relevant to both Parts I and II, and other general topics such as SensThys' security commitments and how we will inform you when we change this Privacy Policy.

# Part I – Information SensThys collects and controls

## What information SensThys collects

We collect information about you only if we need the information for some legitimate purpose. SensThys will have information about you only if (a) you have provided the information yourself, (b) SensThys has automatically collected the information, or (c) SensThys has obtained the information from a third party, such as a SensThys partner or reseller. Below we describe the various scenarios that fall under each of those three categories and the information collected in each one.

### Information that you provide us

- i. *Account signup:* When you sign up for an account to access one or more of our services, we ask for information such as your name, contact number, email address, company name and country to complete the account signup process. You are also required to choose a unique username and a password for accessing the created account.
- ii. *Event registrations and other form submissions:* We record information that you submit when you (i) register for any event, including webinars or seminars, (ii) subscribe to our newsletter or any other mailing list, (iii) submit a form in order to download any product, whitepaper, or other materials, (iv) participate in contests or respond to surveys, or (v) submit a form to request customer support or to contact SensThys for any other purpose.
- iii. *Payment processing:* When you buy something from us directly on our website marketplace, we ask you to provide your name, contact information, and credit card information or other payment account information. When you submit your card information, we do not store

- credit card information, such as account number, expiry date nor security code.
- iv. *Testimonials:* When you authorize us to post testimonials about our products and services on websites, we may include your name and other personal information in the testimonial. You will be given an opportunity to review and approve the testimonial before we post it. If you wish to update or delete your testimonial, you can contact us at [info@SensThys.com](mailto:info@SensThys.com)
  - v. *Interactions with SensThys:* We may record, analyze, and use your interactions with us, including email, telephone, and chat conversations with our sales and customer support professionals, for improving our interactions with you and other customers.

#### Information that we collect automatically

- i. *Information from browsers, devices and servers:* When you visit our websites, we collect information that web browsers, mobile devices and servers make available, such as the internet protocol address, browser type, language preference, time zone, referring URL, date and time of access, operating system, mobile device manufacturer and mobile network information. We include these in our log files to understand more about visitors to our websites.
- ii. *Information from application logs and mobile analytics:* We collect information about your use of our products and services from application logs and in-house usage analytics tools and use it to understand how your business use and needs can improve our products. This information could include clicks, scrolls, features accessed, access time and frequency, errors generated, performance

data, storage utilized, user settings and configurations, and devices used to access and their locations.

- iii. *Referrals:* If someone has referred any of our products to you through any of our referral programs, that person may have provided us your name, email address and other personal information. You may contact us at [info@SensThys.com](mailto:info@SensThys.com) to request that we remove your information from our database. If you provide us information about another person, or if another person gives us your information, we will only use that information for the specific reason for which it was provided to us.
- iv. *Information from our reselling partners and service providers:* If you contact any of our reselling partners, or otherwise express interest in any of our products to them, the reselling partner may pass your name, email address, company name and other information to SensThys. If you register for or attend an event that is sponsored by SensThys, the event organizer may share your information with us. SensThys may also receive information about you from review sites if you comment on any review of our products, and from other third-party service providers that we engage for marketing our products and services.
- v. *Information from social media sites and other publicly available sources:* When you interact or engage with us on social media sites, such as Facebook, Twitter, Google+ and Instagram through posts, comments, questions and other interactions, we may collect such publicly available information, including profile information, to allow us to connect with you, improve our products, or better understand user reactions and issues. We must tell you that once collected, this information may remain with us even if you delete it from the social media sites. SensThys may also add and update information about you, from other publicly available sources.

## Purposes for using information

In addition to the purposes mentioned above, we may use your information for the following purposes:

- To communicate with you (such as through email) about products that you have downloaded and services that you have signed up for, changes to this Privacy Policy, changes to the Terms of Service, or important notices;
- To keep you posted on new products and services, upcoming events, offers, promotions and other information that we think will be of interest to you;
- To ask you to participate in surveys, or to solicit feedback on our products and services;
- To provide customer support, and to analyze and improve our interactions with customers;
- To analyze trends, administer our websites, and track visitor navigations on our websites to understand what visitors are looking for, and to better help them;
- To monitor and improve marketing campaigns and make suggestions relevant to the user.

## Legal bases for collecting and using information

*Legal processing bases applicable to SensThys:* If you are an individual from the European Economic Area (EEA), our legal basis for information collection and use depends on the personal information concerned and the context in which we collect it. Most of our information collection and processing activities are typically based on (i) contractual necessity, (ii) one or more legitimate interests of SensThys or a third party that are not overridden by your data protection interests, or (iii) your consent. Sometimes, we may be legally required to collect your information, or may need your personal information to protect your vital interests or those of another person.

*Withdrawal of consent:* Where we rely on your consent as the legal basis, you have the right to withdraw your consent at any time, but this will not affect any processing that has already taken place.

*Legitimate interests notice:* Where we rely on legitimate interests as the legal basis and those legitimate interests are not specified above, we will clearly explain to you what those legitimate interests are at the time that we collect your information.

## Your choice in information use

*Opt out of non-essential electronic communications:* You may opt out of receiving newsletters and other non-essential messages by using the ‘unsubscribe’ function included in all such messages. However, you will continue to receive notices and essential transactional emails.

*Disable cookies:* You can disable browser cookies before visiting our website. However, if you do so, you may not be able to use certain features of the website properly.

*Optional information:* You can choose not to provide optional profile information, such as your photo. You can also delete or change your optional profile information. You can always choose not to fill in non-mandatory fields when you submit any form linked to our websites.

## Who we share your information with

We do not sell any personal information. We share your information only in the ways that are described in this Privacy Policy and only with parties who adopt appropriate confidentiality and security measures.

*Employees and independent contractors:* Employees and independent contractors of SensThys have access to the information covered in Part I on a need-to-know basis. We require all employees and independent contractors of SensThys to follow this Privacy Policy for personal information that we share with them.

*Third-party service providers:* We may need to share your personal information and aggregated or de-identified information with third-party service providers that we engage, such as marketing and advertising partners, event organizers, web analytics providers and payment processors. These service providers are authorized to use your personal information only as necessary to provide these services to us.

*Reselling partners:* We may share your personal information with our authorized reselling partners in your region, solely for the purpose of contacting you about products that you have expressed interest in or services that you have signed up for.

*Other cases:* Other scenarios in which we may share the same information covered under Parts I and II are described in Part III.

## Your rights with respect to information we hold about you as a controller

If you are in the European Economic Area (EEA), you have the following rights with respect to information that SensThys holds about you. SensThys undertakes to provide you the same rights no matter where you choose to live.



*Right to access:* You have the right to access (and obtain a copy of, if required) the categories of personal information that we hold about you, including the information's purpose.

*Right to rectification:* You have the right to update the information we hold about you or to rectify any inaccuracies. Based on the purpose for which we use your information, you can instruct us to add supplemental information about you in our database.

*Right to erasure:* You have the right to request that we delete your personal information in certain circumstances, such as when it is no longer necessary for the purpose for which it was originally collected.

*Right to restriction of processing:* You may also have the right to request to restrict the use of your information in certain circumstances, such as when you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

*Right to data portability:* You have the right to transfer your information to a third party in a structured, commonly used and machine-readable format, in circumstances where the information is processed with your consent or by automated means.

*Right to object:* You have the right to object to the use of your information in certain circumstances, such as the use of your personal information for direct marketing.

*Right to complain:* You have the right to complain to the appropriate supervisory authority if you have any grievance against the way we collect, use or share your

information. This right may not be available to you if there is no supervisory authority dealing with data protection in your country.

## Retention of information

We retain your personal information for as long as it is required for the purposes stated in this Privacy Policy. Sometimes, we may retain your information for longer periods as permitted or required by law, such as to maintain suppression lists, prevent abuse, if required in connection with a legal claim or proceeding, to enforce our agreements, for tax, accounting, or to comply with other legal obligations. When we no longer have a legitimate need to process your information, we will delete or anonymize your information from our active databases. We will also securely store the information and isolate it from further processing on backup discs until deletion is possible.

## Part II – Information that SensThys processes on your behalf

### Information entrusted to SensThys and purpose

*Information provided in connection with services:* You may entrust information that you or your organization (“you”) control, to SensThys in connection with use of our products or for requesting technical support for our products. This includes information regarding your customers and your employees (if you are a controller) or data that you hold and use on behalf of another person for a specific purpose, such as a customer to whom you provide services (if you are a processor). The data may either be stored on our servers when you use our services or transferred or shared to us as part of a request for technical support or other services.

## Who we share service data with

*Employees and independent contractors:*\*+ We may provide access to your data to our employees and individuals who are independent contractors of SensThys involved in providing the services (collectively our “employees”) so that they can identify, analyze and resolve product support issues. We communicate our privacy and security guidelines to our employees and strictly enforce privacy safeguards within SensThys.

*Other cases:* Other scenarios in which we may share information that are common to information covered under Parts I and II are described in Part III.

## Retention of information

We hold the data in your account as long as you choose to use SensThys Products.

## Data subject requests

If you are from the European Economic Area and you believe that we store, use or process your information on behalf of one of our customers, please contact the customer if you would like to access, rectify, erase, restrict or object to processing, or export your personal data. We will extend our support to our customer in responding to your request within a reasonable timeframe.

## Part III – General

### Children’s personal information

Our products and services are not directed to individuals under 16. SensThys does not knowingly collect personal information from children who are under 16 years of age. If we become aware that a child under 16 has provided us with personal information, we will take steps to delete such information. If you

believe that a child under 16 years has provided personal information to us, please write to [info@SensThys.com](mailto:info@SensThys.com) with the details, and we will take the necessary steps to delete the information we hold about that child.

## Security of your information

At SensThys, we take data security very seriously. We have taken steps to implement appropriate administrative, technical and physical safeguards to prevent unauthorized access, use, modification, disclosure or destruction of the information you entrust to us. If you have any concerns regarding the security of your data, we encourage you to write to us [info@SensThys.com](mailto:info@SensThys.com) with any questions.

## Data Protection Officer

We have appointed a Data Protection Officer to oversee our management of your personal information in accordance with this Privacy Policy. If you have any questions or concerns about our privacy practices with respect to your personal information, you can reach out to our Data Protection Officer by sending an email to [info@SensThys.com](mailto:info@SensThys.com) or by writing to: Data Protection Officer, SensThys Inc, 21060 Homestead Rd, STE 226, Cupertino, CA 95014.

## Locations and international transfers

We share your personal information data within SensThys. By accessing or using our products or otherwise providing personal information to us, you consent to the processing, transfer, and storage of your personal information within the United States of America, and other countries where may SensThys operate.

## Data processing addendum

To enable you to be compliant with the data protection obligations under the General Data Protection Regulation, we are prepared to sign a Data Processing Addendum (DPA) that is based on Standard Contractual Clauses. You can request a DPA from SensThys by contacting us at [info@senssthy.com](mailto:info@senssthy.com). Once we get your request, we'll forward the DPA to you for your signature.

## Do Not Track (DNT) requests

Some internet browsers have enabled 'Do Not Track' (DNT) features, which send out a signal (called the DNT signal) to the websites that you visit indicating that you don't wish to be tracked. Currently, there is no standard that governs what websites can or should do when they receive these signals. For now, we do not take action in response to these signals.

## External links on our websites

Some pages of our websites may contain links to websites that are not linked to this Privacy Policy. If you submit your personal information to any of these third-party sites, your personal information is governed by their privacy policies. As a safety measure, we recommend that you not share any personal information with these third parties unless you've checked their privacy policies and assured yourself of their privacy practices.

## Blogs and forums

We may offer publicly accessible blogs and forums on our websites. Please be aware that any information you provide on these blogs and forums may be used to contact you with unsolicited messages. We urge you to be cautious in disclosing personal information in our blogs and forums. SensThys is not responsible for the personal information you elect to disclose publicly. Your posts and certain profile information may remain even after you terminate your

account with SensThys. To request the removal of your information from our blogs and forums, you can contact us at [info@SensThys.com](mailto:info@SensThys.com)

## Social media widgets

Our websites may include social media widgets such as Facebook "like" buttons and Twitter "tweet" buttons that let you share articles and other information. These widgets may collect information such as your IP address and the pages you navigate in the website and may set a cookie to enable the widgets to function properly. Your interactions with these widgets are governed by the privacy policies of the companies providing them.

## Disclosures in compliance with legal obligations

We may be required by law to preserve or disclose your personal information and service data to comply with any applicable law, regulation, legal process or governmental request, including to meet national security requirements.

## Enforcement of our rights

We may disclose personal information and service data to a third party if we believe that such disclosure is necessary for preventing fraud, investigating any suspected illegal activity, enforcing our agreements or policies, or protecting the safety of our users.

## Business Transfers

We do not intend to sell our business. However, in the unlikely event that we sell our business or get acquired or merged, we will ensure that the acquiring entity is legally bound to honor our commitments to you. We will notify you via email or through a prominent notice on our website of any change in ownership or in

the uses of your personal information and service data. We will also notify you about any choices you may have regarding your personal information and service data.

## Compliance with this Privacy Policy

We make every effort, including periodic reviews, to ensure that personal information you provide is used in conformity with this Privacy Policy. If you have any concerns about our adherence to this Privacy Policy or the manner in which your personal information is used, kindly write to us [info@SensThys.com](mailto:info@SensThys.com). We will contact you, and if required, coordinate with the appropriate regulatory authorities to effectively address your concerns.

## Notification of changes

We may modify the Privacy Policy at any time. We will notify you through a service announcement or by sending an email to your primary email address. If we make significant changes to the Privacy Policy that affect your rights, you will be provided with at least 30 days' advance notice of the changes by email to your primary email address. If you think that the updated Privacy Policy affects your rights with respect to your use of our products or services, you may terminate your use by sending us an email within 30 days. Your continued use after the effective date of changes to the Privacy Policy will be deemed to be your agreement to the modified Privacy Policy. You will not receive email notification of minor changes to the Privacy Policy. If you are concerned about how your personal information is used, you should check back at <https://www.sensthys.com/policies> periodically.