



## **Transmit Security Privacy Statement**

### **This Privacy Statement is effective as of August 18, 2020**

At Transmit Security, we recognize the importance of protecting your personal information and are committed to processing it responsibly and in compliance with applicable data protection laws in all countries in which Transmit Security operates.

This Privacy Statement describes Transmit Security's general privacy practices that apply to personal information we collect, use and share about consumers and other individuals within our clients, business partners, suppliers, and other organizations with which Transmit Security has or contemplates a business relationship.

#### **1. Why and how we collect and use your personal information**

We may collect your personal information as an individual for various purposes, such as the following:

- **Access and use of websites or other online service**  
When entering one of our websites, or using an online service, we will record information necessary to provide you with access, for the operation of the website and for us to comply with security and legal requirements in relation to operating our site, such as passwords, IP address and browser settings. We also collect information about your activities during your visit in order to personalize your website experience, such as recording your preferences and settings, and to collect statistics to help us improve and further develop our websites, products and services.
- **Responding to your request for information, order, or support**  
When you contact us (online or offline) in connection with a request for information, to order a product or service, to provide you with support, or to participate in a forum or other social computing tool, we collect information necessary to fulfill your request, to grant you access to the product or service, to provide you with support and to be able to contact you. For instance, we collect your name and contact information, details about your request and your agreement with us and the fulfillment, delivery and invoicing of your order and we may include client satisfaction survey information. We retain such information for administrative purposes, defending our rights, and in connection with our relationship with you.

When you provide your name and contact information to register in connection with such a request, the registration may serve to identify you when you visit our websites. Registration may also allow you to customize and control your privacy settings.

- **Your use of Transmit Security Cloud Services**  
We collect information about your use of Transmit Security Cloud Services to enable product features to operate, improve your user experience, tailor our interactions with you, inform our clients on the overall use of the services, provide support and improve and develop our products and services.
- **Contacting employees of our clients, prospects, partners and suppliers**  
In our relationship with clients or prospects, partners and suppliers, they also provide us with business contact information (such as name, business contact details, position or title of their employees, contractors, advisors and authorized users) for purposes such as contract management, fulfillment, delivery of products and services, provision of support, invoicing and management of the services or the relationship.
- **Marketing**  
Most information we collect about you comes from our direct interactions with you. When you register for an event we may collect information (online or offline) in relation to the event organization, and during an event, such as participation in sessions and survey results. We



combine the personal information we collect to develop aggregate analysis and business intelligence for conducting our business and for marketing purposes. You can choose to receive information by email, telephone or postal mail about our products and services, or sign-up for subscriptions. When visiting our websites or using our services we may provide you with personalized information. You can always opt-out from receiving personalized communication by following the opt-out instructions in the marketing email.

Where we reference that we use your personal information in connection with a request, order, transaction or agreement (or preparing for the same), or to provide you with services that you requested (such as a website), we do this because it is necessary for the performance of an agreement with you.

Where we reference that we use your personal information in relation to marketing, improvement or development of our products or services, for reasons of safety and security, or regulatory requirements other than in connection with your agreement or request, we do this on the basis of our or a third party's legitimate interests, or with your consent.

- Children

Our websites, products and services are not intended for use by children under the age of 16.

## **2. Sharing of personal information**

As a global organization offering a wide range of products and services, with business processes, management structures and technical systems that cross borders, Transmit Security has implemented global policies, along with standards and procedures, for consistent protection of personal information. As a global company, we may share information about you with our subsidiaries world-wide and transfer it to countries in the world where we do business in accordance with this Privacy Statement.

Between Transmit Security controlled subsidiaries we only grant access to personal information on a need-to-know basis, necessary for the purposes for which such access is granted. In some cases, Transmit Security uses suppliers located in various countries to collect, use, analyze, and otherwise process personal information on its behalf. With our suppliers, we implement reasonable contractual and technical protections to limit their use of that information to help us provide the service they are providing to us. We also require that our suppliers protect such information from unauthorized access, use and disclosure.

Where appropriate, Transmit Security may also share your personal information with selected partners to help us provide you, or the company you work for, products or services, or to fulfill your requests, or with your consent. When selecting our suppliers and partners, we take into account their data handling processes.

If Transmit Security decides to sell, buy, merge or otherwise reorganize businesses in some countries, such a transaction may involve the disclosure of personal information to prospective or actual purchasers, or the receipt of such information from sellers. It is Transmit Security's practice to require appropriate protection for personal information in these types of transactions.

Please be aware that in certain circumstances, personal information may be subject to disclosure to government agencies pursuant to judicial proceeding, court order, or legal process. We may also share your personal information to protect the rights or property of Transmit Security, our business partners, suppliers or clients, and others when we have reasonable grounds to believe that such rights or property have been or could be affected.

### **Data Transfers**



Your information may be processed on servers located outside of the country where you live. Data protection laws vary among countries, with some providing more protection than others. Regardless of where your information is processed, we apply the same protections described in this policy.

When we receive formal written complaints, we respond by contacting the person who made the complaint. We work with the appropriate regulatory authorities, including local data protection authorities to resolve any complaints regarding the transfer of your data we cannot resolve with you directly.

### **3. Information Security**

#### **Your personal information**

Transmit Security implements reasonable physical, administrative and technical safeguards to help us protect your personal information from unauthorized access, use and disclosure. For example, Each customer's database is encrypted with a different encryption key to prevent any data leaks and to prevent Transmit staff from accessing customers' data. Transmit manages the keys securely in a protected key store . We protect your data with firewalls and networking tools such as Anti-DDoS. Any type of access to your data is audited.

Furthermore, because certain areas on our Services are less secure than others (for example, if you set your Support forum ticket to be "Public" instead of "Private", or if you browse to a non-SSL page), and since e-mail and instant messaging are not recognized as secure forms of communications, we request and encourage you not to share any personal information on any of these areas or via any of these methods.

If you have any questions regarding the security of our Services, you are welcome to contact us at [privacy@transmitsecurity.com](mailto:privacy@transmitsecurity.com).

#### **Clients-Users' personal information**

Transmit Security may collect, store and process certain personal information of our clients' users ("Clients-Users"), solely on client's behalf and at their direction.

For such purposes, Transmit Security serves and shall be considered as a "Processor" and not as the "Controller" (as both such capitalized terms are defined in the European Union General Data Protection Regulation ("GDPR")) of such Clients-Users personal information.

You are responsible for the security, integrity and authorized usage of personal information about Clients-Users, and for obtaining consents, permissions and providing any required data subject rights and fair processing notices required for the collection and usage of such personal information.

Transmit Security cannot provide legal advice to our clients or their users, however we do recommend that our clients publish and maintain clear and comprehensive privacy policies on their websites in accordance with any applicable laws and regulations, and that all Clients-Users carefully read those policies and make sure that they understand and, to the extent required by applicable law, consent to them.



For more information on how Clients-Users personal information may be handled by Transmit Security (which may be relevant for any specific notice you provide to and/or consent you obtain from your user), please see sections: Sharing of personal information, Data Retention Period, and Security.

**If you are a visitor, user or customer of any of our clients, please read the following:** Transmit Security has no direct relationship with Clients-Users whose personal information it processes. If you are a visitor, user or customer of any of our clients, and would like to make any requests or queries regarding your personal information, please contact such client(s) directly. For example, if you wish to request to access, correct, amend, or delete inaccurate personal information processed by Transmit Security on behalf of its Users, please direct your query to the relevant client (who is the “Controller” of such data). If Transmit Security is requested by our client to remove any Clients-Users personal information, we will respond to such requests in a timely manner upon verification and in accordance with applicable law (for example, thirty (30) days under the GDPR). Unless otherwise instructed by our client, we will retain their Clients-Users personal information for the period set forth in Data Retention Period section.

Regardless of the measures and efforts taken by Transmit Security, we cannot and do not guarantee the absolute protection and security of your personal information, your Client-Users’ personal information or any other information you upload, publish or otherwise share with Transmit Security or anyone else. We encourage you to set strong passwords for your client account and website, and avoid providing us or anyone with any sensitive personal information of which you believe its disclosure could cause you substantial or irreparable harm.

#### **4. Data Retention Period**

We will not retain personal information longer than necessary to fulfill the purposes for which it is processed, including the security of our processing complying with legal and regulatory obligations (e.g. audit, accounting and statutory retention terms), handling disputes, and for the establishment, exercise or defense of legal claims in the countries where we do business.

In relation to Transmit Security Cloud Services which you are authorized to use by the Transmit Security client contracting for that service with Transmit Security, your registration information may be retained to fulfill certain requirements of that Transmit Security client.

#### **5. Cookies, Web Beacon and Other Technologies**

As mentioned above, we collect information from your visits to our websites and your use of our Transmit Security services and our software products to help us gather statistics about usage and effectiveness, personalize your experience, tailor our interactions with you, and improve our products and services. We do so through the use of various technologies, including scripts, tags, Local Shared Objects (Flash cookies), Local Storage (HTML5) beacons, and “cookies”.

#### **What are cookies and why are cookies used**

A cookie is a piece of data that a website can send to your browser, which may then be stored on your computer as a tag that identifies your computer. While cookies are often only used to measure website usage (such as number of visitors and duration of visit) and effectiveness (such as topics visitors are most interested in) and to allow for ease of navigation or use and, as such, are not associated with any personal information, they are also used at times to personalize a known visitor's experience of a website by being associated with profile information or user preferences. Over time this information provides valuable insight to help improve the user experience.

Cookies are typically categorized as “session” cookies or “persistent” cookies. Session cookies help you navigate through the website efficiently, keeping track of your progression from page to page so that you are not asked for information you have already provided during the current visit, or information needed to be able to complete a transaction. Session cookies are stored in temporary memory and erased when the web browser is closed. Persistent cookies on the other hand, store user preferences for current and

successive visits. They are written on your device's hard disk, and are still valid when you restart your browser. We use persistent cookies, for example, to record your choice of language and country location.

### **How to express privacy preferences regarding the use of cookies**

When visiting our websites or online services, you may have the possibility to set your preferences regarding cookies and other similar technologies by using the options and tools made available to you by either your web browser or Transmit Security. If a cookie manager has been implemented by Transmit Security, it will be displayed at your first visit to our website. By clicking 'cookie preferences' at the footer of an Transmit Security website you can choose and change at any time which types of cookies you would like our websites and Transmit Security services to use. You can indicate your preference for required, required and functional or required, functional and personalization cookies. Here you can also find more information on the types of cookies used. Using the cookie preferences does not result in deletion of cookies that are already on your device. You can delete cookies already on your device via the settings of your web browser.

While Transmit Security websites, online and services at this time do not recognize automated browser signals regarding tracking mechanisms, such as "do not track" instructions, you can generally express your privacy preferences regarding the use of most cookies and similar technologies through your web browser. Look under the heading "Tools" (or similar heading) in your particular browser for information about controlling cookies. In most instances you can set your browser to notify you before you receive a cookie, giving you the option to decide whether to accept it or not. You can also generally set your browser to turn off cookies. Cookies in our software products can be turned off in the product itself. Since cookies allow you to take advantage of some of our websites' features or features of our software products and Transmit Security services, we recommend that you leave them turned on. If you block, turn off or otherwise reject our cookies, some web pages may not display properly or you will not be able to, for instance, add items to your shopping cart, proceed to checkout, or use any website or Transmit Security services that require you to sign in.

### **Web beacons or other technologies**

Some Transmit Security websites, Transmit Security services and software products may also use web beacons or other technologies to better tailor those sites to provide better customer service. These technologies may be in use on a number of pages across Transmit Security's websites. When a visitor accesses these pages, a non-identifiable notice of that visit is generated which may be processed by us or by our suppliers. These web beacons usually work in conjunction with cookies. If you don't want your cookie information to be associated with your visits to these pages or use of these products, you can set your browser to turn off cookies or turn off cookies in the product itself, respectively. If you turn off cookies, web beacon and other technologies will still detect visits to these pages; however, they will not be associated with information otherwise stored in cookies.

For more information about the technologies employed by our Transmit Security services and software products, including how to turn them off, please consult the user guide for the particular software product or Transmit Security services you are using.

We use Local Shared Objects, such as Flash cookies, and Local Storage, such as HTML5, to store content information and preferences. Third parties with whom we partner to provide certain features on our website or to display Transmit Security advertising on others' websites based upon your web browsing activity also use Flash cookies or HTML5 to collect and store information. Various browsers may offer their own management tools for removing HTML5. To manage Flash cookies, please [click here](#).

We may also include web beacons in marketing e-mail messages or our newsletters in order to determine whether messages have been opened and links contained within clicked on.

Some of our business partners set web beacons and cookies on our site. In addition, third-party social media buttons may log certain information such as your IP address, browser type and language, access time, and referring website addresses, and, if you are logged in to those social media sites, they may also



link such collected information with your profile information on that site. We do not control these third party tracking technologies. Note that the "s81c.com" domain used to deliver static content on some of our web sites, is managed by Transmit Security, and not by a third party.

#### **6. How to contact us**

If you have a question related to this Privacy Statement, please email us at [privacy@transmitsecurity.com](mailto:privacy@transmitsecurity.com). Your message will be forwarded to the appropriate member within Transmit Security.

#### **7. Your Rights**

You can request to access, update, delete, or correct your personal information. You also have the right to object to direct marketing. To make a request, please email us at [privacy@transmitsecurity.com](mailto:privacy@transmitsecurity.com).

You may have additional rights pursuant to your local law applicable to the processing. For example, if the processing of your personal information is subject to the EU General Data Protection Regulation ("GDPR"), and your personal information is processed based on legitimate interests, you have the right to object to the processing on grounds relating to your specific situation. Under GDPR you may also have the right to request to have your personal information deleted or restricted and ask for portability of your personal information.

#### **Right to Lodge a Complaint**

In the event you consider our processing of your personal information not to be compliant with the applicable data protection laws, you can lodge a complaint:

- Directly with Transmit Security by emailing us at [privacy@transmitsecurity.com](mailto:privacy@transmitsecurity.com).
- With the competent data protection authority (e.g. Data Protection Authorities in the European Union)

#### **8. Changes to our Privacy Statements**

We regularly review this Privacy Statement from time to time to reflect changes to our data governance practices. The revised Privacy Statement will be posted on our site with an updated revision date. We encourage you to check back periodically for any changes or updates. If we make a material change to our Privacy Statement, we will post a notice at the top of this page for 30 days. By continuing to use our websites after such revision takes effect we consider that you have read and understand the changes.