

# Privacy policy

In this policy, we lay out: what data we collect and why; how your data is handled; and your rights to your data. By accessing nZero's website and using its services, you acknowledge that you have read and understand this Privacy Policy. If you have questions about this policy, please email [legal@nzero.com](mailto:legal@nzero.com).

## What we collect and why

Our guiding principle is to collect only what we need. Here's what that means in practice:

### Identity & access

We may ask for identifying information such as your name, email address, and company name. This is for account login credentials, account personalization and the ability to contact you about your account (e.g. reset account password).

### Geolocation data

We log all access to all accounts by full IP address so that we can always verify no unauthorized access has happened. We keep this login data for as long as your product account is active.

Web analytics data — described further in the Website Interactions section — are also tied temporarily to IP addresses to assist with troubleshooting cases. We blind all web analytics data after a period of 1 year.

### Product interactions

When you use the nZero application through your web browser, your browser automatically shares certain information such as which operating system and browser version you are using. We track that information, along with the pages you are visiting, page load timing, and which website referred you for statistical purposes like conversion rates and to test new designs. We sometimes track specific link clicks to help inform some design decisions. These web analytics data are tied to your IP address and user

account if applicable and you are signed into our Services. We blind all of these individual identifiers after a period of 1 year.

## **Cookies and Do Not Track**

We do use persistent first-party cookies to store certain preferences, make it easier for you to use our applications, and support some in-house analytics. A cookie is a piece of text stored by your browser to help it remember your login information, site preferences, and more. You can adjust cookie retention settings in your own browser. To learn more about cookies, including how to view which cookies have been set and how to manage and delete them, please visit: [www.allaboutcookies.org](http://www.allaboutcookies.org).

At this time, our sites and applications do not respond to Do Not Track beacons sent by browser plugins.

## **Information we do not collect**

We don't collect any characteristics of protected classifications including age, race, gender, religion, sexual orientation, gender identity, gender expression, or physical and mental abilities or disabilities. We also do not collect any biometric data.

## **Retention Policy**

nZero retains personal data for as long as necessary to provide the products and services you have requested, or for other legitimate purposes such as complying with our legal obligations, resolving disputes, and enforcing our agreements. Because these needs can vary for different data types, the context of our interactions with you or your use of products, actual retention periods can vary significantly.

## **Collection of data from children**

Due to their nature, nZero products and services will not be used to monitor activity, physical location, or use by children. If you believe we have collected information from your child in error or have questions or concerns about our practices relating to children, please contact us as described above. nZero urges parents to instruct their children never to give out their real names, addresses, or phone numbers, without parental permission. If you learn that your child has provided us with personally identifiable information without your consent, you may alert us by contacting us as described above. If we learn that we have collected any personally identifiable information from

children under 13 (and in certain jurisdictions under the age of 16), we will promptly take steps to delete such information and terminate the child's account.

## When we access or share your information

Our default practice is to not access your information. The only times we'll ever access or share your info are:

To provide products or services you've requested.

To help you troubleshoot or squash a software bug, with your permission. If at any point we need to access your account to help you with a Support case, we will ask for your consent before proceeding.

To investigate, prevent, or take action regarding restricted uses. Accessing a customer's account when investigating potential abuse is a measure of last resort. We have an obligation to protect the privacy and safety of both our customers and the people reporting issues to us. We do our best to balance those responsibilities throughout the process. If we do discover you are using our products for a restricted purpose, we will report the incident to the appropriate authorities.

When required under applicable law.

nZero is a US company and all data infrastructure are located in the US.

- If US law enforcement authorities have the necessary warrant, criminal subpoena, or court order requiring we share data, we have to comply. Otherwise, we flat-out reject requests from local and federal law enforcement when they seek data. And unless we're legally prevented from it, we'll always inform you when such requests are made. In the event a government authority outside the US approaches nZero with a request, our default stance is to refuse unless the US government compels us to comply through procedures outlined in a mutual legal assistance treaty or agreement. *We have never received a National Security Letter or Foreign Intelligence Surveillance Act (FISA) order.*
- Similarly, if nZero receives a request to preserve data, we refuse unless compelled by either the US Federal Stored Communications Act, 18 U.S.C. Section 2703(f) or a properly served US subpoena for civil matters. In both of these situations, we have to comply. In these situations, we notify affected customers as soon as possible unless we are legally prohibited from doing so. We do not share preserved data unless absolutely required under the Stored Communications Act or compelled by a court order that we cannot or choose not to appeal. Furthermore, unless we receive a

proper warrant, court order, or subpoena before the required preservation period expires, we destroy any preserved copies we made of customer data once the preservation period lapses.

- If we are audited by a tax authority, we may be required to share billing-related information. If that happens, we only share the bare minimum needed such as billing addresses and tax exemption information.

## Your rights with respect to your information

At nZero, we apply data rights based on the jurisdictional requirements of the customer's location. Currently some of the most privacy-forward regulations in place are the European Union's General Data Protection Regulation ("GDPR") and California Consumer Privacy Act ("CCPA") in the US. For applicable customers, nZero recognizes all of the rights granted in these regulations, except as limited by applicable law. These rights include:

- **Right to Know.** You have the right to know what personal information is collected, used, shared or sold. We outline both the categories and specific bits of data we collect, as well as how they are used, in this privacy policy.
- **Right of Access.** This includes your right to access the personal information we gather about you, and your right to obtain information about the sharing, storage, security and processing of that information.
- **Right to Correction.** You have the right to request correction of your personal information.
- **Right to Erasure / "To be Forgotten".** This is your right to request, subject to certain limitations under applicable law, that your personal information be erased from our possession and, by extension, all of our service providers. Fulfillment of some data deletion requests may prevent you from using nZero services because our applications may then no longer work.
- **Right to Complain.** You have the right to make a complaint regarding our handling of your personal information with the appropriate supervisory authority. To identify your specific authority or find out more about this right, EU individuals should go to [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).
- **Right to Restrict Processing.** This is your right to request restriction of how and why your personal information is used or processed, including opting out of sale of personal information.
- **Right to Object.** You have the right, in certain situations, to object to how or why your personal information is processed.
- **Right to Portability.** You have the right to receive the personal information we have about you and the right to transmit it to another party.

- Right to not be subject to Automated Decision-Making. You have the right to object and prevent any decision that could have a legal, or similarly significant, effect on you from being made solely based on automated processes. This right is limited, however, if the decision is necessary for performance of any contract between you and us, is allowed by applicable law, or is based on your explicit consent.
- Right to Non-Discrimination. This right stems from the CCPA. We do not and will not charge you a different amount to use our products, offer you different discounts, or give you a lower level of customer service because you have exercised your data privacy rights. However, the exercise of certain rights (such as the right “to be forgotten”) may, by virtue of your exercising those rights, prevent you from using our Services.

## **How we secure your data**

All data is encrypted via SSL/TLS when transmitted from our servers to your browser. The database information is encrypted at rest; backups are also encrypted.

## **Location of site and data**

Our products and other web properties are operated in the United States. If you are located in the European Union or elsewhere outside of the United States, please be aware that any information you provide to us will be transferred to and stored in the United States. By using our Site, participating in any of our services and/or providing us with your information, you consent to this transfer.

## **Other Third-Party Websites**

To make our website more valuable to our visitors, we may offer some features or advertisements in conjunction with other providers. Our website may also include links to other third-party websites whose privacy policies we do not control. Once you leave our website, use of any information you provide is governed by the privacy policy of the operator of the website you are visiting, which may differ from this Policy. You should contact these third-party websites directly if you have any questions about their use of the information that they collect.