

GDPR PRIVACY NOTICE

Last updated May 1, 2018

INTRODUCTION

Thank you for choosing to be part of our community at Netshield Corporation (“company”, “we”, “us”, or “our”). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us at [contact email].

When you visit our website www.netshieldcorp.com (“Site”) and use our services, you trust us with your personal information. We take your privacy very seriously. In this privacy notice, we describe our privacy policy. We seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy policy that you do not agree with, please discontinue use of our site and our services.

This privacy policy applies to all information collected through our products, website, partner portal, and/or any related services, sales, marketing or events (we refer to them collectively in this privacy policy as the “Sites”).

Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.

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WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

***In Short:** We collect personal information that you provide to us such as name, address, contact information, passwords and security data, payment information, and social media login data.*

We collect personal information from you and all end users voluntarily provided to us when using Netshield software, expressing an interest in obtaining information about us or our products and services, when participating in activities on the Sites, or otherwise contacting us.

The personal information that we collect depends on the context of your interactions with our products and the Sites, the choices you make and the products and features you use. The personal information we COLLECT can include the following:

Name and Contact Data. We may, in the course of providing Netshield services or marketing activity have access to full names, email address, postal address, phone number, and other similar contact data.

Credentials. We may, in the course of providing Netshield services or marketing activity, collect passwords, password hints, and similar security information used for authentication and account access.



Payment Data. We may, in the course of providing Netshield services or marketing activity, collect data necessary to process payment including payment instrument number (such as a credit card number), and the security code associated with a payment instrument. All payment specific data captured for that purpose is stored by our payment processor and you should review its privacy policies and contact the payment processor directly to respond to your questions.

Information automatically collected: The Netshield product monitors network activity and has access to a wide variety of information, including the above and network specific information such as IP address and/or browser and device characteristics, operating system, language preferences, URSSs, device names, country, location, and other technical information. These data are required to be accessed by Netshield automatically in the natural course of providing our services.

HOW DO WE USE YOUR INFORMATION?

We process your information in the natural course of providing Netshield services, and exclusively for these legitimate business purposes and the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.

We use personal information collected via our Sites for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests ("Business Purposes"), in order to enter into or perform a contract with you ("Contractual"), with your consent ("Consent"), and/or for compliance with our legal obligations ("Legal Reasons"). We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- **To facilitate account creation and logon process** [with your Consent]. If you choose to link your account with us to a third party account we use the information you allowed us to collect from those third parties to facilitate account creation and logon process.
- **To send you marketing and promotional communications** [for Business Purposes and/or with your Consent]. We and/or our third party marketing partners may use the personal information you send

to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt-out of our marketing emails at any time (see the "Your Privacy Rights" below).

- **To send administrative information to you** [for Business Purposes, Legal Reasons and/or possibly Contractual]. We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.
- **Fulfill and manage your orders** [for Contractual reasons]. We may use your information to fulfill and manage your orders, payments, returns, and exchanges made through the Sites.
- **To post testimonials** [with your Consent]. We post testimonials on our Sites that may contain personal information. Prior to posting a testimonial, we will obtain your consent to use your name and testimonial. If you wish to update, or delete your testimonial, please contact us at www.netshieldcorp.com and be sure to include your name, testimonial location, and contact information.
- **Request Feedback** [for our Business Purposes and/or with your Consent]. We may use your information to request feedback and to contact you about your use of our Sites.
- **To protect our Sites** [for Business Purposes and/or Legal Reasons]. We may use your information as part of our efforts to keep our Sites safe and secure (for example, for fraud monitoring and prevention).
- **To enable user-to-user communications** [with your consent]. We may use your information in order to enable user-to-user communications with each user's consent.
- **To enforce our terms, conditions and policies** [for Business Purposes, Legal Reasons and/or possibly Contractual].
- **To respond to legal requests and prevent harm** [for Legal Reasons]. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.

- **For other Business Purposes.** We may use your information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Sites, products, services, marketing and your experience.

WILL YOUR INFORMATION BE SHARED WITH ANYONE?

We never share information with your consent and a legitimate business purpose, and we comply with all applicable laws, including GDPR, to protect your rights, or to fulfill business obligations.

We only share and disclose your information in the following situations:

- **Compliance with Laws.** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests and Legal Rights.** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.
- **Vendors, Consultants and Other Third-Party Service Providers.** We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: product specific third party data and information sources, payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. Unless described in this Policy, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.
- **With your Consent.** We may disclose your personal information for any other purpose only with your expressly granted consent.
- **Other Users.** When you share personal information (for example, by posting comments, contributions or other content to the Sites) or otherwise interact with public areas of the Site [or App], such personal information may be viewed by all users and may be publicly distributed outside the Site [and our App] in perpetuity. [If you interact with other users of our Sites and register through a social network (such as Facebook), your contacts on the social network will see your name, profile photo, and descriptions of your activity.] Similarly, other users will be able to view descriptions of your activity, communicate with you within our Sites, and view your profile.

DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

We may use cookies and other tracking technologies to collect and store your information.

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Policy.

HOW DO WE HANDLE YOUR SOCIAL LOGINS?

If you choose to register or log in to our websites using a social media account, we may have access to certain information about you.



Our Sites sometimes offer you the ability to register and login using your third party social media account details (like your Facebook or Twitter logins). Where you choose to do this, we will receive certain profile information about you from your social media provider. The profile Information we receive may vary depending on the social media provider concerned, but will often include your name, e-mail address, friends list, profile picture as well as other information you choose to make public. [If you login using Facebook, we may also request access to other permissions related to your account, such as friends, check-ins, and likes, and you may choose to grant or deny us access to each individual permission.]

We will use the information we receive only for the purposes that are described in this privacy policy or that are otherwise made clear to you on the Sites. Please note that we do not control, and are not responsible for, other uses of your personal information by your third party social media provider. We recommend that you review their privacy policy to understand how they collect, use and share your personal information, and how you can set your privacy preferences on their sites and apps.

IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?

***In Short:** We may transfer, store, and process your information in countries other than your own.*

Netshield is a global company based in New Hampshire, USA. Our devices and software are deployed in a variety of countries and, for the express purpose of supporting our products and services, we have access to data processed. If you are accessing our Sites from outside the United States, please be aware that your information may be transferred to, stored, and processed by us in our facilities and by those third parties with whom we may share your personal information (see "Disclosure of Your Information" above), in the United States and other countries .

If you are a resident in the European Economic Area, then these countries may not have data protection or other laws as comprehensive as those in your country. We will however take all necessary measures to protect your personal information in accordance with this privacy policy and applicable law, regardless of the country in which your data may be accessed.

European Commission's Standard Contractual Clauses: Such measures implementing the European Commission's Standard Contractual Clauses for transfers of personal information between our group



companies and between us and our third-party providers, which require all such recipients to protect personal information that they process from the EEA in accordance with European data protection laws. Our Standard Contractual Clauses can be provided upon request. We have implemented similar appropriate safeguards with our third party service providers and partners and further details can be provided upon request.

HOW LONG DO WE KEEP YOUR INFORMATION?

We keep your information for as long as necessary to fulfill the purposes outlined in this privacy policy unless otherwise required by law.

We will only keep data for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements).

When we have no ongoing legitimate business need to process your personal information, 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.

HOW DO WE KEEP YOUR INFORMATION SAFE?

We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Sites is at your own risk. You should only access the services within a secure environment.

DO WE COLLECT INFORMATION FROM MINORS?

In Short: We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly solicit data from or market to children under 18 years of age. By using the Sites, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Site. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under age 18, please contact us at security@netshieldcorp.com.

WHAT ARE YOUR PRIVACY RIGHTS?

In some regions, such as the European Economic Area, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.

In some regions (like the European Economic Area), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please use the contact details provided below security@netshieldcorp.com. We will consider and act upon any request in accordance with applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal.

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory

authority. You can find their contact details here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm]

Account Information

You may at any time review or change the information in your account or terminate your account by:

- Logging into your account settings and updating your account
- Contacting us using the contact information provided below

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with legal requirements.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Sites.

Opting out of email marketing: You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list – however, we will still need to send you service-related emails that are necessary for the administration and use of your account. You can also opt-out by:

- Noting your preferences at the time you register your account with the Sites.
- Logging into your account settings and updating your preferences.

DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.



California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with the [Sites/ Mobile Application/ Facebook Application], you have the right to request removal of unwanted data that you publicly post]. To request removal of such data, please contact us security@netshieldcorp.com and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Sites but please be aware that the data may not be completely or comprehensively removed from our systems.

DO WE MAKE UPDATES TO THIS POLICY?

Yes, we will update this policy as necessary to stay compliant with relevant laws.

We may update this privacy policy from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.



HOW CAN YOU CONTACT US ABOUT THIS POLICY?

If you have questions or comments about this policy, contact us at securitysolutions@netshieldcorp.com or by post to:

Netshield Corporation
Attn: Director of Compliance
10 Tara Boulevard, Suite 140
Nashua, NH 03062

If you have any further questions or comments about us or our policies, email us at the above email or physical address.