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Rev. 4

### **Privacy Policy**

This Privacy Policy describes the ways in which ZeptoMetrix LLC (referred to hereinafter as “ZeptoMetrix”, “we”, “us” and “our”) collects, holds, and uses information about individual persons and/or the company they represent (referred to hereinafter as “you”, “yourself” and “your”) who visit [www.zeptometrix.com](http://www.zeptometrix.com) (the “Site”). We respect your right to control how much information you provide about yourself. The following Privacy Policy (“Policy”) describes how we collect, protect, and use information we receive from visitors to our Site. This Privacy Policy applies only to information we collect from or through a visitor’s use of this Site and does not apply to any other website or business activity of ZeptoMetrix.

BY USING THE SITE, YOU CONSENT TO THE COLLECTION AND USE OF INFORMATION (INCLUDING PERSONAL INFORMATION) AS SET FORTH IN THIS PRIVACY POLICY AND OUR TERMS OF USE. YOU ALSO ACKNOWLEDGE THAT WE MAY PERIODICALLY CHANGE, MODIFY, ADD TO OR REMOVE FROM, OR OTHERWISE UPDATE THIS PRIVACY POLICY IN OUR DISCRETION. When we do make any changes, modifications, additions, removals to this Privacy Policy, we will give you notice of the revised Privacy Policy by posting the revised Privacy Policy on the Site and by updating the “Last Revised” date at the top of this Privacy Policy. However, we will always handle your Personal Information (as defined below) with at least as much protection as provided in the version of the Privacy Policy that was in effect at the time of collection. You are responsible for regularly reviewing the current privacy policy. Our Privacy Policy is located on the Site’s homepage and is also available on any page where Personal Information (as defined below) is requested.

#### **1. Information We Collect and Lawful Basis of Processing**

We do not collect Personal Information on our Site unless you voluntarily provide some information about yourself via an electronic mail message or by filling out one of our online forms or data fields. ‘Personal Information’ means any information relating to an identified or identifiable natural person (a “Data Subject”), An identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person. For example, if you send us an email, we may use the information you provide to follow up via telephone or email.

- **Website Order Form**
- **Contact Us:** The Site provides the ability for you to submit your contact information. In order to submit a request, you enter Name, Email Address, Phone Number, Subject, and comments/questions.
- **Lawful Basis of Processing:** The lawful basis on which ZeptoMetrix processes this information is “Legitimate Interest” which means the processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect your Personal Information which overrides those legitimate interests.

No software or hardware techniques are employed by the Site to capture your email address or other Personal Information. Our hosting company may collect anonymous, aggregate information or statistics related to Site usage. These statistics indicate the total number of hits, the total number of page hits, and the number of kilobytes transferred from our Site and your IP address. We may access such information

to optimize your Site experience, to generally help us learn about the usage of the Site, to help us run and maintain the Site, to study traffic patterns, and to identify the website you visited immediately before entering this Site.

## **2. How We Use Personal Information Collected**

When Personal Information is collected from you, we generally let you know at the time of collection how we will use it - typically only to respond to your inquiry or to process your request or to better understand your needs and provide you with better service. Specifically, we use your Personal Information to help you complete a transaction, to communicate back to you, to update you on services and benefits, and to personalize our Site for you. From time to time, we may also use your Personal Information to contact you for market research or to provide you with marketing information we think would be of particular interest. At a minimum, we will always give you the ability to opt out of receiving such direct marketing or market research contact. We may need to share your Personal Information with our distributors or other companies with which we are contracted to provide services that you request. These companies are bound to use Personal Information we share with them only to perform the services for which we have contracted with them to provide. These third parties are not authorized to: (i) sell your Personal Information to third parties, (ii) disclose it to third parties except as may be required by law, as permitted by us or as stated in this Privacy Policy; or (iii) otherwise use your Personal Information in a manner inconsistent with the uses described in this Privacy Policy. We may disclose any information collected from you in special cases when we have reason to believe that disclosing the such information is necessary to identify, contact, or bring legal action against someone who may have breached our Terms of Use or who may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other users of the Site, or anyone else who could be harmed by such activities. We may also disclose any information collected when we reasonably believe that the law requires it (in the US or abroad). ZeptoMetrix will not use or share the Personal Information provided to us online in ways unrelated to the uses described above. ZeptoMetrix will make every effort to apply local country laws and policies where they differ from those in the United States, if any.

## **3. Right of access, correction and objection**

Whenever we process Personal Information, we take reasonable steps to ensure that your Personal Information is kept accurate and up to date for the purposes for which it was collected. In the case of direct marketing, we will provide you with a method to opt out of receiving further direct marketing materials or, if required by law, with a method to opt in. You may object to our processing of your Personal Information on the grounds that such processing is not: (i) in conformity with the uses described in this Privacy Policy; or (ii) reasonably required for our compliance with law. If you wish to contact us regarding our use of your Personal Information or object to the processing of your Personal Information, please email ZeptoMetrix at [custserv@zeptometrix.com](mailto:custserv@zeptometrix.com). If you contact us, please identify yourself, note your contact information, and provide the specific Personal Information you would like us to correct, update, or delete. Requests to delete Personal Information will be subject to any applicable legal and ethical reporting or document filing or retention obligations imposed on us.

## **4. Security and confidentiality**

We take measures reasonably designed to protect your Personal Information from loss, misuse, unauthorized access, disclosure, alteration, or destruction. Unfortunately, information transmitted on the Internet and/or stored on systems attached to the Internet is not 100% secure. As a result, we do not ensure, warrant, or guarantee the security or integrity of such information. We will not be responsible for disclosure of any information due to errors in transmission or the unauthorized acts of third parties.

## **5. Personal information and children**

The services available on this Site are intended for persons 18 years of age and older. We will not knowingly collect, use, or disclose Personal Information from a minor under the age of 18. We abide by laws designed to protect children.

## **6. Links to other sites**

For your convenience, this Site may provide links to various web sites that we do not control. When you click on one of these links, you will be transferred out of our Site and connected to the web site of the organization or company that you selected. We are not responsible for the nature, quality, or accuracy of the content or opinions expressed in such web sites, and such web sites are not investigated, monitored, or checked for quality, accuracy, or completeness by us. Inclusion of any linked web site on the Site does not imply or express an approval or endorsement of the linked web site by us, or of any of the content, opinions, products, or services provided on these web sites. Even if an affiliation exists between our Site and a third party web site, we exercise no control over linked sites. Each of these linked sites maintains its own independent privacy and data collection policies and procedures. If you visit a linked web site from our Site, we encourage you to consult that web site's privacy policy before providing any personal information and whenever interacting with any web site.

## **7. Contact us**

If you have any queries or complaints about our compliance with this Privacy Policy, or if you would like to make any recommendations or comments to improve the quality of our Privacy Policy, please email [custserv@zeptometrix.com](mailto:custserv@zeptometrix.com).

## **Cookie Policy**

Cookies are small text files that are stored locally on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. We will only store these cookies on your computer when you have provided us with your consent by clicking on the appropriate button(s) during your visit to the Site. Data collected via cookies will be retained until consent is withdrawn.

The three most important cookies include:

1. **Session:** Session cookies expire when you close your browser. They're used, for example, on e-commerce websites so you can continue browsing without losing what you put in your cart.
2. **Permanent:** Permanent cookies persist even when your browser is closed. They have an expiration date though and, by law, you cannot make them last more than 6 months. They are used to remember your passwords and login information so you don't have to re-enter them every time.
3. **Third-party:** Third-party cookies' attributes usually correspond to the website domain they are on. These are installed by third-party websites, such as advertisers. They gather data about your browsing habits, and allow them to track you across multiple websites.

The following is a list of cookies that may be set when accessing the Site. They are grouped by the type of function they provide. You can adjust your cookie settings at any time:

*Session & Permanent Cookies:*

- ajax.googleapis.com - Cache
- authorize.net - Cache
- godaddy.com – Cache
- zazzle.com - Cache, Cookies, HSTS Policy
- zeptomatrix.azurewebsites.net – Cache
- zeptomatrix.com - Cache, Cookies, Local Storage

*Third Party Cookies:*

- google-analytics.com - Cache
- googletagmanager.com - Cache
- gstatic.com - Cache
- zcache.com - Cache
- facebook.net - Cache
- google.com - Cache
- maps.googleapis.com - Cache
- fonts.googleapis.com - Cache
- khms0.googleapis.com - Cache

ZeptoMetrix must track the consent of cookies and therefore will need to collect your IP address. Since consent is tracked via your IP address, if you visit the Site from a different IP address, you will be prompted again for consent to the use of cookies.

**1. Personal Data Retention**

We will retain your Personal Information only for as long as is necessary. We maintain specific records management and retention policies and procedures, so that Personal Information is deleted after a reasonable time according to the following retention criteria:

- We retain the data as long as we have an ongoing relationship with you (in particular, if you have an account with us).
- We will only keep the data while your account is active or for as long as needed to provide services to you.
- We retain the data for as long as needed in order to comply with our global legal and contractual obligations.
- When consent is the legal basis, we retain the data collected via cookies until consent is withdrawn.

**2. EU Resident Data Subject Rights**

When using the Site and submitting Personal Information to us, you may have certain rights under the General Data Protection Regulation (GDPR). If you submit Personal Information from the European Union, you have the following rights:

*The right of access:* You have the right to get confirmation that your Personal Information is being processed, and the ability to access your Personal Information.

*The right to rectification:* You have the right to have your Personal Information corrected if it is inaccurate or incomplete.

*The right to erasure (right to be forgotten):* If the data is processed on the basis of consent or legitimate interest, you have the right to request the removal or deletion of your Personal Information if there is no compelling reason for us to continue processing it.

*The right to restrict processing:* You may have a right to ‘block’ or restrict the processing of your Personal Information. When your Personal Information is restricted, we are permitted to store your data, but not to process it further.

*The right to data portability:* If the data is processed on the basis of consent or contract, you have the right to request and get the Personal Information that you provided to us and use it for your own purposes. We will do our best to provide your data to you within 30 days of your request.

*The right to object:* You have the right to object to us processing your Personal Information for the following reasons:

- Processing was based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- Direct marketing (including profiling);
- Processing for purposes of scientific/historical research and statistics; and
- Rights in relation to automated decision-making and profiling.

### **3. Automated individual decision-making and profiling**

If the data is processed on the basis of legitimate interest, public interest, or vital interest, you will have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

### **4. Filing a complaint with authorities**

You have the right to file a complaint with supervisory authorities if your information has not been processed in compliance with the General Data Protection Regulation. If the supervisory authorities fail to address your complaint properly, you may have the right to a judicial remedy.

For further details about your rights under GDPR, visit <https://goo.gl/F41vAV>

### **5. Submitting a Data Subject Rights Request**

To submit a GDPR Data Subject Rights Request, please send an email to us at: [custserv@zeptometrix.com](mailto:custserv@zeptometrix.com) with the following information:

- First Name
- Last Name
- Email address
- Relationship to ZeptoMetrix (e.g. Former Contractor, Customer, Former Customer, Potential Customer)
- Request