

Odaseva Privacy Policy

Last Updated: May 15, 2018

As a provider of data management services for salesforce.com applications, privacy and data protection are of the utmost importance to Odaseva Technologies ("**Odaseva**", "**we**", or "**us**").

We developed this Privacy Policy to describe how we collect, use, disclose, and otherwise process Personal Data about you. If you have any questions or comments regarding this Privacy Policy, please contact us at data-privacy@odaseva.com.

1. What is Personal Data?

"**Personal Data**" is information that, either alone or in combination with other information, identifies you or can be used to identify you. When we combine other information (*i.e.*, information that does not, on its own, identify you) with Personal Data about you, we treat the combined information as Personal Data.

2. Application of this Privacy Policy to Odaseva Sites and Services

This Privacy Policy describes how Odaseva processes Personal Data that it collects when:

- You use Odaseva-operated websites that link to this Privacy Policy, including odaseva.com (collectively, the "**Site**"); and
- You use Odaseva products and services (collectively, the "**Service**").

Throughout this Privacy Policy, we describe how our data processing and privacy practices vary between our Site and Service.

3. What Personal Data Do We Collect and For What Purposes

If you are a user of our Service (a "**Customer**") or otherwise visit our Site, we may collect the following type of information through your use of the Site:

- **Contact, Account, and Billing Information:** We process Personal Data that you provide through creation and management of your account, such as your name, e-mail address, job title, phone number, and payment information. We process this Personal Data only as necessary to provide the Service to you under the terms of our Master Services Agreement or for our legitimate interests in providing a Service that meets your needs and expectations. For example, we use this information to bill you for your use of the Service; respond to your inquiries regarding the Service; facilitate our account recovery services in the event you forget your log-in credentials; and for other purposes related to the reasons for which you provide Personal Data.

We use your email address to contact you from time to time in furtherance of our legitimate interests in providing you with information regarding the Service, such as invoices, payment receipts, and information regarding critical updates to your subscription. Unless you opt out using the process

described in Section 6, below, we will also send you a newsletter, as well as information on new features available with an upgrade to your subscription.

- **User ID and Password Information.** We process Customers' user ID and password information to enable them to log into and use the Service. We process this Personal Data only as necessary to provide the Service to you under our Master Services Agreement.
- **IP Address, Header Information, and Audit Trails:** We automatically collect certain information when you visit our Site, such as IP address and Header Information. We also provide our customers' administrators with detailed Audit Trails "**Header Information**" is information such as browser type, operating system, language, screen resolution, referring URL, etc. provided to our web server by your browser. We have a legitimate interest in using such information to assist in log-in, systems administration purposes, information security and abuse prevention, and to track user trends.

4. How We Use Cookies and Similar Technology

To help operate the Site and the Service, enhance your experience, and collect information about online activity, we place small data files on your device known as "cookies," or we use similar technologies (e.g., pixel tags, web beacons, local shared objects). Cookies and similar technologies enable us to personalize the Site, and help make our Site load faster (through "load balancing" technology). These technologies may allow us to store and manage your preferences and settings; measure and analyze how you use the Services and effectiveness of our communications; administer the Site, offer targeted products, programs, and services; and help us improve Site, our products, services, and security.

Most browsers provide you with the ability to block, delete, or disable these technologies. If you choose to reject cookies or similar technologies, some features of our Site and Service may not be available or some functionality may be limited or unavailable. Please review your browser manufacturer's help pages for assistance with changing your settings.

5. To Whom We Disclose Personal Data

We will not disclose Personal Data about you except as set forth in this Privacy Policy or with your consent.

This section describes to whom we disclose Personal Data, and for what purposes:

- **Our Service Providers.** We employ service providers to perform tasks on our behalf and to assist us in providing the Site and Service. For more information, please see our [List of Service Providers](#)
- **Google Analytics.** We use Google Analytics, an analytics service, along with our own Service, to help us analyze the traffic on our Site. For more information on Google Analytics' processing of Personal Data, please see "[How Google uses data when you use our partners' sites or apps.](#)"

- **Companies Involved in Mergers and Acquisition Transactions and Other Corporate Reorganizations.** In some cases, Odaseva may choose to buy or sell assets. In these types of transactions, user data (including Personal Data) is typically one of the business assets transferred. Moreover, if Odaseva, or substantially all of its assets, were acquired, user data would be one of the assets that is reviewed and transferred or acquired by a third party.
- **Law Enforcement, Government Agencies, and Courts:** We may disclose Personal Data at the request of law enforcement or government agencies or in response to subpoenas, court orders, or other legal process to establish, protect, or exercise our legal or other rights or to defend against a legal claim or as otherwise required or allowed by law, or to protect the rights, property, or safety of a Customer or any other person. We may also disclose Personal Data to investigate or prevent a violation by you of any contractual or other relationship with us or your illegal or harmful activity.

6. How You Can Opt-Out

- **Email Opt-Out.** Customers may choose not to receive marketing emails from us and can opt out of such e-mails through their account settings or by utilizing the opt-out functionality included in marketing emails.

7. Personal Data Transferred from the EU or Switzerland

Odaseva complies with the EU-US Privacy Shield Framework and Swiss-US Privacy Shield Framework (collectively, “*Privacy Shield*”) as set forth by the US Department of Commerce regarding the collection, use, and retention of Personal Data from European Union (the “*EU*”) member countries and Switzerland. Odaseva has certified to the Department of Commerce that it adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement, and Liability. A violation of our commitment to Privacy Shield may be investigated by the Federal Trade Commission and/or the United States Department of Commerce. If there is any conflict between the policies in this Privacy Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, to the extent available, please visit <https://www.privacyshield.gov>.

In compliance with the Privacy Shield Principles, Odaseva commits to resolve complaints about your privacy and our collection or use of Personal Data about you. Persons from the EU or Switzerland who have inquiries or complaints regarding this Privacy Policy should first contact us via email at: data-privacy@odaseva.com.

Odaseva has committed to refer unresolved privacy complaints under the Privacy Shield Principles to JAMS, an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <https://www.jamsadr.com/eu-us-privacy-shield> for more information and to file a complaint.

These recourse mechanisms are available at no cost to you. Damages may be awarded in accordance with applicable law.

Please note that if your complaint is not resolved through these channels, under limited circumstances, a binding arbitration option may be available before a Privacy Shield Panel.

In cases of onward transfer to third parties of data of EU or Swiss individuals received pursuant to the Privacy Shield, Odaseva is potentially liable.

8. Your Rights

As a controller of the Personal Data collected by or through the Site and in connection with your use of the Services, we take steps to help ensure that you are able to exercise rights regarding Personal Data about you in accordance with applicable law.

If you would like to access, amend, erase, export (*i.e.*, data portability or right to be forgotten), or object to or restrict the processing of Personal Data collected via the Site, you may submit a request to support@odaseva.com. We will promptly review all such requests in accordance with applicable laws. Our opt-out feature, described in Section 6, also enables you to exercise your right to object to certain processing activities.

Depending on where you live, you may have a right to lodge a complaint with a supervisory authority or other regulatory agency if you believe that we have violated any of the rights concerning Personal Data about you. We encourage you to first reach out to us at data-privacy@odaseva.com, so we have an opportunity to address your concerns directly before you do so.

9. Personal Data Relating To Children

We do not knowingly provide access to the Service to children under the age of sixteen (16). If we learn that we have collected Personal Data from children, we will promptly take steps to delete such Personal Data.

10. Retention of Personal Data

We will retain Personal Data for the period necessary to fulfill the purposes for which Personal Data has been collected as outlined in this Privacy Policy unless a longer retention period is required by law.

We dispose of our copies of Personal Data that we retain on behalf of our customers until the expiration of our contracts with such customers. Because we process Personal Data on behalf of our customers, we cannot control how long customers retain their copies of Personal Data.

Where feasible, we dispose of data, including Personal Data, on a regular schedule. For example, we retain analytics information relating to visitors of our Site for approximately 3 years.

11. How We Protect the Confidentiality and Integrity of Personal Data

We have implemented security measures to protect Personal Data from loss, misuse, and alteration. We use industry-standard practices such as encrypted storage, firewalls, and password protection systems to safeguard the confidentiality of Personal Data. We take steps to help ensure our employees and contractors are aware of their information security obligations, and we restrict employee and contractor access to Personal Data. Despite these efforts to store Personal Data in a secure operating environment that is not available to the public, we cannot guarantee the security of Personal Data during its transmission or its storage on our systems. Further, while we attempt to ensure the integrity and security of Personal Data, we cannot guarantee that our security measures will prevent third parties such as so-called hackers from illegally obtaining access to Personal Data. We do not represent or warrant that Personal Data about you will be protected against, loss, misuse, or alteration by third parties.

12. Links to Third Party Websites

Our Site may contain links to third party websites. Please be aware that we are not responsible for the privacy practices of third party websites you choose to visit. If you provide any information directly to parties other than us, different rules may apply to the use or disclosure of that information. We encourage you to investigate and ask questions before disclosing Personal Data to third parties.

13. Changes to this Privacy Policy

We may revise and update this Privacy Policy from time to time and will post the updated Privacy Policy to the Site. If these changes are material (*i.e.*, changes we believe you will find important), we will provide notice to you by email or by posting notice of the changes on our Site. Where required by applicable law, we will obtain your consent. You can see when this Privacy Policy was updated by reviewing the Last Updated legend on the top of this Privacy Policy. **UNLESS OTHERWISE INDICATED, ANY CHANGES TO THIS PRIVACY POLICY WILL APPLY IMMEDIATELY UPON POSTING TO THE SITE.**

14. Contacting Us

If there are any questions regarding this Privacy Policy you may email us at data-privacy@odaseva.com or contact us using the information below:

Odaseva Technologies

Attn: Privacy Officer

185 Alewife Brook Parkway, Suite 410

Cambridge, MA 02138

United States of America