

Vantiq Privacy Policy – version 1 April 2021

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1. **ABOUT THIS PRIVACY POLICY.** This privacy policy sets out how and why Vantiq (referred to as “Vantiq”, “we”, “us” or “our” in this privacy policy) collects and uses your personal data when you visit this website or use the Vantiq services, including any data you may provide through the website or the services or any data that we or our customers may collect via your use of the Vantiq mobile app.

The policy also explains how we protect your information and the privacy rights you have by law.

It is important that you read this privacy policy together with any other privacy notice we may provide you when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them. It is also important that you read any privacy policies or other terms or guidelines published by our customers in connection with their, and your, use of the Vantiq mobile app.

We update this privacy policy from time to time. This version was last updated on 30 March 2021. When we make changes to our privacy policy, we will keep the prior version on our website at [HYPERLINK]. For information on any changes we have made, please contact us at privacy@vantiq.com.

2. WHO WE ARE

Vantiq provides application platform services allowing every company to rapidly build, deploy and run real-time, event-driven business applications based on data-streams of any kind, including data from IoT and mobile devices, existing enterprise systems, and people.

We have also created a mobile app that allows our customers to activate and use various features of a mobile device (camera, audio, location services, etc.) to enable collection and analyses of data points selected by our customers. Aside from storage and processing obligations agreed with our customers, we do not use the personal data collected via the Vantiq mobile app in a format that identifies individuals for our own purposes and we do not accept any responsibility or liability for the use, by customers, of any personal data that may be collected through the Vantiq mobile app. We therefore recommend that you contact our customers should you require further information regarding the use of personal data collected by the Vantiq mobile app.

We have appointed a Data Protection Representative for managing our data protection matters and fielding questions about this privacy policy. The contact details of our Data Protection Representative are set out below in

the Contact Details (section 16). [\[LINK\]](#)

3. THE TYPES OF DATA WE COLLECT AND HOW WE COLLECT IT

Types of Data. We collect, use, store and transfer different types of both personal and non-personal information through our website, the Vantiq mobile app, and the Vantiq platform services.

Personal data, or personal information means any information about an individual from which that person can be identified. It does not include data from which you cannot identify a person.

We collect the following categories of personal data about you:

- **Identity Data** includes first name, last name, username, employer, job title.
- **Contact Data** includes email address and telephone numbers.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website, the Vantiq mobile app, or the Vantiq platform services.
- **Usage Data** includes information about how you use the Vantiq mobile app, our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Device Data** includes the type of mobile device and an automatically generated unique identifier for your device.
- **App Data** includes data collected from you upon download and use of the Vantiq mobile app, including information relating to your activities as an employee of a customer, data specified by our customers for collection by the Vantiq mobile app and, subject to you permitting the app to collect this information, location data.

We also collect, use and share **non-personal information** such as statistical data for any purpose. This non-personal information may be derived from your personal data but is not considered personal data by the law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

If we combine any non-personal information with your personal data so that you can be identified from it, we will treat the combined data as personal data which will be used and protected in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (such as details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

How we collect data. We collect data in different ways through our website and/or the Vantiq mobile app. You may provide us the data directly when you:

- download and use the Vantiq mobile app;
- register an account;
- sign up to receive white papers or newsletters;
- purchase or subscribe to a product or service;
- request marketing materials to be sent to you; or
- provide us with feedback or contact us.

Some services selected by our customers require your location. The Vantiq mobile app uses your device's GPS, network or base station data to determine your location, if you agree to its collection. If you wish to allow the Vantiq mobile app to collect location data, you will be asked to consent to your data being used for this purpose when you first use the Vantiq mobile app. If you agree, the Vantiq mobile app may automatically collect and share

your location data for use by our customers. Please be aware that location tracking may be a core function of your use of the Vantiq mobile app on behalf of a customer and that prohibiting location tracking may result in a failure of the customer's products/services/business processes.

Additionally, through the use of cookies, server logs and similar technologies, we may automatically collect Technical Data about your equipment, browsing activity and patterns. Please see the section below on COOKIES and our Cookie policy posted at <https://vantiq.com/privacy-policy/> for more information.

We may also receive personal data about you from certain third parties as follows:

Vantiq MOBILE APP ONLY

- Our customers – Vantiq receives and stores information specified by our customers and collected via the Vantiq mobile app. As explained above, we may store that information on behalf of our customers but we do not otherwise use the personal data collected via the Vantiq mobile app in a format that identifies individuals for our own purposes;

Vantiq WEBSITE ONLY

- Salesforce and Pardot – Vantiq uses Salesforce and Pardot as the primary tools to market the company's products and services directly to our customer base. Information shared with Vantiq is only accessible through login credentials through Salesforce's online web portal.
- Microsoft Office 365 – Vantiq uses Microsoft SharePoint as a Partner Portal to share company information as well as Vantiq customer information. The SharePoint is only accessible to select Vantiq appointed Partners. Information shared with Vantiq and Vantiq Partners is only accessible through login credentials through Microsoft's 365 Office Suite online web portal.
- Google Analytics – Vantiq uses Google Analytics to monitor Vantiq website traffic. Information shared with Vantiq is only accessible through login credentials through Google Analytics online web portal.
- Zoom Meeting & Webinar - Vantiq uses Zoom to market the company's product and services directly to our customer base through either client/prospect meetings and webinars. Information shared with Vantiq is only accessible through login credentials using Zoom's online web portal.
- LeadLander - Vantiq uses LeadLander to monitor Vantiq's website traffic. Information shared with Vantiq is only accessible through login credentials using LeadLander's online web portal.
- Instabot - Vantiq uses Instabot to assist website visitors with answering company-oriented questions and providing additional information per visitor request. Information shared with Vantiq is only accessible through login credentials using Instabot's online web portal.
- ZoomInfo – Vantiq uses ZoomInfo to ensure contact information of existing contacts stay's up to date allowing Vantiq to continue to provide company, product, service updates until client informs us otherwise. Information shared with Vantiq is only accessible through login credentials using ZoomInfo's online web portal.
- Google Tag Manager - Vantiq uses Google Tag Manager to track internal link clicks on the Vantiq website. Information shared with Vantiq is only accessible through login credentials via the Google Tag Manager web portal and Google Analytics web portal.
- SEMrush - Vantiq uses SEMrush to monitor google search result rankings for important Vantiq keywords as well as monitor the overall health of the website (such as broken links, duplicate meta descriptions, etc.). Information shared with Vantiq is only accessible through login credentials via the SEMRush web portal.

4. WHAT HAPPENS IF YOU FAIL TO PROVIDE PERSONAL DATA TO US? If you fail to provide personal data that we need to perform a contract with you or by law, then we may not be able to provide you with the product or service the contract relates to. We will notify you when this is the case.

5. COOKIES We may use cookies on our website. For more information on how we may use cookies and how you can use the My Cookie Preferences panel to disable or refuse cookies, please see our cookie policy posted at <https://vantiq.com/privacy-policy/>.

6. HOW WE USE YOUR DATA - THE PURPOSES AND LAWFUL GROUNDS FOR PROCESSING

Purposes and Lawful Bases. We will use your personal data only where we have a lawful basis for doing so. We process your personal data for a number of purposes. The lawful basis for our processing of your personal data will depend on the purpose for which it was obtained. The table below sets out the purposes for which we may process your personal data and the relevant lawful basis/bases that allow for that processing. We suggest you review the privacy policies of our customers for more information on how those customers process data collected via the Vantiq mobile app:

Purpose of Processing	Type(s) of Data	Our Lawful Basis for Processing
Managing our relationship with you	<ul style="list-style-type: none"> ● Identity Data ● Contact Data 	<ul style="list-style-type: none"> ● Necessary to comply with a legal obligation ● To perform a contract with you ● Necessary for our legitimate interests*
Managing our relationship with our customers	<ul style="list-style-type: none"> ● Device Data ● Location Data 	<ul style="list-style-type: none"> ● Your consent ● Necessary for our legitimate interests* - in complying with our contractual obligations to our customers
To install the Vantiq mobile app and register you as a new App user	<ul style="list-style-type: none"> ● Identity Data ● Contact Data ● Financial Data ● Device Data 	<ul style="list-style-type: none"> ● Your consent ● To perform a contract with you
Administration purposes and the protection of our business, the website and the platform services - e.g. troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data	<ul style="list-style-type: none"> ● Identity Data ● Contact Data ● Technical Data 	<ul style="list-style-type: none"> ● Necessary for our legitimate interests* - in running our business, the provision of administration and IT services, network security and fraud prevention and for business reorganisations or group restructuring exercises ● Necessary to comply with a legal obligation
To register you as a new customer/user	<ul style="list-style-type: none"> ● Identity ● Contact 	To perform a contract with you
Processing and delivery of your order for services including Managing payments and charges and recovering outstanding payments	<ul style="list-style-type: none"> ● Identity ● Contact ● Transaction ● Marketing and Communications Data 	<ul style="list-style-type: none"> ● To perform a contract with you ● Necessary for legitimate interests* in recovering debts due to us

<p>Marketing and promotions:</p> <ul style="list-style-type: none"> ● Sending you marketing communications or newsletters ● Asking you to complete a survey or leave a review ● To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you ● To use data analytics to improve our website, products/services, marketing, customer relationships and experiences ● To make suggestions and recommendations to you about goods or services that may be of interest to you 	<ul style="list-style-type: none"> ● Identity Data ● Contact Data ● Profile Data ● Usage Data ● Marketing and Communications Data ● Technical Data 	<ul style="list-style-type: none"> ● Consent ● Necessary for our legitimate interests* (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy) ● Necessary for our legitimate interests* (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) ● Necessary for our legitimate interests* (to develop our products/services and grow our business)
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*“**Legitimate interests**” means our legitimate interests in conducting and managing our business or the interests of third party where these interests are not overridden by your fundamental rights, interests and freedoms.

Changes to the Purposes of Processing. We will only process your personal data for the purpose(s) for which we collected it. If we do need to use your personal data for a new purpose, we will notify you of this and explain the lawful basis we will be relying on.

Please be aware that we may process your personal data without your knowledge or consent where this is required or permitted by law.

7. **MARKETING.** By sending an email to privacy@vantiq.com you can control how we send you marketing communications. We will send you marketing communications if you have requested information from us or goods or purchased services from us, or if you have provided us with your details when registering for a promotion, and in each case, where you have not opted out of receiving that marketing.

Aside from sending an email to privacy@vantiq.com, you can opt out of receiving marketing communications by following the opt-out or unsubscribe links on any marketing message sent to you or by contacting us at any time.

8. **HOW WE SHARE YOUR PERSONAL DATA AND WITH WHOM.** We may need to share your information with certain third parties - these third parties are as follows:

- Other companies in the [Vantiq] Group [acting as joint controllers or processors] and located in the UK, France and elsewhere in the EEA as Vantiq opens offices in other EEA countries. A list of our [office locations](#) from the Vantiq website.
- Our customers, acting as controllers, who use the data collected via the Vantiq mobile app and/or our platform application services. We recommend that you review the privacy policies of these customers to understand what personal data they process and on what basis. If you’re unsure on whose behalf your data is collected, please contact us at the address below and we will assist with your query.
- Our suppliers [acting as processors], which includes Vantiq Partner's ecosystem located within the European Union.
- Our professional advisers including lawyers, bankers, auditors, insurers who provide us with professional

services based in [Paris, France and London, United Kingdom]

- 9. THIRD PARTY LINKS.** This website and/or the Vantiq mobile app may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy policies. When you leave our website, we strongly recommend you read the privacy policy of every website you visit.
- 10. REQUESTING ACCESS TO YOUR PERSONAL DATA.** Under data protection law, individuals have the right to request access to information about them that we hold. To make a request for your personal data please contact privacy@vantiq.com.

11. INTERNATIONAL TRANSFERS

We share your personal data in certain ways that will involve transferring your personal data to countries outside of the European Economic Area whose laws do not afford the same level of protection to personal data as within the EU and/or the UK. We do this in the following ways:

- Vantiq [Group] operating in the USA;
- Vantiq Partner's as per those listed on [Vantiq Partner Page](#): including Fit-One (Japan), GongKong (China), Software Route (Israel).

- 12.** Whenever we transfer your personal data out of the EEA, we ensure that the transfer takes place in accordance with applicable data protection laws. **DATA SECURITY.** Whilst we store and use your personal data we will ensure the appropriate security of your personal data including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures. All information collected via the Vantiq mobile app is stored on our secured servers and access to that information is restricted to the customer on whose behalf you are using the Vantiq mobile app.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach as is required by the law.

- 13. RETENTION OF YOUR DATA.** Without affecting your other rights, we will not keep your personal data longer than is necessary for the purpose for which we, or our customers use it and will delete or destroy it when it is no longer required.

In some circumstances we may anonymise your personal data (so that it can no longer identify you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

- 14. YOUR OTHER PRIVACY RIGHTS.** By law you have certain additional privacy rights. These are to:

- **be informed** of how we are processing your personal data – this privacy policy serves to explain this to you but please do get in touch if you have any questions;
- have your personal **data corrected** if it is inaccurate or incomplete;
- have your **data erased (the right to be forgotten)** in certain circumstances – e.g. where it is no longer needed by us the purpose for which it was collected, or you have withdrawn your consent. Please note however, that in certain circumstances, we may not be able to comply with your request of erasure for legal reasons. If this is the case, we will notify you at the time you request erasure.;
- **restrict the use of your data** in certain circumstances e.g. where you have told us the data is inaccurate and we are in the process of checking this. In such circumstances we will continue to store your data but will not process it further until we have checked and confirmed whether the data is inaccurate;
- **object to the processing of your data** in certain circumstances - e.g. you may object to processing of your data for direct marketing purposes;
- **object to decisions being taken by automated means;**
- **request the transfer of your personal data to a third party.** Please note this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you; and

- **to withdraw your consent at any time** to processing where we are relying on consent as the lawful basis - e.g. to receiving marketing communications. Please note if you withdraw your consent, we may not be able to provide certain products and services to you - We will let you know if this is the case at the time you withdraw your consent.

If you have any concerns about the way we are collecting or using your personal data, please contact us in the first instance. You also have **the right to lodge a complaint** with the UK's supervisory authority for data protection matters - the Information Commissioner's Office at <https://ico.org.uk/concerns/>

- 15. CHANGES TO YOUR PERSONAL DATA.** It is important that the personal data we hold about you is accurate and current. Please let us know if your personal data changes and we need to update our records.
- 16. CONTACT DETAILS.** If you have any questions about this privacy policy or about your legal rights, please contact the DPO using the details set out below:

Vantiq
Data Protection Officer privacy@vantiq.com
2033 N Main St, Suite 440
Walnut Creek CA USA 94596