

# iSpring Privacy Policy

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## **Introduction**

iSpring respects your right to privacy and we understand that, when you visit our websites and use our products and services or otherwise interact with us (for example, by viewing our webinars), you prefer to control the way you share your personal information (“Personal Data” as defined below) and preferences. iSpring offers a wide range of products, including desktop products, web-based services, custom, and support services. We refer to all of these software products, together with our other services and websites, as “Services” in this Privacy Policy.

For purposes of this Privacy Policy, “iSpring,” “us,” “we,” and “our” mean either iSpring Group FZCO, the United Arab Emirates company, or a company indicated on the [Company page](#), as the case may be.

The terms “user,” “you,” and “your” refer to Sites visitors, customers and any other users of the Sites and the Services. For more information about iSpring companies please visit the [company page](#).

The term “Personal Data” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to an individual. It does not include aggregated or deidentified information that is maintained in a form that is not reasonably capable of being associated with or linked to an individual.

iSpring collects, stores, uses and discloses the following categories of Personal Data:

(1) Customer Data: Personal Data concerning our business customers' ("Customers") internal focal persons who directly engage with iSpring concerning their organizational account, and users of the Services on behalf of such Customers, e.g., the account administrators and users, billing contacts and authorized signatories on behalf of the Customer; as well as the Customer's business needs and preferences, as identified to us or recognized through our engagement with them;

(2) User Data: Personal Data that we process and manage on behalf of our Customers, as part of our Services.

We process such User Data on behalf of and under the instruction of the respective Customer, in accordance with our [Data Processing Agreement](#) with them. Accordingly, this Privacy Policy (which describes iSpring's privacy and data processing practices) does not apply to such processing done on its Customers' behalf. To learn about the privacy policy and practices of our Customer, please contact them directly.

(3) Prospect Data: data relating to visitors of our Sites, participants at our events, and any other prospective customer, user or partner (collectively, "Prospects") who visits or otherwise interacts with our Sites, online ads and content, emails, integrations or communications under our control.

iSpring have developed this Privacy Policy (the "Policy") to ensure you understand how we collect, use, disclose, and store your Personal Data. The Policy applies to your interactions with iSpring websites which receive data and are linking to this Privacy Policy (the "Sites"). It does not apply to iSpring Sites that do not display or linked to this Privacy Policy or that have their own privacy policy. It also does not apply to iSpring services and products unless they are linking to this Privacy Policy.

### **Agreement to this Policy**

Please read this Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Services.

By accessing or using our Services, you confirm that you have read this Policy. This Policy may change from time to time. If You continue to use our Services after we make changes, your use is deemed to be acceptance of those changes, so please check the Policy periodically for updates. The date that this Policy was last amended is set out at the top of the Policy and is described as the Policy's "Review Date".

### **GDPR Compliance**

iSpring complies with the Regulation 2016/679/EU of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free

movement of such data (“GDPR”). iSpring acts as both a data controller and a data processor under GDPR.

iSpring has implemented the following requirements under the GDPR, including but not limited to:

- A record of your Personal Data processing activities;
- Adequate organizational and technical protection measures;
- Request forms and internal instructions for Privacy by Design & Default, Data Portability, and Data Subject Rights like the Right to be Forgotten.

### **International Transfer of Personal Data**

Your Personal Data may be collected, transferred to and stored by us in the United States of America and other countries. Your Personal Data may be processed outside of your jurisdiction wherever we or our third-party service providers operate for the purpose of providing you with the Services. The Personal Data of individuals located in the European Economic Area (EEA), the European Union (EU), Switzerland and the United Kingdom is stored and processed on servers based in Ireland and Germany and stored as backup in Germany. Regardless of where your information is stored or processed, we apply the same protections described in this Policy and ensure that the third-party recipients of your Personal Data offer an adequate level of protection and security. We use [the Data Processing Agreement \(DPA\)](#) as part of an applicable license or service agreement or other written or electronic agreement between you and iSpring for the purchase of iSpring Services. We also use the [Standard Contractual Clauses](#) approved by the European Commission as a means of ensuring adequate protection when transferring data outside of the EEA, EU, Switzerland and the United Kingdom.

### **Data Protection Officer**

Our Data Protection Officer can be contacted in writing at [dpo@ispring.com](mailto:dpo@ispring.com)

### **How iSpring determines your location**

iSpring Sites you access, can determine your physical geographical location in a few ways. Your IP address reveals your general area, unless you use a VPN. iSpring Sites can also ask for a more precise location when you purchase iSpring Services to determine the iSpring Company which will provide the Services to you, process your Personal Data and how much local tax iSpring will charge on the Services.

### **How iSpring may collect information about you in our role as data controller**

We collect information about you and determine the purposes and means of processing our Customers’ and Prospects’ Personal Data in our role as data controller when you input it into the Services or otherwise provide it directly to us.

**Site account and Profile Information:** We collect information about you when you order Services from iSpring, register to create a site account, create

or modify your profile, set preferences, sign-up for or make purchases through the Services. We keep track of your preferences when you select settings within the Services.

***Information you provide through our support center:*** The Services also include our customer support, where you may choose to submit information regarding a problem you are experiencing with a Service. Whether you designate yourself as a technical contact, open a support ticket, speak to one of our representatives directly or otherwise engage with our support team, you will be asked to provide contact information, a summary of the problem you are experiencing, and any other documentation, screenshots or information that would be helpful in resolving the issue.

***Subscription to iSpring newsletters and webinars.*** We collect information about you when you subscribe to our webinars and newsletters provided through e-mail, SMS or messengers services. You can set your communication preferences from your site account or opt-out at any time.

***Information You provide through our chat services*** when contact with iSpring in a chat session.

This Privacy also applies to the processing of Personal Data collected by us when you:

- Visit our branded social media pages;
- Register for, attend or take part in our events, webinars, programs or contests;
- Participate in community; or
- Participate in surveys, research or other similar data collection facilitated by us.

### **Information we collect automatically when you use the Services**

We collect information about you when you use our Services, including browsing our websites and taking certain actions within the Services.

***Your use of the Services:*** We keep track of certain information about you when you interact with any of our Services. This information includes the features you use; information about the system configuration, PowerPoint version you use; time you spent using the Services; the links you click on; the type, size and filenames of attachments you upload to the Services; frequently used search terms; and how you interact with others on the Services.

***Device and Connection Information:*** We collect information about your computer, phone, tablet, or other devices you use to access the Services. This device information includes your connection type and settings when you install, access, update or use our Services. We also collect information through your device about your operating system, browser type, IP address, URLs of referring/exit pages, device identifiers, and crash data. We use your IP address and/or country preference in order to approximate your location to provide you with a better Service experience.

**Cookies:** iSpring uses essential first-party cookies to provide functionality of the Sites and to recognize you across different Services and devices, and third-party cookies for analytics and content-sharing. iSpring uses Google Analytics (Google LLC, US) cookies to generate statistical data on how the visitor uses the website. These cookies allow us to track and analyze data traffic and are used to track the behavior of the user, to improve the user experience.

For more information, please see our [Cookie Policy](#), which includes information on how to control or opt-out of the cookies and other tracking technologies.

### **Information we receive from other sources**

We receive information about you from other Service users, from third-party services, from our related companies, and from our business partners.

**Other users of the Services:** Other users of our Services may provide information about you when they submit content through the Services. For example, you may be mentioned in a support ticket opened by someone else. We also receive your email address from other Service users when they provide it in order to invite you to the Services. Similarly, an administrator may provide your contact information when they designate you as the billing or technical contact on your company's site account.

**iSpring Partners:** We work with a global network of partners who help us to market and promote our products, generate leads for us, and resell our products. Some of these partners provide consulting, training, and other services connected to our products. We receive information from these partners, such as contact information, company name, what iSpring products you have purchased or may be interested in, evaluation information you have provided, what events you have attended, and what country you are in.

**Other Partners:** We receive information about you and your activities on the Services from third-party partners, such as advertising and market research partners who provide us with information about your interest in and engagement with our Services and online advertisements.

**Information we receive from third-party integrations.** If, when using the iSpring Web services, You or Your administrator choose to use or connect to third-party integrations (e.g., YouTube, Zoom) through the iSpring web services, such third parties may allow iSpring to have access to and store additional information about Your interaction with those services as it relates to your use of the iSpring web services. If You initiate these connections, You also understand that iSpring will share information about You that is required to enable Your use of the third-party integration through the iSpring web services. If You do not wish to have this information shared, do not initiate these connections. By enabling these connections, You authorize iSpring to connect and access the information provided through these connections, and You understand that the privacy policies of these third parties govern such connections.

**YouTube API Services:** Our Services include YouTube API Services. By accessing or using our Services, You agree to YouTube's Terms of Service (<https://www.youtube.com/t/terms>) and Google Privacy Policy at <http://www.google.com/policies/privacy>.

**The Zoom Apps:** Our Services are integrated with the Zoom Meetings and Zoom Webinars (Zoom Apps). By accessing or using our Services, You agree to Zoom Privacy Statement at [https://zoom.us/privacy#\\_Toc44414847](https://zoom.us/privacy#_Toc44414847).

## **What information iSpring may collect about you in our role as data controller**

iSpring may collect the following information about you:

- Your name, email address, phone number, company name, title and business/private address;
- Your iSpring site account information – such as iSpring Services you ordered, domain name registration information, the IP addresses assigned to you, the use of iSpring Services or any other information related to your site account;
- Your contact with iSpring – such as a note or recording of a call you make to iSpring, a chat record when you engage in a chat session with iSpring through a chat service, SMS or a messenger, an email or letter you send to iSpring or other records of any contact you have with iSpring;
- The e-mail addresses of the users who receive the results of the test or dialogue simulations if the software product with test or dialogue simulations functionality uses the function of collecting user data with sending to an email address;
- The e-mail addresses of the users who pass tests or dialogue simulations created using the software product with test/simulation functionality if the software product uses the function of collecting user data with sending to e-mail addresses. You may create tests or simulations with a user input form by sending the test results to the server. Then iSpring does not receive any data, and all the data will be sent immediately to Your server;
- The e-mail addresses of the users (instructors) who receive the results of the test or dialogue simulations of other users to review the test or quiz. You are responsible for submitting the correct e-mail addresses while using this functionality;
- Information provided by you to iSpring when you notify iSpring of a (suspected) breach of acceptable use of iSpring Services;
- Your photo when you send us a testimonial and video footage of you when we record your video review about iSpring Services;
- The information you provide using YouTube API Features and functionality;
- The information you provide using the Zoom Apps features and functionality.

## **Why iSpring processes your personal information in our role as data controller**

iSpring processes your Personal Data for the following purposes:

- Processing of orders and provision of Services;
- Sending test or dialogue simulations results to You or users of the test or dialogue simulations;

- Conducting market research, conducting retention and customer satisfaction surveys, conducting marketing activities (including through e-mail, SMS and messengers newsletters, social media and onsite/offsite and online/offline advertisement), conducting sales activities (including analyzing your Personal Data and your use of iSpring Services for making (personalized) offers and quotes with the aim of entering into a customer relationship, and/or maintaining, renewing or expanding a customer relationship);
- Communicating with customers (a) to provide information about Services of iSpring and affiliated companies, (b) to provide information about offers, orders, provision of Services, order status and payment, (c) to provide support and maintenance services, (d) to handle complaints, (e) to answer questions from (potential) customers, and (f) to remind you of subscription expirations by sending you e-mail/SMS/messengers notifications. These communications are part of the Services and in most cases, you cannot opt out of them. If an opt out is available, you will find that option within the communication itself or in your account settings.
- Investigating and processing suspected violations of acceptable use of iSpring Services;
- Complying with statutory obligations, including (a) provision of data to authorized authorities in the context of criminal investigations, (b) complying with (applicable) data retention obligations, and (c) the provision to third parties of Personal Data concerning customers in connection with an infringement of these third parties' rights.

### **How we share your personal information in our role as data controller**

iSpring is not using your personal information with the purposes of selling. There are, however, certain circumstances in which iSpring may share and disclose Personal Data with certain third parties without further notice to you, as described below.

Please contact us at [support@ispring.com](mailto:support@ispring.com) to opt out of the information sharing with a third party:

- iSpring may engage selected third-party companies to perform services complementary to our own. Such service providers include hosting and server co-location services, communications and content delivery networks, chat and messengers services, data security services, billing and payment processing services, fraud detection and prevention services, web and product analytics, e-mail distribution and monitoring services, session or activity recording services, remote access services, content transcription and analysis services, performance measurement, data optimization and marketing services, social and advertising networks, content and data enrichment providers, event production and hosting services, e-mail, voicemails, support, enablement and customer relation management systems (collectively, "Service Providers"). Our Service Providers may have access to personal information, depending on each of their specific roles and purposes in facilitating and enhancing our Services, and may only use the data as determined in our agreements with them. In such instances, our Service Providers processing such data will assume the role of "data sub-processor";
- iSpring may share and disclose your Personal Data to authorized resellers, partners involved in delivering the Services, so that they can provide timely, helpful information about iSpring Services. iSpring resellers and partners are contractually obligated to abide by iSpring privacy policy, preventing them from sharing your information with any other third parties. You can find more information regarding iSpring authorized resellers and partners here <https://www.ispringsolutions.com/resellers>;

- You may choose to use a third-party service to integrate with our Services, for example in order to upload or retrieve Personal Data to or from the Services, or to enrich the data you have processed on either service or enhance your usage thereof (provided that such integration is supported by our Services). The provider of this integrated third-party service may receive certain relevant data about or from your account on the Services, or share certain relevant data from your account on the third-party provider's service with our Services, depending on the nature and purpose of such integration. This could include your Customer Data and/or User Data;
- iSpring may share Personal Data internally within iSpring Companies, for the purposes described in this Privacy Policy. In addition, should iSpring Companies or any of its subsidiaries or affiliates undergo any change in control or ownership, including by means of merger, acquisition or purchase of substantially all or part of its assets, Personal Data may be shared with or transferred to the parties involved in such an event. iSpring may disclose personal data to a third-party during negotiation of, in connection with or as an asset in such a corporate business transaction. Personal data may also be disclosed in the event of insolvency, bankruptcy or receivership;
- An iSpring customer, if you notify iSpring that this customer's use of iSpring Services violates the acceptable terms of use of iSpring Services or applicable law;
- A third party that has claimed that your use of the iSpring Services violates the acceptable use of iSpring Services or applicable law (to the extent such sharing is required by law);
- Should iSpring sell, merge or transfer any part of iSpring business, part of that sale may include your Personal Data. In the event of a corporate sale, merger, reorganization, dissolution or similar event, Personal Data may be part of the transferred assets;
- In certain situations, iSpring may be required to disclose Personal Data in response to lawful requests by law enforcement agencies, regulatory organizations, courts or public authorities to the extent required by law, including to meet national security or law enforcement requirements.

### **iSpring in its role as data processor**

iSpring is the "data processor" of User Data, which we process on behalf of our Customer (who is the "data controller" of such data; and our Service Providers who process such User Data on our behalf are the "sub-processors" of such data.

iSpring is both a "data controller" and "data processor" of Customer Data. Such data is processed by iSpring for its own purposes (as described above), as an independent 'controller'; whilst those certain portions of it which are included in User Data will be processed by us on our Customer's behalf, as a 'data processor'.

Accordingly, iSpring processes User Data strictly in accordance with our Customer's reasonable instructions and as further stipulated in our Data Processing Agreement and other commercial agreements with such Customer.

***Personal information and content you provide through iSpring web-based services.*** iSpring Customers are solely responsible for determining whether and how they wish to use our Services, and for ensuring that all individuals using the Services on the Customer's behalf or at their

request, as well as all individuals whose personal data may be included in Customer Data processed through the Services, have been provided with adequate notice and given informed consent to the processing of their personal data, where such consent is necessary or advised, and that all legal requirements applicable to the collection, recording, use or other processing of data through our Services are fully met by the Customer, including specifically in the context of an employment relationship. When Customers and iSpring partners use iSpring web-based services to process Personal Data in their content, iSpring acts as a data processor. The Customer of iSpring that owns an account in iSpring web-based services will be responsible for determining the purposes and means of the processing of the content and any Personal Data provided by Users of the account, and this iSpring Customer (or its end users) will be the data controller in regards to such processing.

***Personal information and content you provide using YouTube API and the Zoom Apps features and functionality.*** When customers and iSpring partners use YouTube API and the Zoom App integrated into iSpring Web-based services to process Personal Data in their content, iSpring acts as a data processor. The customer of iSpring that owns an account in iSpring web-based services will be responsible for determining the purposes and means of the processing of the content and any Personal Data provided by end-users using YouTube API and the Zoom Apps, and this iSpring customer (or its end users) will be the data controller in regards to such processing. The owner of an account in iSpring web-based services has the right to update the email address associated with his account or deactivate an account by submitting a written request to [support@ispring.com](mailto:support@ispring.com).

If at any time iSpring has access to Personal Data stored in the account owned by an iSpring customer, then iSpring shall be a data sub-processor, and any actions performed by iSpring in relation to such data shall be solely governed by the agreement concluded between us and the iSpring customer.

### **Legal ground for processing**

If you are an individual located in the European Economic Area (EEA), the European Union (EU), Switzerland or the United Kingdom, we collect and process information about you only where we have legal grounds for doing so under applicable EU laws. The legal ground depends on the Services you use and how you use them. To process your information as described above, we rely on the following legal bases:

- ***Performance of a contract:*** the use of your information is necessary to provide you the Services, customer support, and personalized features. If you order and use our Services, we will use your information to carry out our obligation to complete and administer that Services under the contract that we have with you;
- ***Legitimate interests:*** the processing is necessary for the purposes of the legitimate interests pursued by us, namely for information security. We also want to provide you with the best suitable content of the website, to improve and promote our products and

services and the content on our website, and for administrative, fraud detection and legal purposes;

- **Consent:** we may rely on your consent to use your Personal Data for specific purposes, for example, for sending newsletters and for certain direct marketing purposes.

### **How we store and secure information we collect**

**Information storage.** We use data hosting service providers in the United States, Ireland and Germany to host the information we collect, and we use technical measures to secure your data.

**Technical and organizational security procedures and data transfers.** We observe reasonable procedures to prevent unauthorized access to and the misuse of your Personal Data. We use appropriate business systems and procedures to protect and safeguard your Personal Data. We also use security procedures and technical and physical restrictions for accessing and using the Personal Data on our servers. Only authorized personnel are permitted to access Personal Data in the course of their work.

For more information on where we store your information and our security measures, please contact us as provided in the Contact Us section below.

### **How long we keep information (retention procedures)**

iSpring will store your personal information for as long as reasonably necessary in order to maintain and expand our relationship and provide you with our Services and offerings; in order to comply with our legal and contractual obligations; or to protect ourselves from any potential disputes (i.e. as required by laws applicable to log-keeping, records and bookkeeping, and in order to have proof and evidence concerning our relationship, should any legal issues arise following your discontinuance of use), all in accordance with our data retention policy and this Policy. After such time, we will either delete or anonymize your information or, if this is not possible (for example, because the information has been stored in backup archives), then we will securely store your information and isolate it from any further use until deletion is possible.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and the applicable legal requirements.

If you have any questions about our data retention policy, please contact us by e-mail at [support@ispring.com](mailto:support@ispring.com).

**Site account information:** We retain your site account information for as long as your site account is active and a reasonable period thereafter in case you decide to re-activate the Services. We also retain some of your information as necessary to comply with our legal obligations, to resolve disputes, to enforce our agreements, to support business operations, and to continue to develop and improve our Services. Where we retain information for Service

improvement and development, we take steps to eliminate information that directly identifies you, and we only use the information to uncover collective insights about the use of our Services, not to specifically analyze personal characteristics about you.

**Information you share on the Services:** If your site account is deactivated or disabled, some of your information and the content you have provided will remain in order to allow your team members or other users to make full use of the Services. For example, we continue to display messages you sent to the users that received them and continue to display the content you provided.

**Managed accounts:** If the Services are made available to you through an organization (e.g., your employer), we retain your information as long as required by the administrator of your account.

**Marketing information:** If you have elected to receive marketing emails from us, we retain information about your marketing preferences for a reasonable period of time from the date you last expressed interest in our Services, such as when you last opened an email from us or ceased using your iSpring site account. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created.

**Information you provide using the Zoom Apps features and functionality.** During integration with the Zoom App, iSpring retains the following information:

- Zoom access keys
- Zoom event IDs
- at the end of an event, we request statistics on users who have attended the event.

When the integration with the Zoom Apps is disabled, iSpring does not delete the event attendance statistics (except access keys and event identifiers) that is associated with users in iSpring web services, and could have been modified by iSpring system administrator. iSpring retains these statistics to ensure the integrity of Your account within iSpring web services. You can delete these data using iSpring web services administrator panel.

iSpring Web Services do not require an email address for registration for a webinar when You use the Zoom Webinar App. For Your convenience, iSpring transmits a special pregenerated email address to the Zoom Webinar App when you register for an event, which acts as a substitute for your real email address. Thus, connecting the integration through iSpring Web Services does not require Your (or end users') email addresses, and iSpring also does not transfer Your email addresses to third parties.

### **How you can access and control your information**

Subject to some limits, you have certain rights regarding your Personal Data and the processing thereof. PLEASE NOTE THAT OUR CUSTOMERS CONTROL AND MAINTAIN ACCESS TO THEIR DATA THAT IS STORED BY

ISPRING, AND WE MAY NOT HAVE ACCESS TO THE DATA MAINTAINED BY OUR CUSTOMERS OR EVEN KNOW WHAT DATA IS BEING MAINTAINED.

You have the right to request a copy of your information, to object to our use of your information (including for marketing purposes), to request the deletion or restriction of your information, or to request your information in a structured, electronic format. If you are an end-user and the Services are administered for you by an administrator (see section "Notice to End Users" below), you may need to contact your administrator to assist with your requests first. For all other requests, you may contact us as provided in the Contact Us section below to request assistance.

**Your rights:**

- You can access and update your information in your site account at any time;
- You can deactivate your site account if you no longer wish to use our Services;
- You can request the information iSpring has collected about you;
- You can request that we make changes to the Personal Data you have seen, but cannot change in your site account;
- You also have the right to obtain from us the erasure of your Personal Data (right to be forgotten);
- In addition, you may, under certain circumstances, have the right to restriction of the processing of your Personal Data;
- You have the right to object, on grounds relating to your particular situation, at any time to processing of your Personal Data;
- You have the right to receive your Personal Data, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller when the processing is based on your consent or is necessary for the performance of a contract (the right to data portability);
- You can opt-out of promotional communications from us by using the unsubscribe link within each email, updating your email preferences within your site account settings menu, or by contacting us as provided below to have your contact information removed from our promotional email list or registration database. Even after you opt-out of receiving promotional messages from us, you will continue to receive transactional messages from us regarding our Services. You can opt-out of some notification messages in your site account settings;
- You can opt out of our use of cookies: relevant browser-based cookie controls are described in our [Cookie Policy](#).
- You can manage cookies and similar technologies on the Sites by clicking the button "Manage your cookies" and making a choice.

iSpring acknowledges that you have the right to access the personal information that we maintain about you. If you seek access, or seek to correct, amend, or delete inaccurate data, you should direct your query to [support@ispring.com](mailto:support@ispring.com). If requested to remove data, we will respond within a reasonable timeframe.

**Consent and withdrawal of consent.** You are entitled to withdraw your consent at any time by giving us notice. Upon receipt of a notice where your consent is withdrawn, we will without undue delay stop processing your Personal Data to the extent it is required under the law. Please use the contact information at the bottom of the page should you wish to withdraw your consent given under this privacy statement. To limit the use and disclosure of your personal information, please submit a written request to [support@ispring.com](mailto:support@ispring.com).

### **United States - California residents**

This section provides additional details about the personal information iSpring collects about California customers as well as the rights of California consumers under the California Consumer Privacy Act (CCPA).

**How iSpring Collects, Uses, and Discloses your Personal Data.** The section “What information iSpring may collect about you in our role as data controller” describes in detail the Personal Data iSpring may have collected over the last 12 months, including identification information, internet activity information. iSpring have collected such Personal Data directly from you and from your interaction with the site and the Services.

iSpring collects this information for the purposes described in the “What information iSpring may collect about you in our role as data controller” and “Why iSpring processes your personal information in our role as data controller” sections. iSpring shares this information with the categories of third parties described in the “How we share your personal information in our role as data controller” and “Information we receive from third-party integrations” sections. iSpring uses cookies, as described in iSpring Cookie Policy available at [https://www.ispringsolutions.com/legal/cookie\\_policy](https://www.ispringsolutions.com/legal/cookie_policy). iSpring does not sell (as defined by the CCPA) your Personal Data.

**Your CCPA Rights and Choices.** As a California customer and subject to certain limitations under the CCPA, you have choices regarding our use and disclosure of your personal information:

- Exercising the right to know. You may request, up to twice in a 12-month period, the following information about the personal information we have collected about you during the past 12 months:
  - the categories and specific pieces of personal information we have collected about you;
  - the categories of sources from which we collected the personal information;
  - the business or commercial purpose for which we collected the personal information;
  - the categories of third parties with whom we shared the personal information; and
  - the categories of personal information about you that we disclosed for a business purpose, and the categories of third parties to whom we disclosed that information for a business purpose.
- Exercising the right to delete. You may request that we delete the personal information we have collected from you, subject to certain limitations under applicable law.

- Opt out of sales. California residents have the right to instruct businesses that sell their personal information to stop doing so. iSpring, however, does not sell your personal information.
- Non-discrimination. The CCPA provides that you may not be discriminated against for exercising these rights.

### ***How to exercise your privacy rights under the CCPA***

To exercise your rights under the CCPA, please submit a written request to [support@ispring.com](mailto:support@ispring.com), please indicate which right your request is for and provide a description to help us understand the nature of your request. Your authorized agent may submit requests in the same manner.

In order to fulfill requests for any rights exercise, iSpring is required to verify your identity so please be aware that iSpring may need to request additional information that will be used for that purpose.

### ***Notice to End Users***

Our web-based services are intended for use by organizations. Where the web-based services are made available to you through an organization (e.g., your employer), that organization is the administrator of the web-based services and is responsible for the accounts in web-based services over which it has control. If this is the case, please direct your data privacy questions to your administrator, as your use of the web-based services is subject to that organization's policies. We are not responsible for the privacy or security practices of an administrator's organization, which may be different than this policy.

#### *Administrators are able to:*

- reset your account password;
- restrict, suspend or terminate your access to the web-based services;
- access information in and about your account;
- access or retain information stored as part of your account;
- install or uninstall third-party apps or other integrations.

#### *In some cases, administrators can also:*

- restrict, suspend or terminate your account access;
- change the email address associated with your account;
- change your information, including profile information;
- restrict your ability to edit, restrict, modify, or delete information.

The administrator of the account in web-based services will assert administrative control over your account and use of the web-based services.

You will be able to change the email address associated with your account only upon the administrator's approval.

Please contact your organization or refer to your administrator's organizational policies for more information.

## **Our policy towards children**

The Services are not directed to individuals under age of 16. We do not knowingly collect personal information from children under age of 16. If we become aware that a child under age of 16 has provided us with personal information, we will take steps to delete such information. If you become aware that a child has provided us with personal information, please contact our support services.

## **Changes to this Policy**

We may change this Policy from time to time. We will post any privacy policy changes on this page and, if the changes are significant, we will provide more prominent notice by adding a notice on the Services homepages, login screens, or by sending you an email notification. We will also keep prior versions of this Policy in an archive for your review. We encourage you to review our privacy policy whenever you use the Services to stay informed about our information practices and the ways you can help protect your privacy.

If you disagree with any changes to this privacy policy, you will need to stop using the Services and deactivate your account(s), as outlined above.

## **Contact Us**

If you have any questions regarding this privacy policy or our processing of personal data, or want to contact us regarding your personal data, please contact [dpo@ispring.com](mailto:dpo@ispring.com).