

Zorroa Privacy Policy

Last modified: June 26, 2019

Introduction

We respect your privacy and are committed to protecting it through our compliance with this Policy. This Policy describes the types of information we may collect from you or that you may provide when you visit our website <https://zorroa.com> (our "Website") or when you use our business intelligence software (our "Software"), and our practices for collecting, using, maintaining, protecting and disclosing that information. We refer to our Website and our Software cumulatively as our "Services."

This Policy applies to any information that we collect through our Services, including any information in any emails, posts, texts and other electronic messages between you and our Services and any information about you transferred to our Services from other websites or sources. This Policy also applies to any related information that we collect about you offline but that will be processed by automated means using our Services. This Policy does not apply to any other information that we collect by any means.

Acceptance

*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, you can choose not to use our Services. **By accessing or using our Services, you agree to this Policy. This Policy may change from time to time. Your continued use of the Services after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.***

Personal Information We Collect and How We Collect It

We may collect several types of information from and about users of our Services, including information by which you may be personally identified, such as your name, email address, telephone number and IP address information. All of this information is cumulatively referred to in this Policy as "Personal Information." The Personal Information we collect on or through our Services includes:

- From the Website (e.g., when you fill out the "contact us" form or "demo request" form on the Website):
 - Name
 - Email
 - Company
 - IP address information or Mobile Device ID

- From the Software (e.g., when you create an account to log-in to the Software):
 - Name
 - Email
 - IP address information or Mobile Device ID

We will also retain records and copies of your correspondence (including email address), if you contact us through our Website or to request support services in connection with your use of the Software.

Legal Basis for Processing

We have the legal right to use your Personal Information in the ways described in this Policy based on your consent, or on the need to use the Personal Information to provide you with goods or services that you request, or for the legitimate purposes of furthering our existing relationship with you or preventing fraud. Accordingly, you have a contractual rather than a statutory obligation to provide such information. If you do not provide such information, you may be unable to use our Services and we may be unable to provide any goods or services that you request.

How We Use Your Personal Information

We use Personal Information that we collect about you or that you provide to us:

- To present our Services and their contents to you.
- To provide you with information, products or services that you request from us.
- To notify you about changes to our Services or any products or services we offer or provide through it.
- To provide you with marketing and promotional information about our own products and services that we offer to our customers.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- In any other way that we describe when you provide the information, to fulfill any other purpose for which you provide the information, and for any other purpose with your consent.

We retain your Personal Information while you are using our Services to improve your use of our Services. Once you are no longer using our Services, we will store your Personal Information for so long as we may need it to answer questions about the products or services that we provided, or to comply with the recordkeeping requirements of applicable law.

Disclosure of Your Personal Information

We do not share, sell or lease your Personal Information to any third parties, and we only permit use of your Personal Information internally by company personnel and our contractors/service providers, except in the following, limited circumstances:

- We may disclose Personal Information to our affiliates and to any contractors, service providers and other third parties who need to know such information to support our permitted uses of Personal Information as described in this Policy. These include an independent marketing firm and an independent security firm. If you are an E.U. or Swiss resident, please note that in the cases of onward transfer of your E.U. Personal Information (as defined below) to our affiliates, contractors and service providers, we will remain liable under the Principles of the E.U.-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework if our agent processes such E.U. Personal Information in a manner inconsistent with the Principles, unless we prove that we are not responsible for the event giving rise to the damage. For more information about the E.U.-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework, please see the Section below titled "Users Outside of the United States."
- We may disclose Personal Information in the limited circumstances described below in the section titled "Social Media Sites and Widgets."
- We may disclose Personal Information to a buyer or other successor to our business in the event of a sale of equity or assets, reorganization, merger or a similar corporate transaction, and any due diligence review with respect to any such proposed transaction.

- We may disclose Personal Information to comply with any court order, law or legal process, including to meet national security and law enforcement requirements and to respond to any government or regulatory request or audit, and to enforce or apply our License Agreement, including for billing and collection purposes, or if we believe disclosure is necessary or appropriate to protect the rights, property or safety of our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.
- We may also disclose your Personal Information for any purpose disclosed when the information is provided, and for any other purpose with your consent.

Automatic Collection and Use of Traffic and Usage Data; Use of Cookies

As you navigate through and interact with our Services, we may automatically collect certain traffic data and usage information to help us manage our content, improve your use of our Services and tailor our marketing messages that promote our own products and services to you. This may include information about your equipment, your IP address or Mobile Device ID, the general geographic region from which you are accessing our Services, operating system, browser information, configuration data, clickstream analytics, and your browsing actions and patterns when you use our Services, including the referring and exit pages on our Website.

Some of the information that we collect from cookies, web beacons or other embedded code relates to your personal use of our Services and allows us to store information about your preferences, speed up your searches and recognize you when you return to our Services. Other information that we collect from cookies, web beacons or other embedded code is not tied to your Personal Information and enables us to estimate our audience size and usage patterns.

The technologies that we use for this automatic data collection may include cookies that are stored on your computer, small embedded electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) and other types of embedded code on the Services that permit us to count users and obtain other related Services-related statistics (for example, recording the popularity of certain content and verifying system and server integrity).

Use of Google Analytics

We use Google Analytics to improve the content on our Services. You can obtain more information on how Google Analytics collects and processes data by visiting Google's webpage "How Google uses data when you use our partners' sites or apps," available online at www.google.com/policies/privacy/partners/.

Use and Disclosure of Pseudonymized, De-Identified or Aggregated Information

We may pseudonymize some of your information so that it can no longer be attributed to you without the use of other separately maintained information, or convert or combine some of your Personal Information into de-identified or aggregated data that does not disclose any of the Personal Information of any individual user. We may use and disclose any such pseudonymized, de-identified or aggregated data (including pseudonymized, de-identified or aggregated traffic and usage data relating to our Services) for any lawful purpose without restriction.

Social Media Sites and Widgets

You may be able to use social media widgets such as the Facebook "Like" button on our Website. These

widgets will collect your IP address and identify which page you are visiting on the Website and make your preference information available to third parties. The information collected by such widgets is controlled by third-party privacy policies.

Tracking and “DO NOT TRACK”

Tracking involves the use of cookies, web beacons, or other embedded code or tracking technologies to collect, analyze and store information on a user’s behavior over time on multiple sites, including information on the sites visited, products viewed, products purchased and other online interactions. Tracking information can be used to enable companies to make interest- based (behavioral) advertising available to users on multiple sites that they visit.

We do not currently collect Personal Information about your online activities over time and across third-party sites for tracking purposes. We do not currently allow third parties to collect Personal Information on our Services that could be used by them to analyze and store information about your online activities over time and across third-party sites for tracking purposes. Therefore, our Services do not respond to any “DO NOT TRACK” signals sent by your computer, browser or mobile device, and if your computer, browser or mobile device sends a “DO NOT TRACK” signal to our Services, our Services will not treat you differently from users who do not send such signals.

Choices About How We Use and Disclose Your Information

You have certain choices regarding the Personal Information you provide to us. You can set your browser to refuse all or some browser cookies. If you disable or refuse cookies, some parts of our Services may then be inaccessible or not function properly.

If you do not wish for us to notify you about special promotional offers related to our Services, you can opt-out by simply clicking on the “Unsubscribe” or “Updating your e-mail preferences,” link in the most recent e-mail you received from us and follow the prompts that appear. This opt out does not apply to information provided to you by e-mail as a result of a support services request initiated by you.

Users Outside of the United States

Our Services are hosted in the United States and are provided from the United States. It is possible that certain information will be stored on servers in multiple other countries on the “cloud” or other similar distributed hosting platforms. If you are a resident of any country other than the United States, please note that by providing your Personal Information to us, you are consenting to the transfer of your Personal Information to the United States and other jurisdictions as indicated above, and to our use and disclosure of your Personal Information in accordance with this Policy.

Privacy Shield Certification

If you are a resident of the European Union, please note that the E.U. has determined that the laws of the United States do not provide adequate protection for your Personal Information. Accordingly, we are transferring your Personal Information from the E.U. to the United States under the terms of our certification with the U.S. Department of Commerce under the E.U.-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework (“Privacy Shield”).

We comply with the Privacy Shield Principles regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland (“E.U. Personal Information”) to the United States, and we follow internal procedures for verifying that our commitments under this Policy have been implemented. We have certified to the U.S. Department of Commerce that we adhere to the

Privacy Shield Principles. If there is any conflict between the terms in this 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, please visit <https://www.privacyshield.gov/>. Our compliance with this obligation can be investigated and enforced by the United States Federal Trade Commission.

Visit <https://www.privacyshield.gov/participant?id=a2zt00000004ovdAAA> to view our Privacy Shield status.

Complaints

In compliance with the Privacy Shield Principles, we commit to resolve complaints about our collection or use of your E.U. Personal Information. E.U. and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact us directly at hello@zorroa.com.

We have further committed to refer unresolved Privacy Shield complaints to JAMS Privacy Shield Program, an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please visit <https://www.jamsadr.com/file-an-eu-us-privacy-shield-claim> for more information or to file a complaint. The services of this alternative dispute resolution provider are provided at no cost to you.

If you are an E.U. or Swiss resident and you still are not satisfied, you may have the right, under certain conditions, to invoke binding arbitration. Alternatively, you will have the right to lodge a complaint with the supervisory authority in your country of residence in the E.U. or Switzerland. You can find more information on your enforcement rights at <https://www.privacyshield.gov>.

Your European Union Privacy Rights

If you are a resident of the European Union, you will have the following additional rights with respect to E.U. Personal Information:

- If we intend to disclose your E.U. Personal Information to any third party that will have the right to process your E.U. Personal Information, we will enter into a contract with that third party that provides that your E.U. Personal Information may be processed only for limited and specified purposes consistent with the consent that you have provided to us, and that the third party must provide the same level of protection for your E.U. Personal Information that we are obligated to provide under this Policy while it is processing your E.U. Personal Information. In addition, we will notify you if that third party will have the right to determine the purposes for which it will process your E.U. Personal Information and the means it will use to process your E.U. Personal Information (rather than just providing requested assistance to us in support of our permitted uses of your E.U. Personal Information).
- If your E.U. Personal Information is being processed by automated means, you have the right to obtain a copy of your provided E.U. Personal Information, together with certain additional Personal Information that we have generated as a result of your use of our services, in a structured and commonly used and machine-readable format, and to transfer such Personal Information to another service provider. Upon your request, we will transfer that Personal Information directly to another service provider if it is feasible for us to do so.
- If we are processing your E.U. Personal Information based on your consent, you may withdraw that consent at any time.

- You may restrict our use of your E.U. Personal Information, by sending us an email stating your request to hello@zorroa.com, if you have contested the accuracy of that information, or if the processing is unlawful or you need the information to establish, exercise or defend a legal claim. We will then store your E.U. Personal Information and process it only with your consent, or to establish, exercise or defend a legal claim or to protect the rights of others. The restriction with respect to information claimed to be inaccurate would end if we verify the accuracy of that contested information.
- We do not collect, store or process sensitive information related to your racial or ethnic identity, political opinions, religious or philosophical beliefs, trade union membership, health (including genetic and biometric data), sex life or sexual (“E.U. Sensitive Information”). We will not use or disclose any of your E.U. Sensitive Information without your explicit consent, subject to certain limited exceptions. Should we wish to make any such use or disclosure, we will notify you by email and request that you authorize such use or disclosure by responding to the email with your explicit consent.
- We may create a profile to analyze or predict your personal preferences or interests solely related to your use of our Services and for the purposes described in this Policy. We do not otherwise create profiles to analyze or predict your performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements. We do not make any decision about you that would have legal consequences or similarly significant affects for you based solely on automated decision-making, including the use of profiles.
- Upon our receipt of your request by email at hello@zorroa.com and our verification of your identity, we will advise you whether or not we are processing E.U. Personal Information concerning you and, if so, will provide you with a copy of your E.U. Personal Information being processed and certain information about the nature and purposes of the processing. If your E.U. Personal Information is used for automated decision-making, we will provide you with summary information on the logic being used and the types of decisions being made. You may correct any such E.U. Personal Information that is inaccurate or incomplete.
- Upon your request, we will erase any of your E.U. Personal Information that is no longer needed for the purpose for which it was collected, or that is being used for direct marketing purposes, or if our use is based on your consent and you withdraw that consent.
- If we are using your E.U. Personal Information on the basis of your consent, and we change our Policy to permit any use or disclosure of your E.U. Personal Information that is materially different than the uses for which it was originally collected or subsequently authorized by you, we will obtain your consent before we make such further uses of your E.U. Personal Information.

Your California Privacy Rights

If you are a California resident, you may obtain certain information regarding our disclosure of your Personal Information to third parties for their direct marketing purposes. To make such a request, please send an email to hello@zorroa.com. However, please note that we do not currently disclose any of your Personal Information to third parties for their direct marketing purposes.

Accessing and Correcting Your Information

You may send us an email at hello@zorroa.com to request the right to view any of your Personal Information that we store and use, and to correct, amend or delete any such Personal Information that is inaccurate. Unless you have provided E.U. Personal Information, which is covered by the section above titled “Users Outside of the United States,” we will evaluate requests on a case-by-case basis.

We may not be able to delete your Personal Information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

Children

Our Services are not intended for children under 16 years of age, and no one under age 16 may provide any information to our Services. We do not knowingly collect personal information from children under the age of 16. If you are under age 16, do not use or provide any information on our Services, make any purchases through our Services, use any of the interactive or public comment features of our Services, or provide any information about yourself to us, including your name, address, telephone number, email address, IP address or Mobile Device ID, or any screen name or username you may use. If we learn we have collected or received personal information from a child under age of 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under age 16, please contact us at hello@zorroa.com.

Data Security

We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration and disclosure. All information that you provide to us is stored on our servers behind firewalls, and certain Personal Information will be encrypted using secure socket layer (SSL) technology.

Our Website is scanned for potential malware and vulnerabilities by Sucuri's SiteCheck. We do not send Personal Information to Sucuri. For more details, please see Sucuri's privacy policy. These security logs are retained for 14 days.

Additionally, our Website is part of a network of sites that protect against distributed brute force attacks. To enable this protection, the IP address of visitors attempting to log into the Website is shared with a service provided by ithemes.com. For privacy policy details, please see the iThemes Privacy Policy.

The safety and security of your information also depends on you. When we have given you (or when you have chosen) a password for access to certain parts of our Services, you are responsible for keeping that password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information over the Internet is not completely secure. Although we have implemented security measures that we think are adequate, we cannot guarantee the security of your Personal Information transmitted to our Services. Any transmission of Personal Information is at your own risk. We are not responsible for the circumvention of any security measures contained on our Services.

Changes to Our Privacy Policy

We post any changes we make to our Policy on this page. If we make material changes to how we treat our users' Personal Information, we will endeavor to notify you through a conspicuous notice posted on our Services.

The date this Policy was last revised is identified at the top of the page. You are responsible for periodically visiting our Services and this Policy to check for any changes.

If you have provided E.U. Personal Information, please see the section above titled “Users Outside of the United States” for more information about our additional obligations with respect to material changes to this Policy.

Contact Information

We are Zorroa Corp., a Delaware corporation with headquarters in San Francisco, California. To ask questions or comment about this Policy and our privacy practices, contact us at:

Zorroa Corp.

995 Market Street, Suite 808, San Francisco, CA 94103

By E-mail: privacy@zorroa.com

By Telephone: (510) 900-9201