

QUALISYSTEMS PRIVACY POLICY

Last Updated: October 21, 2018.

This privacy policy (“**Privacy Policy**”) governs how we QualiSystems Ltd. (“**QualiSystems**”, “**Quali**”, “**we**”, “**our**” or “**us**”) use, collect and store information pertaining to you (“**User**”, “**you**”), such as in the following use cases:

- (i) When you browse or visit our website, www.quali.com (“**Website**”)
- (ii) When you make use of, or interact with, our Website
 - a. When you schedule a demo
 - b. When you register to webinars
 - c. When you download SDK
 - d. When you download whitepapers, case studies, videos & Webinar recordings
 - e. When you apply and complete the survey online (or by card – offline-)
 - f. When you subscribe to our newsletters / emailing list
 - g. When you contact us (e.g. ask question regarding our solutions)
- (iii) When you create an account and make use of, or interact with Quali services:
 - a. Quali support – <https://support.quali.com/>
 - b. Quali university – <https://courses.quali.com/>
 - c. Quali community – <https://community.quali.com/>
- (iv) When you create an account and make use of, or interact with, CloudShell colony, www.cloudshellcolony.com
- (v) When you attend a marketing event and provide Personal Data
- (vi) When you exchange business cards with us (provided at events, road shows, conferences, referrals or other face to face communication);
- (vii) When we acquire your Personal Data from third-party sources (such as lead-generation companies)
- (viii) When we use the Personal Data of our customers

We greatly respect your privacy, which is why we make every effort to provide a platform that would live up to the highest of user privacy standards. Please read this Privacy Policy carefully, so you can fully understand our practices in relation to Personal Data. “Personal Data” means any information that can be used, alone or together with other data, to uniquely identify any living human being. Please note that this is a master privacy policy and some of its provisions only apply to individuals in certain jurisdictions. For example, the legal basis in the table below is only relevant for GDPR-protected individuals.

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This Privacy Policy may be updated from time to time and therefore we ask you to check back periodically for the latest version of the Privacy Policy, as indicated below. If there will be any significant changes made to the use of your Personal Data in a manner different from that stated at the time of collection, we will notify you by posting a notice on our Website or by other means.

1. WHAT INFORMATION WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED

Data we collect	Why is the data collected and for what purposes?	Legal basis	Third party Services we are using with your data	Period of storage	Consequences of not providing the data
When you browse or visit our website					
Cookies and Log files Read more on our cookie policy	In order to provide our Site and present you with information that is customized for you and to allow you to share content from our website through your social networks In order to improve security, analyze failures, administer the Site, we log the site activity information.	The data subject has given consent to the processing of his or her personal data for one or more specific purposes. Legitimate interest (e.g. essential cookies)	3 rd party cookies such as: <ul style="list-style-type: none"> • HubSpot • Addthis • Google Analytics • Pantheon • CloudFlare 	This depends on the cookie in question. Some cookies (e.g. essential cookies) cannot be disabled. You may opt out of tracking by Google Analytics by clicking here . You may also control and delete these cookies through your browser settings. Log files retained for 60 days	Cannot collect and store certain cookies Website cannot be personalized Cannot use or access some parts of the website
When you make use of, or interact with our Website					
When you schedule a demo					
<ul style="list-style-type: none"> • Name • Email Address • Phone Number • Job Title • Company Name • Country • State/Region 	<ul style="list-style-type: none"> • Scheduling a demo 	Processing is necessary in order to take steps at the request of the data subject prior to entering into a contract; Legitimate interest (e.g. to provide a demo).	Third parties being used: <ul style="list-style-type: none"> • Salesforce • HubSpot 	Until we no longer need the information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws.	Cannot provide a demo
	<ul style="list-style-type: none"> • Send you marketing information on our Product 	Consent			Cannot send you marketing communications
When you register to webinars					

Data we collect	Why is the data collected and for what purposes?	Legal basis	Third party Services we are using with your data	Period of storage	Consequences of not providing the data
<ul style="list-style-type: none"> Name Email Address Phone Number Job Title Company Name Country State/Region Any other data you decide to provide/supply 	<ul style="list-style-type: none"> Sending access details of the webinars 	Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract Legitimate interest (e.g. to provide a webinars details).	Third parties being used: <ul style="list-style-type: none"> Salesforce HubSpot BrightTalk (US only) Go2Webinar (rest of the world) 	Until we no longer need the information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws.	Cannot send access details of the webinars
	<ul style="list-style-type: none"> Send you marketing information on future webinars 	Consent			Cannot send you marketing communications
When you download SDK					
<ul style="list-style-type: none"> Name Email Address Phone Number Job Title Company Name Country State/Region 	<ul style="list-style-type: none"> Downloading our SDK package Issuing an SDK license 	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. Consent	Third parties being used: <ul style="list-style-type: none"> Salesforce HubSpot 	Until we no longer need the information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws.	Cannot download our SDK package
	<ul style="list-style-type: none"> Send you marketing information on our Product 	Consent			Cannot send you marketing communications
When you download whitepapers, case studies, videos & Webinar recordings					
<ul style="list-style-type: none"> Name Email Address Phone Number Job Title Company Name Country State/Region 	<ul style="list-style-type: none"> Download certain assets from Quali's website 	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. Consent	Third parties being used: <ul style="list-style-type: none"> Salesforce HubSpot 	Until we no longer need the information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws.	Cannot download certain assets from Quali's website
	<ul style="list-style-type: none"> Send you marketing information on our Product and solutions 	Consent			Cannot send you marketing communications
When you apply and complete a survey online (or by card – offline-)					
<ul style="list-style-type: none"> Name Email Address Phone Number Job Title Company Name Country State/Region 	<ul style="list-style-type: none"> To process your answers 	Consent	Third parties being used: <ul style="list-style-type: none"> Survey monkey HubSpot 	Until we no longer need the information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws.	Cannot process your answers
	<ul style="list-style-type: none"> To contact you in case that you win the survey gift card 	Legitimate interest (e.g. to assess a candidate)			Cannot contact you if you win the survey gift card
<ul style="list-style-type: none"> Send you marketing information on our Product 	Consent	Cannot send you marketing communications			
When you subscribe to our newsletters / emailing list					
<ul style="list-style-type: none"> Email address 	<ul style="list-style-type: none"> Adding you to our mailing list Sending newsletters, marketing communications and other company updates 	The data subject has given consent to the processing of his or her personal data for one or more specific purposes. Legitimate interest (e.g. send you more information about QualiSystems)	Third parties being used: <ul style="list-style-type: none"> Salesforce HubSpot 	Until we no longer need the information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws.	Cannot add you to our mailing list Cannot send you marketing communications
When you contact us (e.g. ask question regarding our solutions)					
<ul style="list-style-type: none"> Name Email Address Phone Number Job Title Company Name Country State/Region 	<ul style="list-style-type: none"> Answering questions Replying to requests 	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. Legitimate interest (e.g. respond to a query sent by you)	Third parties being used: <ul style="list-style-type: none"> Salesforce HubSpot 	Until we no longer need the information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws.	Cannot contact us and we cannot assist/help you
	<ul style="list-style-type: none"> Send you marketing information on our Product and solutions 	Consent			Cannot send you marketing communications
When you create an account and make use of, or interact with Quali services					
<ul style="list-style-type: none"> Name Email Address Phone Number Job Title Company Name Country 	<ul style="list-style-type: none"> Creating an account Processing the order of the Service Performing/executing the service 	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. Legitimate interest (e.g. to fulfil the service)	Third parties being used: <ul style="list-style-type: none"> OKTA Zendesk AnswerHub MatrixLMS Salesforce HubSpot 	Until we no longer need the information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws.	Cannot create an account Cannot process the service order and perform the agreement

Data we collect	Why is the data collected and for what purposes?	Legal basis	Third party Services we are using with your data	Period of storage	Consequences of not providing the data
When you create an account and make use of, or interact with, CloudShell Colony					
When you create an account					
<ul style="list-style-type: none"> Name Email Address 	<ul style="list-style-type: none"> Creating an account Processing the order of the Service Performing/executing the service 	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.</p> <p>Legitimate interest (e.g. to fulfil the service)</p>	<p>Third parties being used:</p> <ul style="list-style-type: none"> Salesforce AWS 	<p>Until we no longer need the information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws.</p>	<p>Cannot create an account</p> <p>Cannot process the service order and perform the agreement</p>
When you browse or use Colony website					
<p>Cookies and log files</p> <p>Read more on our cookie policy</p>	<p>In order to provide our Service and present you with information that is customized for you and to allow us to improve our services</p> <p>In order to improve security, analyze failures, administer the Site, we log the site activity information.</p>	<p>The data subject has given consent to the processing of his or her personal data for one or more specific purposes.</p> <p>Legitimate interest (e.g. essential cookies)</p>	<p>3rd party cookies such as:</p> <ul style="list-style-type: none"> Amplitude Hotjar Google Analytics <p>Log files:</p> <ul style="list-style-type: none"> Logz.io CloudFlare 	<p>This depends on the cookie in question. Some cookies (e.g. essential cookies) cannot be disabled. You may opt out of tracking by Google Analytics by clicking here. You may also control and delete these cookies through your browser settings.</p>	<p>Cannot collect and store certain cookies</p> <p>Website cannot be personalized</p> <p>Cannot use or access some parts of the website</p>
When you attend a marketing event and provide Personal Data					
<ul style="list-style-type: none"> Name Email Address Phone Number Job Title Company Name Country State/Region Any other data you provide to us 	<ul style="list-style-type: none"> Establishing a business connection Sending newsletters, marketing communications and other company updates 	<p>The processing of personal data for direct marketing purposes may be regarded as carried out for a legitimate interest.</p> <p>Legitimate interest (certain b2b marketing communications)</p>	<p>Third parties being used:</p> <ul style="list-style-type: none"> Salesforce HubSpot 	<p>Until we no longer need the information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws.</p>	<p>Cannot send you marketing communications</p>
When you exchange business cards with us (provided at events, road shows, conferences, referrals or other face to face communication)					
<ul style="list-style-type: none"> Name Email Address Phone Number Job Title Company Name Country State/Region Any other data you provide to us 	<ul style="list-style-type: none"> Establishing a business connection Sending newsletters, marketing communications and other company updates 	<p>The processing of personal data for direct marketing purposes may be regarded as carried out for a legitimate interest.</p> <p>Legitimate interest (certain b2b marketing communications)</p>	<p>Third parties being used:</p> <ul style="list-style-type: none"> Salesforce HubSpot 	<p>Until we no longer need the information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws.</p>	<p>Cannot send you marketing communications</p>
When we acquire your Personal Data from third-party sources (such as lead-generation companies)					
<ul style="list-style-type: none"> Name Email Address Phone Number Job Title Company Name Country State/Region 	<ul style="list-style-type: none"> Establishing a business connection Sending newsletters or company and IoT related updates 	<p>The processing of personal data for direct marketing purposes may be regarded as carried out for a legitimate interest.</p>	<p>Third parties being used:</p> <ul style="list-style-type: none"> Salesforce HubSpot 	<p>Until we no longer need the information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws.</p>	<p>Cannot send you marketing communications</p>
When we use the Personal Data of our customers and Partners					
<ul style="list-style-type: none"> Name Email Address Phone Number Job Title Company Name Business address Country State/Region Any other data you decide to provide/supply 	<ul style="list-style-type: none"> Establishing a business connection Signing contracts Providing the product license 	<p>Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Legitimate interest (e.g. to provide product information, issue quotes etc.).</p>	<p>Third parties being used:</p> <ul style="list-style-type: none"> Salesforce HubSpot 	<p>Until we no longer need the information and proactively delete it or you send a valid deletion request. Please note that we may retain it for a longer or shorter period in accordance with data retention laws.</p>	<p>Cannot establish business relations</p>

2. HOW WE PROTECT AND STORE YOUR INFORMATION

- I. Security. We have implemented appropriate technical, organizational and security measures designed to reduce the risk of accidental destruction or loss, or the unauthorized disclosure or access to such information appropriate to the nature of the information concerned. However, please note that we cannot guarantee that the information will not be exposed as a result of unauthorized penetration to our servers. Nevertheless, we make commercially reasonable efforts to make the collection and security of such information consistent with this Privacy Policy and all applicable laws and regulations. As the security of information depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.
- II. Retention of your Personal Data. In addition to the retention periods mentioned in Section 1 above, in some circumstances we may store your Personal Data for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, or (iii) if we reasonably believe there is a prospect of litigation relating to your Personal Data or dealings.

3. HOW WE SHARE YOUR PERSONAL INFORMATION

In addition to the recipients described in Section 1, we may share your information as follows:

- To the extent necessary, with regulators, to comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order;
- If, in the future, we sell or transfer some or all of our business or assets to a third party, we will (to the minimum extent required) disclose information to a potential or actual third party purchaser of our business or assets. In the event that we are acquired by or merged with a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer or assign Personal Data in connection with the foregoing events;
- Where you have provided your consent to us sharing the Personal Data (e.g., where you provide us with marketing consents or opt-in to optional additional services or functionality); and
- Where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any Personal Data is disclosed.

4. ADDITIONAL INFORMATION REGARDING TRANSFERS OF PERSONAL INFORMATION

With respect to the access from Israel, please note that Israel was declared as a country offering adequate level of data protection by the European Commission. Please read more here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en

External transfers.

- Where we transfer your Personal Data outside of EU/EEA, for example to third parties who help provide our products and services, we will obtain contractual commitments from them to protect your Personal Data.
- Some of these assurances are well recognized certification schemes like the EU - US Privacy Shield for the protection of Personal Data transferred from within the EU to the United States; or
- Where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any Personal Data is disclosed.

5. YOUR RIGHTS

The following rights (which may be subject to certain exemptions or derogations), shall apply to certain individuals (some of which only apply to individuals protected by the GDPR):

- You have a right to access information held about you. Your right of access is normally exercised free of charge, however we reserve the right to charge an appropriate administrative fee where permitted by applicable law;
- You have the right to request that we amend any Personal Data we hold that it is inaccurate or misleading.
- You have the right to request the erasure of the Personal Data that relates to you. Please note that there may be circumstances in which we are required to retain your data, for example for the establishment, exercise or defense of legal claims;
- The right to object to or to request restriction of the processing. However, there may be circumstances in which we are legally entitled to refuse your request;
- The right to data portability. This means that you may have the right to receive your Personal Data in a structured, commonly used and machine-readable format, and that you have the right to transmit that data to another controller;
- You have the right to object to profiling;
- You have a right to lodge a complaint with your local data protection supervisory authority (i.e., your place of habitual residence, place of work or place of alleged infringement) at any time. We ask that you please attempt to resolve any issues with us before you contact your local supervisory authority
- The right to withdraw your consent. Please note that there may be circumstances in which we are entitled to continue processing your data, in particular if the processing is required to meet our legal and regulatory obligations.
- You also have a right to request details of the basis on which your Personal Data is transferred outside the European Economic Area, but you acknowledge that data transfer agreements may need to be partially redacted for reasons of commercial confidentiality.

You can exercise your rights by contacting us at privacy@quali.com. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly or inform you if we require further information in order to fulfil your request. When processing your request, we may ask you for additional information to confirm your identity and for security purposes, before disclosing the Personal Data requested to you. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initially requested, we will address your request to the maximum extent possible, all in accordance with applicable law.

6. USE BY CHILDREN

We do not offer our products or services for use by children. If you are under 18, you may not use the Website, or provide any information to the Website without involvement of a parent or a guardian. We do not knowingly collect information from, and/or about children.

7. LINKS TO AND INTERACTION WITH THIRD PARTY PRODUCTS

The Site may enable you to interact with or contain links to your Third Party Account and other third party websites, mobile software applications and services that are not owned or controlled by us (each a “**Third Party Service**”). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services may collect Personal Information from you. Accordingly, we encourage you to read the terms and conditions and privacy policy of each Third Party Service that you choose to use or interact with.

8. LOG FILES

We may make use of log files. The information inside the log files includes internet protocol (IP) addresses, type of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, clicked pages and any other information your browser may send to us. We may use such information to improve security, analyze failures and administer the Site.

9. COOKIES AND OTHER TRACKING TECHNOLOGIES

Our Site may utilize “cookies”, anonymous identifiers and other tracking technologies in order to for us to provide our Site and present you with information that is customized for you. A “cookie” is a small text file that may be used, for example, to collect information about activity on the Site. Certain cookies and other technologies may serve to recall Personal Information, such as an IP address, previously indicated by a user. Most browsers allow you to control cookies, including whether or not to accept them and how to remove them. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser.

10. ANALYTIC TOOLS

Our Web Site and/or CloudShell Colony web site may use Analytic tools to collect information about use of the Site. The tools we are using are:

- GOOGLE ANALYTICS
- AMPLITUDE
- HOTJAR

These tools collect information such as how often users visit this site, what pages they visit when they do so and how much time do they spend on each page. We use the information we get from these tools to maintain and improve the Sites and our products. We do not combine the information collected through the use of these tools with personally identifiable information.

Google’s ability to use and share information collected by Google Analytics about your visits to this Site is restricted by the Google Analytics Terms of Service, available at <http://www.google.com/analytics/terms/us.html/>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <http://www.google.com/policies/privacy/partners/>. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>.

For more information about Amplitude please check <https://amplitude.com/privacy>

For more information about Hotjar please check <https://www.hotjar.com/legal/policies/privacy>

11. CALIFORNIA PRIVACY RIGHTS

California Civil Code Section 1798.83 permits our customers who are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please send an email to privacy@quali.com. Please note that we are only required to respond to one request per customer each year.

12. OUR CALIFORNIA DO NOT TRACK NOTICE

We do not currently respond or take any action with respect to web browser “do not track” signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of personally identifiable information about an individual consumer’s online activities over time and across third-party web sites or online services. We may allow third parties, such as companies that provide us with analytics tools, to collect personally identifiable information about an individual consumer’s online activities over time and across different web sites when a consumer uses the Site.

13. DELETION OF CONTENT FROM CALIFORNIA RESIDENTS

If you are a California resident under the age of 18 and a registered user, California Business and Professions Code Section 22581 permits you to remove content or Personal Information you have publicly posted. If you wish to remove such content or Personal Information and you specify which content or Personal Information you wish to be removed, we will do so in accordance with applicable law. Please be aware that after removal you will not be able to restore removed content. In addition, such removal does not ensure complete or comprehensive removal of the content or Personal Information you have posted and that there may be circumstances in which the law does not require us to enable removal of content.

14. CONTACT US

If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us at privacy@quali.com.