

## QUALISYSTEMS PRIVACY POLICY

*Last Updated: July 10, 2019.*

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 websites, [www.quali.com](http://www.quali.com) (“**Website**”), [www.cloudshellcolony.com](http://www.cloudshellcolony.com) (“**CloudShell Colony 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 chat with us via the Website Bot](#)
  - d. [When you download SDK](#)
  - e. [When you download whitepapers, case studies, videos & Webinar recordings](#)
  - f. [When you apply and complete the survey online \(or by card or offline\)](#)
  - g. [When you subscribe to our newsletters / emailing list/ updates](#)
  - h. [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 as a user:](#)
  - Quali support – <https://support.quali.com/>
  - Quali university – <https://courses.quali.com/>
  - Quali community – <https://community.quali.com/>
- (iv) When you make use of, or interact with, **CloudShell Colony**, [www.cloudshellcolony.com](http://www.cloudshellcolony.com)
  - a. [When you create an account, log in and make use of the services](#)
  - b. [When you request a demo or a free trial](#)
  - c. [When you contact us \(e.g. when you want to start a trial or to receive information about our integrations\)](#)
  - d. [When you chat with us via the CloudShell Colony Bot](#)
- (v) When you make use of CloudShell Live <https://cloudshell.live> , <https://demo.quali.com>
  - a. [When you create an account, log in and make use of the services](#)
- (vi) When you make use of Cloudshell within your organization
  - a. [When you request Quali for support in the CloudShell Database or Logs for the purpose of failure detection](#)
- (vii) [When you attend a marketing event and provide Personal Data](#)
- (viii) [When you exchange business cards with us \(provided at events, road shows, conferences, referrals or other face to face communication\);](#)
- (ix) [When we acquire your Personal Data from third-party sources \(such as lead-generation companies\)](#)
- (x) [When we use the Personal Data of our service providers and suppliers](#)
- (xi) [When we use the Personal Data of our customers and partners](#)
- (xii) [When you interact with us on our social media profiles \(e.g., Facebook, Instagram, Twitter, LinkedIn\)](#)

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**” or “**personal information**” 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.

**Important note:** Nothing in this Privacy Policy is intended to limit in any way your statutory right, including your rights to a remedy or means of enforcement.

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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
<b>When you browse or visit our Website</b>					
<p>Cookies, analytic tools and Log files</p> <p>Read more on our <a href="#">cookie policy</a></p>	<p>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</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>3<sup>rd</sup> party cookies such as:</p> <ul style="list-style-type: none"> <li>• HubSpot (Marketing)</li> <li>• Addthis (bookmarking)</li> <li>• Google (Analytics)</li> <li>• HotJar (Analytics)</li> <li>• Amplitude (Analytics)</li> <li>• CloudFlare (WAF)</li> <li>• Pantheon (Hosting)</li> </ul>	<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 <a href="#">clicking here</a>. You may also control and delete these cookies through your browser settings.</p> <p>Log files retained for 60 days</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>
<b>When you make use of, or interact with, our Website</b>					
<b>When you schedule a demo</b>					
<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Email Address</li> <li>• Phone Number</li> <li>• Job Title</li> <li>• Company Name</li> <li>• Country</li> <li>• State/Region</li> </ul>	<ul style="list-style-type: none"> <li>• To schedule and provide a demo</li> <li>• To call you to coordinate the demo</li> </ul>	<p>Processing is necessary 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 a demo).</p>	<p>Third parties being used:</p> <ul style="list-style-type: none"> <li>• Salesforce (CRM)</li> <li>• HubSpot (Marketing)</li> </ul>	<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 provide a demo</p>
<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Email Address</li> </ul>	<ul style="list-style-type: none"> <li>• To send you marketing communications</li> </ul>	<p>Consent</p>		<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>
<b>When you register to webinars</b>					
<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Email Address</li> <li>• Phone Number</li> <li>• Job Title</li> <li>• Company Name</li> <li>• Country</li> <li>• State/Region</li> <li>• Any other data you decide to provide/supply</li> </ul>	<ul style="list-style-type: none"> <li>• To send you access details of the webinars</li> </ul>	<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 a webinars details).</p>	<p>Third parties being used:</p> <ul style="list-style-type: none"> <li>• Salesforce (CRM)</li> <li>• HubSpot (Marketing)</li> <li>• BrightTalk (webinar solutions – US only)</li> <li>• Go2Webinar (webinar solutions)</li> </ul>	<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 access details of the webinars</p>
<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Email Address</li> </ul>	<ul style="list-style-type: none"> <li>• To send you marketing communications</li> </ul>	<p>Consent</p>		<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>
<b>When you chat with us via the Website Bot</b>					
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email Address</li> <li>Any other information provided by you.</li> </ul>	<ul style="list-style-type: none"> <li>• To answer questions</li> <li>• To reply to requests</li> <li>• To provide you with information about our services</li> </ul>	<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. respond to a query sent by you)</p>	<p>Third parties being used:</p> <ul style="list-style-type: none"> <li>• Salesforce (CRM)</li> <li>• HubSpot (Marketing)</li> </ul>	<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 contact us</p> <p>Cannot assist/help you</p> <p>Cannot provide you with information about our services</p>
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email Address</li> </ul>	<ul style="list-style-type: none"> <li>• To send you marketing communications</li> </ul>	<p>Consent</p>		<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>

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
<b>When you download SDK</b>					
<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Email Address</li> <li>• Phone Number</li> <li>• Job Title</li> <li>• Company Name</li> <li>• Country</li> <li>• State/Region</li> </ul>	<ul style="list-style-type: none"> <li>• To download our SDK package</li> <li>• To issue an SDK license</li> </ul>	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 download the SDK).	Third parties being used: <ul style="list-style-type: none"> <li>• Salesforce (CRM)</li> <li>• HubSpot (Marketing)</li> </ul>	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  Cannot issue an SDK license
<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Email Address</li> </ul>	<ul style="list-style-type: none"> <li>• To send you marketing communications</li> </ul>	Consent		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 you marketing communications
<b>When you download whitepapers, case studies, videos &amp; Webinar recordings</b>					
<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Email Address</li> <li>• Phone Number</li> <li>• Job Title</li> <li>• Company Name</li> <li>• Country</li> <li>• State/Region</li> </ul>	<ul style="list-style-type: none"> <li>• To download certain assets from Quali's website</li> </ul>	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 download the whitepapers).	Third parties being used: <ul style="list-style-type: none"> <li>• Salesforce (CRM)</li> <li>• HubSpot (Marketing)</li> </ul>	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"> <li>• Full Name</li> <li>• Email Address</li> </ul>	<ul style="list-style-type: none"> <li>• To send you marketing communications</li> </ul>	Consent		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 you marketing communications
<b>When you apply and complete the survey online (or by card – offline-)</b>					
<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Email Address</li> <li>• Phone Number</li> <li>• Job Title</li> <li>• Company Name</li> <li>• Country</li> <li>• State/Region</li> </ul>	<ul style="list-style-type: none"> <li>• To process your answers</li> <li>• To contact you in case that you win the survey gift card or prize</li> </ul>	Consent  Legitimate interest (e.g. to assess a candidate)	Third parties being used: <ul style="list-style-type: none"> <li>• Survey monkey (Surveying)</li> <li>• HubSpot (Marketing)</li> <li>• Salesforce (CRM)</li> </ul>	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  Cannot contact you if you win the survey gift card or prize
<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Email Address</li> </ul>	<ul style="list-style-type: none"> <li>• To send you marketing communications</li> </ul>	Consent		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 you marketing communications
<b>When you subscribe to our newsletters / emailing list/ updates</b>					
<ul style="list-style-type: none"> <li>• Email address</li> </ul>	<ul style="list-style-type: none"> <li>• To add you to our mailing list</li> <li>• To send newsletters, marketing communications and other company updates</li> </ul>	Consent  Legitimate interest (e.g. send you more information about QualiSystems)	Third parties being used: <ul style="list-style-type: none"> <li>• Salesforce (CRM)</li> <li>• HubSpot (Marketing)</li> </ul>	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
<b>When you contact us (e.g. ask question regarding our solutions)</b>					
<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Email Address</li> <li>• Phone Number</li> <li>• Job Title</li> <li>• Company Name</li> <li>• Country</li> <li>• State/Region</li> <li>• Message</li> <li>• Any other information that you decide to provide/supply us</li> </ul>	<ul style="list-style-type: none"> <li>• To answer questions</li> <li>• To reply to requests</li> </ul>	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"> <li>• Salesforce (CRM)</li> <li>• HubSpot (Marketing)</li> </ul>	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  Cannot assist/help you
<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Email Address</li> </ul>	<ul style="list-style-type: none"> <li>• To send you marketing communications</li> </ul>	Consent		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 you marketing communications

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
<b>When you create an account and make use of, or interact with Quali services as a User</b>					
<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Email Address</li> <li>• Phone Number</li> <li>• Job Title</li> <li>• Company Name</li> <li>• Country</li> <li>• Role</li> <li>• User ID</li> <li>• Password</li> </ul>	<ul style="list-style-type: none"> <li>• To create an account</li> <li>• To provide the service</li> <li>• To perform the agreement</li> </ul>	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 fulfill the service)	Third parties being used: <ul style="list-style-type: none"> <li>• OKTA (user authentication)</li> <li>• Zendesk (Support)</li> <li>• AnswerHub (Community)</li> <li>• MatrixLMS (Training)</li> <li>• Salesforce (CRM)</li> <li>• HubSpot (Marketing)</li> </ul>	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 provide the services  Cannot perform the agreement
<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Email Address</li> </ul>	<ul style="list-style-type: none"> <li>• To send you marketing communications</li> </ul>	Consent		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 you marketing communications.
<b>When you make use of, or interact with, CloudShell Colony</b>					
<b>When you create an account, log in and make use of the services</b>					
<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Email Address</li> <li>• Phone Number</li> <li>• Job Title</li> <li>• Company Name</li> <li>• Country</li> <li>• Role</li> </ul>	<ul style="list-style-type: none"> <li>• To create an account</li> <li>• To provide the service</li> <li>• To perform the agreement</li> <li>• To provide a free trial</li> </ul>	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"> <li>• Salesforce (CRM)</li> <li>• AWS (cloud services)</li> <li>• HubSpot (Marketing)</li> <li>• OKTA (user authentication)</li> <li>• Zendesk (Support)</li> <li>• Logz.io (log management)</li> </ul>	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 provide the services  Cannot perform the agreement  To provide a free trial
<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Email Address</li> </ul>	<ul style="list-style-type: none"> <li>• To send you marketing communications</li> </ul>	Consent		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 you marketing communications
<b>When you request a demo or a free trial</b>					
<ul style="list-style-type: none"> <li>• Name</li> <li>• Last Name</li> <li>• Email Address</li> <li>• Phone Number</li> <li>• Job Title</li> <li>• Company Name</li> <li>• Country</li> <li>• Best time to contact you</li> </ul>	<ul style="list-style-type: none"> <li>• To schedule a demo or a free trials</li> </ul>	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"> <li>• Salesforce (CRM)</li> <li>• HubSpot (Marketing)</li> </ul>	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 or a free trial
<b>When you contact us (e.g. when you want to start a trial or to receive information about our integrations)</b>					
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email Address</li> <li>• Subject</li> <li>• Description</li> <li>• Attachments</li> <li>• Any other information provided by you.</li> </ul>	<ul style="list-style-type: none"> <li>• To answer questions</li> <li>• To reply to requests</li> </ul>	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"> <li>• Salesforce (CRM)</li> <li>• HubSpot (Marketing)</li> </ul>	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  Cannot assist/help you
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email Address</li> </ul>	<ul style="list-style-type: none"> <li>• To send you marketing communications</li> </ul>	Consent		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 you marketing communications
<b>When you chat with us via the CloudShell Colony Bot</b>					
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email Address</li> <li>• Any other information provided by you.</li> </ul>	<ul style="list-style-type: none"> <li>• To answer questions</li> <li>• To reply to requests</li> <li>• To provide you with information about our services</li> </ul>	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"> <li>• Salesforce (CRM)</li> <li>• HubSpot (Marketing)</li> <li>• Zendesk (Support)</li> </ul>	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  Cannot assist/help you  Cannot provide you with information about our services

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"> <li>Full name</li> <li>Email Address</li> </ul>	<ul style="list-style-type: none"> <li>To send you marketing communications</li> </ul>	Consent		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 you marketing communications
<b>When you make use of, or interact with, CloudShell Live</b>					
<b>When you create an account log in and make use of the services</b>					
<ul style="list-style-type: none"> <li>Full Name</li> <li>Email Address</li> <li>Phone Number</li> <li>Job Title</li> <li>Company Name</li> <li>Country</li> <li>Role</li> <li>Password</li> </ul>	<ul style="list-style-type: none"> <li>To create an account</li> <li>To provide the service</li> <li>To perform the agreement</li> </ul>	<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 fulfill the service)</p>	<p>Third parties being used:</p> <ul style="list-style-type: none"> <li>OKTA (user authentication)</li> <li>Salesforce (CRM)</li> <li>AWS (cloud services)</li> <li>Azure (cloud services)</li> </ul>	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.	<ul style="list-style-type: none"> <li>Cannot create an account</li> <li>Cannot provide the services</li> <li>Cannot perform the agreement</li> </ul>
<b>When you make use of Cloudshell within your organization</b>					
<b>When you request Quali for support in the CloudShell Database or Logs for the purpose of failure detection</b>					
<ul style="list-style-type: none"> <li>Email address</li> <li>List of users</li> <li>Any other data that you decide to provide/supply us</li> </ul>	<ul style="list-style-type: none"> <li>To perform the agreement</li> <li>To provide support</li> </ul>	<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 provide support)</p>	<p>Third parties being used:</p> <ul style="list-style-type: none"> <li>Zendesk (Support)</li> <li>Files.com/BrickFTP (cloud-based file transfer)</li> </ul>	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.	<ul style="list-style-type: none"> <li>Cannot perform the agreement</li> <li>Cannot provide support</li> </ul>
<b>When you attend a marketing event and provide Personal Data</b>					
<ul style="list-style-type: none"> <li>Name</li> <li>Email Address</li> <li>Phone Number</li> <li>Job Title</li> <li>Company Name</li> <li>Country</li> <li>State/Region</li> <li>Any other data you decide to provide/supply</li> </ul>	<ul style="list-style-type: none"> <li>To establish a business connection</li> <li>To send newsletters, marketing communications and other company updates</li> </ul>	<p>Consent</p> <p>Legitimate interest (certain b2b marketing communications)</p>	<p>Third parties being used:</p> <ul style="list-style-type: none"> <li>Salesforce (CRM)</li> <li>HubSpot (Marketing)</li> </ul>	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.	<ul style="list-style-type: none"> <li>Cannot establish a business connection</li> <li>Cannot send you marketing communications</li> </ul>
<b>When you exchange business cards with us (provided at events, road shows, conferences, referrals or other face to face communication)</b>					
<ul style="list-style-type: none"> <li>Name</li> <li>Email Address</li> <li>Phone Number</li> <li>Job Title</li> <li>Company Name</li> <li>Country</li> <li>State/Region</li> <li>Any other data you decide to provide/supply</li> </ul>	<ul style="list-style-type: none"> <li>To establish a business connection</li> <li>To send marketing communications</li> </ul>	<p>Consent</p> <p>Legitimate interest (certain b2b marketing communications)</p>	<p>Third parties being used:</p> <ul style="list-style-type: none"> <li>Salesforce (CRM)</li> <li>HubSpot (Marketing)</li> </ul>	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.	<ul style="list-style-type: none"> <li>Cannot establish a business connection</li> <li>Cannot send you marketing communications</li> </ul>
<b>When we acquire your Personal Data from third-party sources (such as lead-generation companies)</b>					
<ul style="list-style-type: none"> <li>Full Name</li> <li>Email Address</li> <li>Phone Number</li> <li>Job Title</li> <li>Company Name</li> <li>Country</li> <li>State/Region</li> </ul>	<ul style="list-style-type: none"> <li>To establish a business connection</li> <li>To send marketing communications</li> </ul>	Depending on the context, legitimate interest (B2B marketing), pre-contractual discussions or consent	<p>Third parties being used:</p> <ul style="list-style-type: none"> <li>Salesforce (CRM)</li> <li>HubSpot (Marketing)</li> <li>DiscoverOrg (Business contact database)</li> </ul>	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.	<ul style="list-style-type: none"> <li>Cannot establish a business connection</li> <li>Cannot send you marketing communications</li> </ul>
<b>When we use the Personal Data of our service providers and suppliers</b>					
<ul style="list-style-type: none"> <li>Full name</li> <li>Email address</li> <li>Company name</li> <li>Job position</li> <li>Phone number</li> <li>Any other data you decide to provide/supply</li> </ul>	<ul style="list-style-type: none"> <li>To contact our service providers</li> <li>To perform the applicable agreement</li> </ul>	<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. perform the contract, send contract-related communications)</p>	None	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.	<ul style="list-style-type: none"> <li>Cannot communicate with you</li> <li>Cannot perform the applicable agreement</li> </ul>
<b>When we use the Personal Data of our customers and partners</b>					
<ul style="list-style-type: none"> <li>Name</li> <li>Email Address</li> <li>Phone Number</li> <li>Job Title</li> <li>Company Name</li> <li>Business address</li> <li>Country</li> <li>State/Region</li> <li>Any other data you decide to provide/supply</li> </ul>	<ul style="list-style-type: none"> <li>To establish a business connection</li> <li>To perform the applicable agreement</li> <li>To provide the product license</li> </ul>	<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"> <li>Salesforce (CRM)</li> <li>HubSpot (Marketing)</li> <li>Strikedeck (Customer success)</li> <li>Zendesk (Support)</li> </ul>	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.	<ul style="list-style-type: none"> <li>Cannot establish business connection</li> <li>Cannot perform the applicable agreement</li> <li>Cannot provide the product license</li> </ul>

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
<b>When you interact with us on our social media profiles (e.g., Facebook, Instagram, Twitter, LinkedIn)</b>					
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Company name</li> <li>• Job position</li> <li>• Social media handle</li> <li>• Any other data you decide to provide/supply</li> </ul>	<ul style="list-style-type: none"> <li>• To reply and/or respond to your request or question</li> <li>• To establish a first business connection/discussion</li> </ul>	Depending on the context, legitimate interest (B2B marketing), pre-contractual discussions or consent	Third parties being used: <ul style="list-style-type: none"> <li>• Salesforce (CRM)</li> <li>• HubSpot (Marketing)</li> </ul>	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.	<ul style="list-style-type: none"> <li>• Cannot reply or respond to your request</li> <li>• Cannot establish a business connection</li> </ul>

Finally, please note that some of the abovementioned personal data will be used for fraud detection and prevention, and for security purposes. The abovementioned personal data may also be used to comply with applicable laws, with investigations performed by the relevant authorities, law enforcement purposes, and/or to exercise or defend legal claims. In certain cases, we may or will anonymize your personal data. "Anonymous Information" means information which does not enable identification of an individual user, such as aggregated information about the use of our services. We may use Anonymous Information and/or disclose it to third parties without restrictions (for example, in order to improve our services and enhance your experience with them).

## 2. HOW WE PROTECT AND STORE YOUR INFORMATION

2.1. **Security.** We have implemented appropriate technical, organizational and security measures designed to protect your personal data. However, please note that we cannot guarantee that the information will not be compromised as a result of unauthorized penetration to our servers. 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.

2.2. **Retention of your personal data.** In addition to the retention periods mentioned 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. We have an internal data retention policy to ensure that we do not retain your personal data perpetually. Regarding retention of cookies, you can read more in our [cookie policy](#).

## 3. HOW WE SHARE YOUR PERSONAL DATA

In addition to the recipients described above, we may share your personal data as follows:

- To the extent necessary, with regulators, courts or competent authorities, to comply with applicable laws, regulations and rules (including, without limitation, federal, state or local laws), 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, or we consider selling or transferring, some or all of our business, shares or assets to a third party, we will disclose your personal data to such third party (whether actual or potential) in connection with the foregoing events;
- 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, disclose or assign your personal data in connection with the foregoing events; and/or
- Where you have provided your consent to us sharing or transferring your personal data (e.g., where you provide us with marketing consents or opt-in to optional additional services or functionality).

## 4. ADDITIONAL INFORMATION REGARDING TRANSFERS OF PERSONAL DATA

**Storage:** AWS with servers located in United States and Europe (all regions), Azure with servers located in United States and Europe (all regions)

**Access from Israel:** Access from Israel is covered by the European Commission's Adequacy Decision regarding Israel. You can 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](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en)

**Internal transfers:** We ensure transfers within the QualiSystems group will be covered by an agreement entered into by members of the QualiSystems group (an intra-group agreement) which contractually obliges each member to ensure that Personal Data receives an adequate and consistent level of protection wherever it is transferred to;

**External transfers:**

- Where we transfer your Personal Data outside of the 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

5.1. **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 personal data held about you. Your right of access may normally be 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 rectify any personal data we hold that is inaccurate or misleading;
- You have the right to request the erasure/deletion of your personal data (e.g. from our records). Please note that there may be circumstances in which we are required to retain your personal data, for example for the establishment, exercise or defense of legal claims;
- You have the right to object, to or to request restriction, of the processing;
- You have 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 the right to withdraw your consent at any time. 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. Also, please note that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal;
- You also have a right to request certain details of the basis on which your personal data is transferred outside the European Economic Area, but data transfer agreements and/or other details may need to be partially redacted for reasons of commercial confidentiality;
- 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 or before the relevant institutions in your place of residence. We ask that you please attempt to resolve any issues with us before you contact your local supervisory authority and/or relevant institution.

You can exercise your rights by contacting us at [privacy@quali.com](mailto:privacy@quali.com). Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly in accordance with applicable law 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 or verify your identity and for security purposes, before processing and/or honoring your request. 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.

5.2. Deleting your account: Should you ever decide to delete your account, you may do so by emailing [privacy@quali.com](mailto:privacy@quali.com). If you terminate your account, any association between your account and personal data we store will no longer be accessible through your account. However, given the nature of sharing on certain services, any public activity on your account prior to deletion will remain stored on our servers and will remain accessible to the public.

## 6. USE BY CHILDREN

We do not offer our products or services for use by children. If you are under 18, you shall 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

We enable you to interact with third party websites, mobile software applications and products or 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 can collect Personal Data from you. Accordingly, we encourage you to read the terms and conditions and privacy policies of each Third Party Service.

## 8. LOG FILES

We 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 use such information analyze trends and administer the Website, track users’ movement around the Website, and gather demographic information.

## 9. ANALYTIC TOOLS

Our Web Site and/or CloudShell Colony web site may use Analytic tools to collect information about use of the Site. These tools collect information such as how often users visit this Website, what pages they visit when they do so, and what other websites they used prior to coming to this Website. We use the information we get from these tools to maintain and improve the Website and our products. We do not combine the information collected through the use of these tools with personally identifiable information.

The tools we are using are:

- **Google Analytics**. The Website uses a tool called “**Google Analytics**” to collect information about use of the Website. Google Analytics collects information such as how often users visit this Website, what pages they visit when they do so, and what other websites they used prior to coming to this Website. We use the information we get from Google Analytics to maintain and improve the Website and our products. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google’s ability to use and share information collected by Google Analytics about your visits to this Website 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/>.
- **Hotjar**. The Website uses Hotjar in order to better understand our users’ needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don’t like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users’ behavior and their devices (in particular device's IP address (captured and stored only in anonymized form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), preferred language used to display our Website). Hotjar stores this information in a pseudonymized user profile. Neither Hotjar nor we will ever use this information to identify individual users or to match it with further data on an individual user. For further details, please see Hotjar’s privacy policy at <https://www.hotjar.com/legal/policies/privacy>. You can opt-out to the creation of a user profile, Hotjar’s storing of data about your usage of our Website and Hotjar’s use of tracking cookies on other websites on this link <https://www.hotjar.com/legal/compliance/opt-out>.
- **Amplitude**. For more information about Amplitude please check <https://amplitude.com/privacy>
- We reserve the right to use other analytic tools

## 10. 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](mailto:privacy@quali.com). Please note that we are only required to respond to one request per customer each year.

## 11. 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.

## 12. 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 Data 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.

## 13. 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](mailto:privacy@quali.com).