

Privacy Policy

Effective: October 1, 2018

This Privacy Policy describes how DLP On Demand collects, uses and discloses information, and what choices you have with respect to the information.

Updates in this version of the Privacy Policy reflect changes in data protection law. In addition, we have worked to make the Privacy Policy clearer and more understandable by:

- organizing it into the sections listed in the Table of Contents below,
- providing a series of examples that help illustrate how the policies may be implemented by DLP On Demand and
- defining and capitalizing a few terms that are used more than once for simplicity and brevity.

When we refer to “**DLP On Demand**”, we mean the eCommerce site produced by DLP Marketing that acts as the controller or processor of your information, as explained in more detail in the “Identifying the Data Controller and Processor” section below.

Table of Contents:

- [Applicability of this Privacy Policy](#)
- [Information We Collect and Receive](#)
- [How We Use Information](#)
- [Data Retention](#)
- [How We Share and Disclose Information](#)
- [Security](#)
- [Age Limitations](#)
- [Changes to this Privacy Policy](#)
- [Identifying the Data Controller and Processor](#)
- [Your Rights](#)
- [Data Protection Authority](#)
- [Contacting DLP](#)

Applicability Of This Privacy Policy

This Privacy Policy applies to DLP On Demand’s online eCommerce site and platform, including dlpmtg.com and other DLP On Demand websites (collectively, the “**Websites**”) and other interactions (e.g., customer service inquiries, user transactions, etc.) you may have with DLP On Demand. If you do not agree with the terms, do not access or use the Goods and Services, Websites or any other aspect of DLP On Demand’s business.

This Privacy Policy does not apply to any third party applications or software that integrate with the eCommerce site through the DLP On Demand platform (“**Third Party Services**”), or any other third party products, services or businesses. In addition, a separate agreement governs delivery, access and use of the Goods and Services (the “**Customer Agreement**”), including the processing of any messages, files or other content submitted through User accounts (collectively, “**Customer Data**”). The entity or person that entered into the Customer Agreement (“**Customer**”) controls their use of the Goods and Services and any associated Customer Data.

Information We Collect And Receive

DLP On Demand may collect and receive Customer Data and other information and data (“**Other Information**”) in a variety of ways:

- **Customer Data.** Customers (“**Authorized Users**”) routinely submit Customer Data to DLP On Demand when using the eCommerce site.
- **Other Information.** DLP On Demand also collects, generates and/or receives Other Information:
 - I. **Account Information.** To create or update a user account, you (the Customer) supply DLP On Demand with an email address, phone number, password and/or similar account details. In addition, Customers that purchase a Goods and Services offered on our eCommerce site provide DLP On Demand (or its payment processors) with billing details such as credit card information, banking information and/or a billing address.
 - II. **Usage Information.**
 - *Log data.* As with most websites and technology services delivered over the Internet, our servers automatically collect information when you access or use our Websites or Goods and Services and record it in log files. This log data may include the Internet Protocol (IP) address, the address of the web page visited before using the Website or Goods and Services, browser type and settings, the date and time the Goods and Services were used, information about browser configuration and plugins, language preferences and cookie data.
 - *Device information.* DLP On Demand collects information about devices accessing the eCommerce site, including type of device, what operating system is used, device settings, application IDs, unique device identifiers and crash data. Whether we collect some or all of this Other Information often depends on the type of device used and its settings.
 - *Location information.* We receive information from you, the Customer, and other third-parties that helps us approximate your location. We may, for example, use a business address submitted by you, or an IP address received from your browser or device to determine approximate location. DLP On Demand may also collect

location information from devices in accordance with the consent process provided by your device.

- III. Contact Information. In accordance with the consent process provided by your device, any contact information that an Authorized User chooses to import (such as an address book from a device) is collected when using the DLP On Demand eCommerce site.
- IV. Third Party Data. DLP On Demand may receive data about organizations, industries, Website visitors, marketing campaigns and other matters related to our business from parent corporation(s), affiliates and subsidiaries, our partners or others that we use to make our own information better or more useful. This data may be combined with Other Information we collect and might include aggregate level data, such as which IP addresses correspond to zip codes or countries. Or it might be more specific: for example, how well an online marketing or email campaign performed.
- V. Additional Information Provided to DLP On Demand. We receive Other Information when submitted to our Websites or if you request support or otherwise communicate with DLP On Demand.

Generally, no one is under a statutory or contractual obligation to provide any Customer Data or Other Information (collectively, “**Information**”). However, certain Information is collected automatically and, if some Information is not provided, we may be unable to provide the Goods and Services.

How We Use Information

Customer Data will be used by DLP On Demand in accordance with Customer’s instructions, including any applicable terms in the Customer Agreement and Customer’s use of Services functionality, and as required by applicable law. DLP On Demand is a processor of Customer Data and Customer is the controller.

DLP On Demand uses Other Information in furtherance of our legitimate interests in operating our Goods and Services, Websites and business. More specifically, DLP On Demand uses Other Information:

- **To provide, update, maintain and protect our Goods and Services, Websites and business.** This includes use of Other Information to support delivery of the Goods and Services under a Customer Agreement, prevent or address service errors, security or technical issues, analyze and monitor usage, trends and other activities or at an Authorized User’s request.
- **As required by applicable law, legal process or regulation.**
- **To communicate with you by responding to your requests, comments and questions.** If you contact us, we may use your Other Information to respond.
- **To develop and provide innovative marketing tools and additional features.** DLP On Demand tries to make the Goods and Services as useful as possible for Authorized Users. For example, we may introduce new Goods and

Services by using Other Information to help determine and rank the relevance of content to an Authorized User, make Goods and Services suggestions based on historical use and predictive models, identify organizational trends and insights, to customize a Customer experience or create new features and products.

- **To send emails and other communications.** We may send you service, technical and other administrative emails, messages and other types of communications. We may also contact you to inform you about changes in our Goods and Services, our Goods and Services offerings, and important DLP On Demand-related notices, such as security and fraud notices. These communications are considered part of the Goods and Services and you may not opt out of them. In addition, we sometimes send emails about new product features, promotional communications or other news about DLP On Demand. These are marketing messages so you can control whether you receive them.
- **For billing, account management and other administrative matters.** DLP On Demand may need to contact you for invoicing, account management and similar reasons and we use account data to administer accounts and keep track of billing and payments.
- **To investigate and help prevent security issues and abuse.**

If Information is aggregated or de-identified so it is no longer reasonably associated with an identified or identifiable natural person, DLP On Demand may use it for any business purpose. To the extent Information is associated with an identified or identifiable natural person and is protected as personal data under applicable data protection law, it is referred to in this Privacy Policy as “**Personal Data.**”

Data Retention

DLP On Demand will retain Customer Data in accordance with a Customer’s instructions, including any applicable terms in the Customer Agreement and Customer’s use of Services functionality, and as required by applicable law. Customer may also apply different settings to messages, files or other types of Customer Data. DLP On Demand may retain Other Information pertaining to you for as long as necessary for the purposes described in this Privacy Policy. This may include keeping your Other Information after you have deactivated your account for the period of time needed for DLP On Demand to pursue legitimate business interests, conduct audits, comply with (and demonstrate compliance with) legal obligations, resolve disputes and enforce our agreements.

How We Share And Disclose Information

This section describes how DLP On Demand may share and disclose Information. Customers determine their own policies and practices for the sharing and disclosure of Information, and DLP On Demand does not control how they or any other third parties choose to share or disclose Information.

- **Customer's Instructions.** DLP On Demand will solely share and disclose Customer Data in accordance with a Customer's instructions, including any applicable terms in the Customer Agreement and Customer's use of Services functionality, and in compliance with applicable law and legal process.
- **Customer Access.** Owners, administrators, Authorized Users and other Customer representatives and personnel may be able to access, modify or restrict access to Other Information. This may include, for example, your employer using the eCommerce site features for accessing or modifying your profile details.
- **Third Party Service Providers and Partners.** We may engage third party companies or individuals as service providers or business partners to process Other Information and support our business. These third parties may, for example, provide virtual computing and storage services.
- **Third Party Services.** Customer may enable or permit Authorized Users to enable Third Party Services. When enabled, DLP On Demand may share Other Information with Third Party Services. Third Party Services are not owned or controlled by DLP On Demand and third parties that have been granted access to Other Information may have their own policies and practices for its collection and use. Please check the privacy settings and notices in these Third Party Services or contact the provider for any questions.
- **Corporate Affiliates.** DLP On Demand may share Other Information with its corporate affiliates, parents and/or subsidiaries.
- **During a Change to DLP On Demand's Business.** If DLP On Demand engages in a merger, acquisition, bankruptcy, dissolution, reorganization, sale of some or all of DLP On Demand's assets or stock, financing, public offering of securities, acquisition of all or a portion of our business, a similar transaction or proceeding, or steps in contemplation of such activities (e.g. due diligence), some or all Other Information may be shared or transferred, subject to standard confidentiality arrangements.
- **Aggregated or De-identified Data.** We may disclose or use aggregated or de-identified Other Information for any purpose. For example, we may share aggregated or de-identified Other Information with prospects or partners for business or research purposes, such as telling a prospective DLP On Demand customer the average amount of time spent on the eCommerce site.
- **To Comply with Laws.** If we receive a request for information, we may disclose Other Information if we reasonably believe disclosure is in accordance with or required by any applicable law, regulation or legal process. Please see the [Data Request Policy](#) to understand how DLP On Demand responds to requests to disclose data from government agencies and other sources.
- **To enforce our rights, prevent fraud, and for safety.** To protect and defend the rights, property or safety of DLP On Demand or third parties, including enforcing contracts or policies, or in connection with investigating and preventing fraud or security issues.
- **With Consent.** DLP On Demand may share Other Information with third parties when we have consent to do so.

Security

DLP On Demand takes security of data very seriously. DLP On Demand works hard to protect Other Information you provide from loss, misuse, and unauthorized access or disclosure. These steps take into account the sensitivity of the Other Information we collect, process and store, and the current state of technology. To learn more about current practices and policies regarding security and confidentiality of the DLP On Demand eCommerce site, please see our [Security Practices](#). Given the nature of communications and information processing technology, DLP On Demand cannot guarantee that Information, during transmission through the Internet or while stored on our systems or otherwise in our care, will be absolutely safe from intrusion by others.

Age Limitations

To the extent prohibited by applicable law, DLP On Demand does not allow use of our Goods and Services and Websites by anyone younger than 16 years old. If you learn that anyone younger than 16 has unlawfully provided us with personal data, please contact us and we will take steps to delete such information.

Changes To This Privacy Policy

DLP On Demand may change this Privacy Policy from time to time. Laws, regulations and industry standards evolve, which may make those changes necessary, or we may make changes to our business. We will post the changes to this page and encourage you to review our Privacy Policy to stay informed. If we make changes that materially alter your privacy rights, DLP On Demand will provide additional notice, such as via email. If you disagree with the changes to this Privacy Policy, you should deactivate your DLP On Demand user account.

Identifying The Data Controller And Processor

Data protection law in certain jurisdictions differentiates between the “controller” and “processor” of information. In general, you, the Customer, are the controller of Customer Data. In general, DLP Marketing is the processor of Customer Data and the controller of Other Information. DLP Marketing, Inc., a US company based in Scottsdale, Arizona is the controller of Other Information and a processor of Customer Data relating to Authorized Users who use DLP On Demand Goods and Services established for Customers in the US.

Your Rights

Individuals located in certain countries have certain statutory rights in relation to their personal data. Subject to any exemptions provided by law, you may have the right to request access to Information, as well as to seek to update, delete or correct this

Information. You can usually do this using the settings and tools provided in your DLP On Demand user account. If you cannot use the settings and tools, contact us for additional access and assistance. Please check the section below entitled Contacting DLP for contact information.

To the extent that DLP On Demand's processing of your Personal Data is subject to the General Data Protection Regulation, DLP On Demand relies on its legitimate interests, described above, to process your data. DLP On Demand may also process Other Information that constitutes your Personal Data for direct marketing purposes and you have a right to object to DLP On Demand's use of your Personal Data for this purpose at any time.

Data Protection Authority

Subject to applicable law, you also have the right to (i) restrict DLP On Demand's use of Other Information that constitutes your Personal Data and (ii) lodge a complaint with your local data protection authority.

Contacting DLP

Please also feel free to contact DLP On Demand if you have any questions about this Privacy Policy or DLP On Demand's practices, or if you are seeking to exercise any of your statutory rights. You may contact us at support@dlpmktg.com or at our mailing address below:

For Customers and Authorized Users who use the DLP On Demand eCommerce site, services and products established for Customers in the US:

DLP On Demand
1525 N Granite Reef Rd, Suite 5
Scottsdale, AZ 85257 | USA
1-833-DLP-MKTG (1-833-357-6584)