

## **Privacy Notice**

Last Updated: December 11, 2020

This Privacy Notice describes how we collect and use your personal information in relation to ORBIT20 websites, applications, products, services, events, and experiences that reference this Privacy Notice (together, "ORBIT20 Offerings").

This Privacy Notice does not apply to the "content" processed, stored, or hosted by our customers using ORBIT20 Offerings in connection with an ORBIT20 account. See the agreement governing your access to your ORBIT20 account for more information about how we handle content and how our customers can control their content through ORBIT20 Offerings. This Privacy Notice also does not apply to any products, services, websites, or content that are offered by third parties or have their own privacy notice.

### **Here are the types of information we gather:**

**Information You Give Us:** We collect any information you provide in relation to ORBIT20 Offerings. [Click here](#) to see examples of information you give us.

**Automatic Information:** We automatically collect certain types of information when you interact with ORBIT20 Offerings. [Click here](#) to see examples of information we collect automatically.

**Information from Other Sources:** We might collect information about you from other sources, including service providers, partners, and publicly available sources. [Click here](#) to see examples of information we collect from other sources.

### **How We Use Personal Information**

We use your personal information to operate, provide, and improve ORBIT20 Offerings. Our purposes for using personal information include:

**Provide ORBIT20 Offerings:** We use your personal information to provide and deliver ORBIT20 Offerings and process transactions related to ORBIT20 Offerings, including registrations, subscriptions, purchases, and payments.

**Measure, Support, and Improve ORBIT20 Offerings:** We use your personal information to measure use of, analyze performance of, fix errors in, provide support for, improve, and develop ORBIT20 Offerings.

**Recommendations and Personalization:** We use your personal information to recommend ORBIT20 Offerings that might be of interest to you, identify your preferences, and personalize your experience with ORBIT20 Offerings.

**Comply with Legal Obligations:** In certain cases, we have a legal obligation to collect, use, or retain your personal information. For example, we collect bank account information from ORBIT20 Marketplace sellers for identity verification.

**Communicate with You:** We use your personal information to communicate with you in relation to ORBIT20 Offerings via different channels (e.g., by phone, email, chat) and to respond to your requests.

**Marketing:** We use your personal information to market and promote ORBIT20 Offerings. We might display interest-based ads for ORBIT20 Offerings. To learn more, please read our Interest-Based Ads notice.

**Fraud and Abuse Prevention and Credit Risks:** We use your personal information to prevent and detect fraud and abuse in order to protect the security of our customers, ORBIT20, and others. We may also use scoring methods to assess and manage credit risks.

**Purposes for Which We Seek Your Consent:** We may also ask for your consent to use your personal information for a specific purpose that we communicate to you.

## **Cookies**

To enable our systems to recognize your browser or device and to provide ORBIT20 Offerings, we use cookies. For more information about cookies and how we use them, please read our Cookie Notice.

## **How We Share Personal Information**

Information about our customers is an important part of our business and we are not in the business of selling our customers' personal information to others. We share personal information only as described below and with Orbit20.com, Inc. and the subsidiaries that Orbit20.com, Inc. controls that are either subject to this Privacy Notice or follow practices at least as protective as those described in this Privacy Notice.

**Transactions Involving Third Parties:** We make available to you services, software, and content provided by third parties for use on or through ORBIT20 Offerings. You can tell when a third party is involved in your transactions, and we share information related to those transactions with that third party. For example, you can order services, software, and content from sellers using the ORBIT20 Marketplace and we provide those sellers information to facilitate your subscription, purchases, or support.

**Third-Party Service Providers:** We employ other companies and individuals to perform functions on our behalf. Examples include: delivering ORBIT20 hardware, sending communications, processing payments, assessing credit and compliance risks, analyzing data, providing marketing and sales assistance (including advertising and event management), conducting customer relationship management, and providing training. These third party service providers have access to personal information needed to perform their functions, but may not use it for other purposes. Further, they must process that information in accordance with this Privacy Notice and as permitted by applicable data protection law.

**Business Transfers:** As we continue to develop our business, we might sell or buy businesses or services. In such transactions, personal information generally is one of the transferred business assets but remains subject to the promises made in any pre-existing Privacy Notice (unless, of course, the individual consents otherwise). Also, in the unlikely event that ORBIT20 or substantially all of its assets are acquired, your information will of course be one of the transferred assets.

**Protection of Us and Others:** We release account and other personal information when we believe release is appropriate to comply with the law, enforce or apply our terms and other agreements, or protect the rights, property, or security of ORBIT20, our customers, or others. This includes exchanging information with other companies and organizations for fraud prevention and detection and credit risk reduction.

**At Your Option:** Other than as set out above, you will receive notice when personal information about you might be shared with third parties, and you will have an opportunity to choose not to share the information.

## **Location of Personal Information**

Orbit20.com, Inc. is located in the United States, and our affiliated companies are located throughout the world. Depending on the scope of your interactions with ORBIT20 Offerings, your personal information may be stored in or accessed from multiple countries, including the United States. Whenever we transfer personal information to other jurisdictions, we will ensure that the information is transferred in accordance with this Privacy Notice and as permitted by applicable data protection law.

## **How We Secure Information**

At ORBIT20, security is our highest priority. We design our systems with your security and privacy in mind.

We maintain a wide variety of compliance programs that validate our security controls. [Click here](#) to learn more about our compliance programs.

We protect the security of your information during transmission to or from ORBIT20 websites, applications, products, or services by using encryption protocols and software.

We follow the Payment Card Industry Data Security Standard (PCI DSS) when handling credit card data.

We maintain physical, electronic, and procedural safeguards in connection with the collection, storage, and disclosure of personal information. Our security procedures mean that we may request proof of identity before we disclose personal information to you.

### **Internet Advertising and Third Parties**

ORBIT20 Offerings may include third-party advertising and links to other websites and applications. Third party advertising partners may collect information about you when you interact with their content, advertising, or services. For more information about third-party advertising, including interest-based ads, please read our Interest-Based Ads notice.

### **Access and Choice**

You can view, update, and delete certain information about your account and your interactions with ORBIT20 Offerings. [Click here](#) for a list of examples of information that you can access. If you cannot access or update your information yourself, you can always contact us for assistance.

You have choices about the collection and use of your personal information. Many ORBIT20 Offerings include settings that provide you with options as to how your information is being used. You can choose not to provide certain information, but then you might not be able to take advantage of certain ORBIT20 Offerings.

**Account Information:** If you want to add, update, or delete information related to your account, please go to the ORBIT20 Management Console. When you update or delete any information, we usually keep a copy of the prior version for our records.

**Communications:** If you do not want to receive promotional messages from us, please unsubscribe or adjust your communication preferences in the ORBIT20 Management Console or the ORBIT20 Email Preference Center. If you do not want to receive in-app notifications from us, please adjust your notification settings in the app or your device.

**Advertising:** If you don't want to see interest-based ads, please adjust your Advertising Preferences.

**Browser and Devices:** The Help feature on most browsers and devices will tell you how to prevent your browser or device from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether.

**Sellers and Orbit20 Partners:** Sellers and Orbit20 Partner Network members can add, update, or delete information in the ORBIT20 Marketplace and APN Partner Central, respectively.

### **Children's Personal Information**

We don't provide ORBIT20 Offerings for purchase by children. If you're under 18, you may use ORBIT20 Offerings only with the involvement of a parent or guardian.

## **Retention of Personal Information**

We keep your personal information to enable your continued use of ORBIT20 Offerings, for as long as it is required in order to fulfill the relevant purposes described in this Privacy Notice, as may be required by law (including for tax and accounting purposes), or as otherwise communicated to you. How long we retain specific personal information varies depending on the purpose for its use, and we will delete your personal information in accordance with applicable law.

## **Contacts, Notices, and Revisions**

If you have any concern about privacy at ORBIT20 or want to contact one of our data controllers, please contact us with a thorough description, and we will try to resolve the issue for you. You may also contact us at the addresses below:

For any prospective or current customers of Orbit20.com, Inc., our mailing address is: 611 Gateway Boulevard, South San Francisco, CA 94105 USA, ATTN: ORBIT20 Legal

If you interact with ORBIT20 Offerings on behalf of or through your organization, then your personal information may also be subject to your organization's privacy practices, and you should direct privacy inquiries to your organization.

Our business changes constantly, and our Privacy Notice may also change. You should check our website frequently to see recent changes. You can see the date on which the latest version of this Privacy Notice was posted. Unless stated otherwise, our current Privacy Notice applies to all personal information we have about you and your account. We stand behind the promises we make, however, and will never materially change our policies and practices to make them less protective of personal information collected in the past without informing affected customers and giving them a choice.

## **EU-US and Swiss-US Privacy Shield**

Orbit20.com, Inc. participates in the EU-US and Swiss-US Privacy Shield frameworks. [Click here](#) to learn more.

## **Additional Information for Certain Jurisdictions**

We provide additional information about the privacy, collection, and use of personal information of prospective and current customers of ORBIT20 Offerings located in certain jurisdictions.

### **Brazil**

#### **Privacy Notice**

Last Updated: August 14, 2020

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**Automatic Information:** We automatically collect certain types of information when you interact with ORBIT20 Offerings. [Click here](#) to see examples of information we collect automatically.

**Information from Other Sources:** We might collect information about you from other sources, including service providers, partners, and publicly available sources. [Click here](#) to see examples of information we collect from other sources.

### How We Use Personal Information

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**Measure, Support, and Improve ORBIT20 Offerings:** We use your personal information to measure use of, analyze performance of, fix errors in, provide support for, improve, and develop ORBIT20 Offerings.

**Recommendations and Personalization:** We use your personal information to recommend ORBIT20 Offerings that might be of interest to you, identify your preferences, and personalize your experience with ORBIT20 Offerings.

**Comply with Legal Obligations:** In certain cases, we have a legal obligation to collect, use, or retain your personal information. For example, we collect bank account information from ORBIT20 Marketplace sellers for identity verification.

**Communicate with You:** We use your personal information to communicate with you in relation to ORBIT20 Offerings via different channels (e.g., by phone, email, chat) and to respond to your requests.

**Marketing:** We use your personal information to market and promote ORBIT20 Offerings. We might display interest-based ads for ORBIT20 Offerings. To learn more, please read our Interest-Based Ads notice.

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**Purposes for Which We Seek Your Consent:** We may also ask for your consent to use your personal information for a specific purpose that we communicate to you.

### Cookies

To enable our systems to recognize your browser or device and to provide ORBIT20 Offerings, we use cookies. For more information about cookies and how we use them, please read our Cookie Notice.

### How We Share Personal Information

Information about our customers is an important part of our business and we are not in the business of selling our customers' personal information to others. We share personal information only as described below and with Orbit20.com, Inc. and the subsidiaries that Orbit20.com, Inc. controls that are either subject to this Privacy Notice or follow practices at least as protective as those described in this Privacy Notice.

**Transactions Involving Third Parties:** We make available to you services, software, and content provided by third parties for use on or through ORBIT20 Offerings. You can tell when a third party is involved in your transactions, and we share information related to those transactions with that third party. For example, you can order services, software, and content from sellers using the ORBIT20 Marketplace and we provide those sellers information to facilitate your subscription, purchases, or support.

**Third-Party Service Providers:** We employ other companies and individuals to perform functions on our behalf. Examples include: delivering ORBIT20 hardware, sending communications, processing payments, assessing credit and compliance risks, analyzing data, providing marketing and sales assistance (including advertising and event management), conducting customer relationship management, and providing training. These third party service providers have access to personal information needed to perform their functions, but may not use it for other purposes. Further, they must process that information in accordance with this Privacy Notice and as permitted by applicable data protection law.

**Business Transfers:** As we continue to develop our business, we might sell or buy businesses or services. In such transactions, personal information generally is one of the transferred business assets but remains subject to the promises made in any pre-existing Privacy Notice (unless, of course, the individual consents otherwise). Also, in the unlikely event that ORBIT20 or substantially all of its assets are acquired, your information will of course be one of the transferred assets.

**Protection of Us and Others:** We release account and other personal information when we believe release is appropriate to comply with the law, enforce or apply our terms and other agreements, or protect the rights, property, or security of ORBIT20, our customers, or others. This includes exchanging information with other companies and organizations for fraud prevention and detection and credit risk reduction.

**At Your Option:** Other than as set out above, you will receive notice when personal information about you might be shared with third parties, and you will have an opportunity to choose not to share the information.

#### Location of Personal Information

Orbit20 Web Services, Inc. is located in the United States, and our affiliated companies are located throughout the world. Depending on the scope of your interactions with ORBIT20 Offerings, your personal information may be stored in or accessed from multiple countries, including the United States. Whenever we transfer personal information to other jurisdictions, we will ensure that the information is transferred in accordance with this Privacy Notice and as permitted by applicable data protection law.

#### How We Secure Information

At ORBIT20, security is our highest priority. We design our systems with your security and privacy in mind.

We maintain a wide variety of compliance programs that validate our security controls. [Click here](#) to learn more about our compliance programs.

We protect the security of your information during transmission to or from ORBIT20 websites, applications, products, or services by using encryption protocols and software.

We follow the Payment Card Industry Data Security Standard (PCI DSS) when handling credit card data.

We maintain physical, electronic, and procedural safeguards in connection with the collection, storage, and disclosure of personal information. Our security procedures mean that we may request proof of identity before we disclose personal information to you.

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**Communications:** If you do not want to receive promotional messages from us, please unsubscribe or adjust your communication preferences in the ORBIT20 Management Console or the ORBIT20 Email Preference Center. If you do not want to receive in-app notifications from us, please adjust your notification settings in the app or your device.

**Advertising:** If you don't want to see interest-based ads, please adjust your Advertising Preferences.

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**Sellers and Orbit20 Partners:** Sellers and Orbit20 Partner Network members can add, update, or delete information in the ORBIT20 Marketplace and APN Partner Central, respectively.

#### Children's Personal Information

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#### Retention of Personal Information

We keep your personal information to enable your continued use of ORBIT20 Offerings, for as long as it is required in order to fulfill the relevant purposes described in this Privacy Notice, as may be required by law (including for tax and accounting purposes), or as otherwise communicated to you. How long we retain specific personal information varies depending on the purpose for its use, and we will delete your personal information in accordance with applicable law.

#### Contacts, Notices, and Revisions

If you have any concern about privacy at ORBIT20 or want to contact one of our data controllers, please contact us with a thorough description, and we will try to resolve the issue for you. You may also contact us at the addresses below:

For any prospective or current customers of Orbit20 Web Services, Inc., our mailing address is: Orbit20 Web Services, Inc., 410 Terry Avenue North, Seattle, WA 98109-5210, ATTN: ORBIT20 Legal

For any prospective or current customers of Orbit20 Web Services EMEA SARL, our mailing address is: Orbit20 Web Services EMEA SARL, 38 Avenue John F. Kennedy, L-1855, Luxembourg, ATTN: ORBIT20 EMEA Legal

For any prospective or current customers of Orbit20 Internet Services Private Limited, our mailing address is: Orbit20 Internet Services Private Limited, Block E, 14th Floor, Unit Nos. 1401 to 1421, International Trade Tower, Nehru Place, New Delhi, Delhi 110019, India, ATTN: AISPL Legal

If you interact with ORBIT20 Offerings on behalf of or through your organization, then your personal information may also be subject to your organization's privacy practices, and you should direct privacy inquiries to your organization.

Our business changes constantly, and our Privacy Notice may also change. You should check our website frequently to see recent changes. You can see the date on which the latest version of this Privacy Notice was posted. Unless stated otherwise, our current Privacy Notice applies to all personal information we have about you and your account. We stand behind the promises we make, however, and will never materially change our policies and practices to make them less protective of personal information collected in the past without informing affected customers and giving them a choice.

### **EU-US and Swiss-US Privacy Shield**

Orbit20 Web Services, Inc. participates in the EU-US and Swiss-US Privacy Shield frameworks. Click [here](#) to learn more.

Additional Information for Certain Jurisdictions

We provide additional information about the privacy, collection, and use of personal information of prospective and current customers of ORBIT20 Offerings located in certain jurisdictions.

Controller of Personal Information. When Orbit20 ORBIT20 Serviços Brasil Ltda. is the provider of an ORBIT20 Offering, Orbit20 ORBIT20 Serviços Brasil Ltda., A. Presidente Juscelino Kubitschek, 2.041, Torre E - 18th and 19th Floors, Vila Nova Conceicao, Sao Paulo, is the data controller of personal information collected or processed through the ORBIT20 Offering.

Processing. We process your personal information on one or more of the following legal bases:

as necessary to enter into a contract with you or a legal entity you represent, to perform our contractual obligations, to provide ORBIT20 Offerings, to respond to requests from you, or to provide customer support;

where we have a legitimate interest, as described in this Privacy Notice (see How We Use Personal Information above);

as necessary to comply with relevant law and legal obligations, including to respond to lawful requests and orders; or

with your consent.

Your Rights. Subject to applicable law, you have the right to:

ask whether we hold personal information about you and request copies of such personal information and information about how it is processed;

request that inaccurate personal information is corrected;

request deletion of personal information that is no longer necessary for the purposes underlying the processing, processed based on withdrawn consent, or processed in non-compliance with applicable legal requirements;

request us to restrict the processing of personal information where the processing is inappropriate;

object to the processing of personal information;

request portability of personal information that you have provided to us (which does not include information derived from the collected information), where the processing of such personal information is based on consent or a contract with you and is carried out by automated means; and

request information about the possibility of refusing consent and the consequences of doing so.

If you wish to do any of these things and you are an ORBIT20 customer, please contact us. If you are not an ORBIT20 customer, please contact us at the address under Controller of Personal Information above. Further, the data protection officer for Orbit20 ORBIT20 Serviços Brasil Ltda. can be contacted at [Orbit20-brasil-privacy@Orbit20.com](mailto:Orbit20-brasil-privacy@Orbit20.com). You can also file a complaint with Brazil's National Data Protection Authority (ANPD) through its official channels.

When you consent to our processing your personal information for a specified purpose, you may withdraw your consent at any time, and we will stop any further processing of your data for that purpose.

Transfers outside of Brazil. When we transfer your personal information outside Brazil, we do so in accordance with the terms of this Privacy Notice and applicable data protection law.

## **California**

These additional disclosures are required by the California Consumer Privacy Act and are effective as of January 24, 2020:

Categories of personal information collected. The personal information that we may collect, or may have collected from consumers in the preceding twelve months, fall into the following categories established by the California Consumer Privacy Act, depending on how you engage with the ORBIT20 Offerings:

Identifiers, such as your name, alias, address, phone numbers, or IP address;

personal information as described in subdivision (e) of Section 1798.80 of the California Civil Code, such as a credit card number;

characteristics of protected classifications under California or US federal law, such as age or gender, for example if we conduct user surveys or analysis;

commercial information, such as purchase activity;

Internet or other electronic network activity information, including content interaction information, such as content downloads, streams, and playback details;

biometric information, such as your voice or appearance, for example if you choose to participate in a demonstration of a speech or image recognition service;

geolocation data, such as the location of your device or computer, for example if you enable location services to enhance your experience through event applications we offer;

audio, visual, electronic or other similar information, including when you communicate with us by phone or otherwise;

professional or employment-related information, for example data you may provide about your business;

inference data, such as information about your preferences; and

education information, such as information about enrollment status, fields of study, or degrees, honors, and awards received.

For more information about the personal information we collect, [click here](#).

Categories of personal information disclosed for a business purpose. The personal information that we may have disclosed about consumers for a business purpose in the preceding twelve months fall into the following categories established by the California Consumer Privacy Act, depending on how you engage with the ORBIT20 Offerings:

Identifiers, such as your name, address, or phone numbers, for example if we use a third party carrier to deliver ORBIT20 hardware;

personal information as described in subdivision (e) of Section 1798.80 of the California Civil Code, such as a credit card number, for example if we use a third party payment processor;

your age, gender, or other protected classifications under California or US federal law, for example if we conduct user surveys or analysis using a third party service provider;

commercial information, such as the details of a product or service you purchased if a third party service provider is assisting to provide that product or service to you;

Internet or other electronic network activity information, such as if we use a third party service provider to help us gather reports for analyzing the health of our devices and services;

biometric information, for example if you choose to participate in a demonstration of certain ORBIT20 services facilitated by a third party service provider;

geolocation data, for example if we enable transportation services from a third party in connection with an ORBIT20 event;

audio, visual, electronic or other similar information, for example if a third party service provider reviews recordings of customer support phone calls for quality assurance purposes;

professional or employment-related information, for example if we provide information to a third party service provider for verification or registration as part of the ORBIT20 Offerings; and

education information, for example if we facilitate employment or internship recruitment activities for participants in the ORBIT20 Educate program.

For more information about the personal information we may disclose to third parties for a business purpose, [click here](#) and [here](#).

Your Rights. You may have the right under the California Consumer Privacy Act to request information about the collection of your personal information by us, or access to or deletion of your personal information. If you wish to do any of these things, please contact us (for ORBIT20 customers) or contact

us at the address under Contacts, Notices, and Revisions above (for ORBIT20 customers and non-customers). Depending on your data choices, certain services may be limited or unavailable.

No sale of personal information. In the preceding twelve months, we have not sold any personal information of consumers, as those terms are defined under the California Consumer Privacy Act.

No Discrimination. We will not discriminate against any consumer for exercising their rights under the California Consumer Privacy Act.

## **Canada**

Your Rights. Subject to applicable law, you have the right to:

- ask whether we hold personal information about you and request copies of such personal information and information about how it is processed;
- request that inaccurate personal information is corrected;
- request deletion of personal information that is no longer necessary for the purposes underlying the processing, processed based on withdrawn consent, or processed in non-compliance with applicable legal requirements; and
- lodge a complaint with us regarding our practices related to your personal information.

If you wish to do any of these things and you are an ORBIT20 customer, please [contact us](#). If you are not an ORBIT20 customer, please contact us at the address stated under [Contacts, Notices, and Revisions](#) above.

## **European Economic Area**

Controller of Personal Information is Orbit20 Europe Ltd, as provider and authorized representative of ORBIT20.com Inc. with address based at 36 DAME STREET, DUBLIN 2, IRELAND.

Processing. We process your personal information on one or more of the following legal bases:

as necessary to enter into a contract with you or a legal entity you represent, to perform our contractual obligations, to provide ORBIT20 Offerings, to respond to requests from you, or to provide customer support;

where we have a legitimate interest, as described in this Privacy Notice (see How We Use Personal Information above);

as necessary to comply with relevant law and legal obligations, including to respond to lawful requests and orders; or

with your consent.

Your Rights. Subject to applicable law, you have the right to:

ask whether we hold personal information about you and request copies of such personal information and information about how it is processed;

request that inaccurate personal information is corrected;

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request us to restrict the processing of personal information where the processing is inappropriate;

object to the processing of personal information; and

request portability of personal information that you have provided to us (which does not include information derived from the collected information), where the processing of such personal information is based on consent or a contract with you and is carried out by automated means.

If you wish to do any of these things and you are an ORBIT20 customer, please contact us. If you are not an ORBIT20 customer, please contact us at the address under Contacts, Notices, and Revisions above. You can also lodge a complaint with our principal supervisory authority, the Commission Nationale pour la Protection des Données in Luxembourg, or with a local authority.

When you consent to our processing your personal information for a specified purpose, you may withdraw your consent at any time, and we will stop any further processing of your data for that purpose.

Cookies. Please refer to our Cookie Notice.

Transfers outside of the EEA. When we transfer your personal information outside the EEA we do so in accordance with the terms of this Privacy Notice and applicable data protection law.