

PLEASE READ THIS PRIVACY POLICY CAREFULLY. BY USING OUR SITE AND THE RELATED SERVICES PROVIDED BY VEST, Inc. D/B/A NetSkeme OR ITS DESIGNEES (THE “SERVICES”), YOU SIGNIFY YOUR AGREEMENT TO THIS POLICY.

Our Full Privacy Policy Is Given Below, But Here Are A Few Key Points:

- We will not sell, lease, or share your personal information with any other companies, except those who need it to help us serve you (e.g. providing your name, and address to our third party shipping agent and payment processor with whom we share your financial information to fulfill payment).
- We will not spam you. For those few emails that we do send out, we always include a way for you to unsubscribe from any and all nonessential communications.

Vest USA, INC. d/b/a NetSkeme (“Vest,” “netskeme,” “we,” “us,” “our,” or the “Company”) is committed to protecting the privacy of individuals who visit the our Web sites (“Visitors”), and individuals who register to use our Products and Services as defined below (“Customers”). This Privacy Statement describes NetSkeme’s privacy practices in relation to the use of the our Web sites and the related applications, services, and programs offered by NetSkeme, as well as individuals’ choices regarding use, access and correction of personal information.

You agree to the use of your data, including personal information, in accordance with NetSkeme’s privacy policies. If you represent a School or an organization, you acknowledge that each end user will need to accept the applicable Company Privacy Policy to use the Services.

NetSkeme complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information it collects. NetSkeme has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

The Federal Trade Commission has jurisdiction over NetSkeme’s compliance with the Privacy Shield.

1. Web Sites Covered

This Privacy Statement covers the privacy practices, including how we collect, use, share and secure the personal information you provide, for Web sites that link to this Privacy Statement (“the Websites”).

2. Information Collected

Automatic Anonymous Information: When you interact with our websites, we collect information about your usage of our sites, your IP address and technical characteristics of your device, like operating system, and browser used. For example, we log environmental variables such as browser type, operating system and CPU speed, and the Internet Protocol (IP) address of your originating Internet Service Provider, to try to bring you the best possible service. We

also record search requests and results to try to ensure the accuracy and efficiency of our search engine. We use your IP address to track your use of the site, including pages visited and the time spent on each page. We collect this information and use it to measure the use of this website and to improve its content and performance. All of the information that is automatically submitted to us by your browser is considered anonymous information. To the extent we share such information with third parties, it is not traceable to any particular user and will not be used to contact you.

When expressing an interest in obtaining additional information about our Products or Services, or registering to use the Web sites or other Services, or registering for an application, we require you to provide us with personal contact information, such as name, company name, postal address, phone number, and email address, login id and password (“Data”).

Cookies: Our website may use cookies. *Cookies* are small data files, typically made up of a string of text and numbers, that assign you a unique identifier. This information enables your computer to have a “dialogue” with our site and permits us to administer our site more efficiently and to provide a more tailored and user-friendly service to you. You may set your browser to notify you when you receive a cookie or to prevent cookies from being sent; if you do so, this may limit the functionality we can provide you when you visit our site. Third parties that link on this site may use cookies or collect other information when you go to their site. We do not control the collection or use of your information by these companies. You should contact these companies directly if you have any questions about their collection or use of information about you.

Exclusions: NetSkeme will treat your Data as confidential information and only use and disclose it in accordance with this privacy policy. However, your Data is not regarded as confidential information if it: (a) is or becomes publicly known other than through breach of this policy; (b) was lawfully known to NetSkeme before receiving it from you; (c) is received by NetSkeme from a third party without knowledge of breach of any obligation owed to you; or (d) was independently developed by NetSkeme without reference to your Data.

In all cases, however, the Personal Data gathered is limited to data necessary for the purposes described under Section 3 herein.

3. Use of Information Collected

We will not sell or give any personally identifiable information to any third parties. We may be required by law enforcement or judicial authorities to provide personally identifiable information to the appropriate governmental authorities. If requested by law enforcement or judicial authorities, we will provide this information only upon receipt of appropriate documentation. We may also release information to law enforcement agencies or other third parties if we feel it is necessary to protect the safety and welfare of our personnel or enforcement of this privacy policy.

When you visit our websites, we collect the Automatic Anonymous Information about your connection. This information is used to improve our services and performance of our websites.

We use the Data to perform the services requested. For example, if you fill out an “Evaluation Request” or a “Support & Feedback” form, then we will use the information provided to contact you to further discuss your interest in our Products or Services. We also use the Data for technical and business communication about our Products & Services.

When you register to use one of our cloud services we collect data that identifies you. A user profile is created in order to identify and authenticate you to use the service. Cookies containing your login username & password may be created to make your login process easier. Customers and Visitors may elect to use the referral program to inform their contacts about our Products & Services. When using the referral program, we request the contact’s name and email address. NetSkeme will automatically send the contact a one-time email inviting him or her to visit the Company’s Web sites. If the contact does not wish to be communicated with any further, we will not send any further communication.

Opt Out:

You may occasionally receive sales offers and other information from us on the email address you provide us. If at any time you do not wish to receive offers and e-mails from us, we ask that you tell us. You may remove your name from our mailing list by sending us an e-mail addressed to support@netskeme.com and indicating in the subject line “No Offers or E-mail.”

4. Sharing of Information Collected

NetSkeme will not share or distribute Customer or Visitor Data except as detailed below.

Service Providers

NetSkeme may share Data about NetSkeme's Visitors & Customers with the Company’s contracted service providers so that these service providers can provide services on our behalf. These service providers are authorized to use your personal information only as necessary to provide the requested services to us.

NetSkeme Affiliates

The Company may share Data about NetSkeme Visitors and Customers with other companies in order to contract work to them, including sub-contractors. For example, the Company may need to share Data about NetSkeme Visitors and Customers with other companies within the NetSkeme affiliates for customer support, marketing, technical operations and account management purposes. These affiliates are authorized to use your personal information only as necessary.

Compelled Disclosure

NetSkeme reserves the right to use or disclose information provided if required by law or if the Company reasonably believes that use or disclosure is necessary to protect the its rights and/or to comply with a judicial proceeding, court order, or legal process. NetSkeme, if permitted by law, will use commercially reasonable efforts to notify you to give you an opportunity to challenge the requirement to disclose.

Transfer of Assets:

Customer lists and information are properly considered assets of a business. Accordingly, if we merge with another entity or if we sell our assets to another entity, our customer lists and information, including personally identifiable information you have provided us, would be included among the assets that would be transferred.

We require that the recipients of your Personal Data offer an adequate level of protection. If you wish to limit the use or sharing of your personal information with our Service Providers and affiliates, please contact us at legal@netskeme.com.

5. International Transfer of Information

We primarily store Data on servers of companies we hire in the United States & Europe to provide services to us. To facilitate NetSkeme's global operations, such information may be accessed by our affiliates in other countries where we operate.

When using the services of third parties, the privacy statement of the third party applies. NetSkeme relies on contractual agreements to provide appropriate safeguards for the transfers.

NetSkeme shall remain liable under the Principles if its agent processes such personal information in a manner inconsistent with the Principles, unless NetSkeme proves that it is not responsible for the event giving rise to the damage.

6. Correcting and Updating your Information

NetSkeme may retain your information for a period of time consistent with the original purpose of collection. For instance, we may retain your information during the time in which you have a reasonable interest in our Products & Services, or for a period we believe your need for the Products & Services persist, and for a reasonable period of time afterward. We may also retain your information during the period of time needed for NetSkeme to pursue our legitimate business interests, conduct audits, comply with our legal obligations, resolve disputes and enforce our agreements.

You may request to review, correct, delete or otherwise modify any of the personal information that you have previously provided to us through the Company's Web sites or through email.

7. Data Security

NetSkeme uses robust security measures to protect Data that you provide to us, in order to ensure the confidentiality and to prevent distortion, damage, destruction or disclosure to unauthorized parties.

NetSkeme maintains reasonable physical, electronic, and procedural safeguards to protect your Data from loss, misuse and unauthorized access, disclosure, modification, and destruction. As part of those safeguards, NetSkeme employs sophisticated technology designed to protect Data during its transmission and prevent transmission errors or unauthorized acts of third parties. However, while NetSkeme strives to protect your Personal Data, in light of the inevitable risks of data transmission over the Internet NetSkeme cannot guarantee full protection against any error occurring during the course of Data transmission that is beyond NetSkeme reasonable control.

Our security and privacy policies are periodically reviewed and enhanced as necessary, and only authorized individuals have access to the personally identifiable information provided by our users. We do not, however, guarantee that unauthorized, inadvertent disclosure will never occur.

8. Contacting Us

Questions regarding this Privacy Statement or the information practices of NetSkeme's Web sites and Services should be directed to NetSkeme Privacy by emailing us at legal@netskeme.com. You may also call our office at +1 (248) 649-9550. In compliance with the Privacy Shield Principles, NetSkeme commits to resolve complaints about our collection or use of your personal information. European Union individuals with inquiries or complaints regarding our Privacy Shield policy should first contact NetSkeme at legal@netskeme.com. NetSkeme commits to cooperate with the panel established by the EU data protection authorities (DPAs) and comply with the advice given by the panel with regard to data transferred from the EU.

Under certain conditions, European Union individuals have the possibility to invoke binding arbitration for complaints regarding Privacy Shield compliance not resolved by any of the other Privacy Shield mechanisms. Additional information is available at [Privacy Shield Framework Annex 1](#).