

Securly - Online Privacy Policy

SECURLY ONLINE PRIVACY POLICY

Last updated: February 2022

Securly, Inc. (“we,” “our” or “us”) recognizes the importance of privacy. This Privacy Policy describes how we collect, store, use and disclose, or otherwise process (collectively “process”) information, including personal information, that we obtain about visitors and users of our website www.securly.com (the “Site”).

This Privacy Policy does not apply to the personal information that we process on behalf of schools and other institutional customers that use our services. For our school institutional customers (e.g., parent, teacher, and administrator data) (collectively “Schools”), we process personal information as a data processor or service provider under applicable laws, only on behalf of the Schools that we serve. Any personal information we collect about children under 13 years old, students of Schools, or their parents, is collected as part of our provision of services and is processed on behalf of will be treated in accordance with our **Services Privacy Policy** as well as our **Terms of Use** and is also subject to the policies and practices of the institution on whose behalf we are processing the information.

For the purposes of this Privacy Policy (“Policy”), “you” and “your” refers only to you as the visitor to our Site. By visiting our Site, you acknowledge that you have been given this notice about how your information, including personal information, will be handled as described in this Policy. Your use of the Site, and any dispute over privacy, is subject to this Policy and our Terms of Use including any applicable limitations on damages and resolution of disputes. The Terms of Use are incorporated by reference into this Policy.

We process your personal information as set forth in this Policy or otherwise with your consent or as permitted or required by law. In case we base our processing of your personal information on your consent, you may withdraw your consent at any time. However, withdrawing consent may result in our inability to continue providing you with access to the Site.

With respect to the personal information that is subject to this Privacy Policy, Securly, Inc. and Securly Ltd. are the controllers of your personal information.

1. Information We Collect About You

We may collect information, including personal information (as defined by applicable privacy law), directly from you, from third parties, or automatically through your use of the Site. We may combine certain information we collect from these various sources.

Information We Collect Directly from You.

We collect information (including personal information) from you directly as set out below.

Communication. We collect personal information from you when you communicate with us, including your name and email address. We may also ask or allow you to submit additional account information, such as your phone number. You may browse parts of our Site without creating an account, however, if you would like to use our services, we ask you to create an account. Data collected about users of our services is governed by the **Service Privacy Policy**.

Customer Support. We collect personal information you provide when you submit a request through our Site, such as your email address, or if you otherwise contact our customer support services via email, phone, or chat, related to your enquiry or complaint. We keep a copy of such records in our customer files.

Newsletters and Updates. You can also sign up to receive emails and offers from us by submitting your name, email address, and zip code or area code. For information on how to opt-out of receiving newsletters and updates via email please see below.

Information We Collect from Third-Party Sources. We may also collect information about you from third parties, which we combine with the information we have collected.

Information We Collect Automatically. We automatically collect information about you through your use of our Site, including your IP address (“Usage Data”). For more information please see the Cookie and Other Tracking Mechanisms Section further below.

2. Purposes and Legal Bases of Use

Certain laws, including the EU and UK General Data Protection Regulation (“GDPR”), require that we inform you of the legal bases for our processing of your personal information. Pursuant to the GDPR (and other similar laws), we process personal information for the following legal bases:

Our Legitimate Business Interests. We process personal information in furtherance of our legitimate business interests, which are not overridden by your interests and fundamental rights, including:

Performance of contracts with customers and other parties

Implementation and operation of support services for our business operations

Improving our Site and services, developing reports, and similar purposes

Customer relationship management and improving our Site and services, including other forms of marketing and analytics

Fraud detection and prevention, including misuse of our Site or services

Physical, IT, and network perimeter security

Internal investigations

Mergers, acquisitions, and reorganization, and other business transactions, including related negotiations

Compliance with Laws. We process personal information to comply with our legal obligations, including those in the area of labor and employment law, social security, and data protection, tax, and other corporate compliance laws, and/or to defend against legal claims.

With Your Consent: We process personal information where we have your consent. For example, for some forms of direct marketing, or for the setting of certain cookies, the GDPR, where it applies, and other applicable laws give you the right to withdraw your consent, which you can do at any time by contacting us using the details set out at the end of this Policy.

Vital Interest. In addition, in rare cases we may process your personal information where necessary to protect the vital interests of any individual.

3. How We Use Your Information

Providing and Improving Services. To maintain and improve our services; to develop new features, products, or services; to perform technical operations, such as updating software; to authenticate you as a valid user; to prevent fraudulent activity on our platform; and for other customer service purposes.

Responding to requests. To respond to your inquiries, fulfill your orders and requests.

Personalizing Content and Ads. We may use the information we collect about you to personalize the information and content we display to you, including to tailor the content and information that we may send or display to you, and to otherwise personalize your experiences, including providing you with more relevant ads.

Marketing and Communications. We may use information about website visitors to send you product or service updates; to respond to your inquiries; to provide you with news, special offers, promotions, and other information we think may interest you; and for other informational, marketing, or promotional purposes. Our communications with you may include communications via email. If you are located in a jurisdiction that requires opt-in consent to receive electronic marketing messages, we will only send you such messages if you opt-in to receive them. You may opt-out of such communications at all times by following the opt-out instructions contained in the e-mail. Please note that it may take up to 10 business days for us to process opt-out requests. If you opt-out of receiving emails about recommendations or other information we think may interest you, but you are a subscriber to our services, we may still send you transactional e-mails, such as about your account or any services you have requested or received from us. We do not use personal information of students or children for any marketing purpose.

Research and Analytics. To analyze how you interact with our Site; to monitor and analyze usage and activity trends; and for other research, analytical, and statistical purposes.

Protecting Our Legal Rights and Preventing Misuse. To protect the Site and our business operations; to prevent and detect fraud, unauthorized activities and access, and other misuse; where we believe necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety or legal rights of any person or third party, or violations of our Terms of Use or this Policy.

Complying with Legal Obligations. To comply with the law or legal proceedings. For example, we may disclose information in response to subpoenas, court order, and other lawful requests by regulators and law enforcement, including responding to national security or law enforcement disclosure requirements.

General Business Operations. To consider and implement mergers, acquisitions, reorganizations, and other business transactions, and, where necessary, to administer our general business, accounting, recordkeeping, and legal functions.

Aggregate, De-identified or Anonymous Data. We also create and use aggregate, anonymous and de-identified data to assess, improve and develop our business, products, and services, and for similar research and analytics purposes. This information is not generally subject to the restrictions in this Policy, provided it does not identify and could not be used to identify a particular individual.

4. How We Disclose Your Information

In general, we disclose the personal information we collect as follows:

Affiliates. We may share your personal information with our affiliates, whose handling of personal information is subject to this Policy.

Service Providers. We may disclose the information we collect from you to our third-party vendors, service providers, marketing partners, third parties, contractors or agents who perform functions on our behalf so we can provide you with the Site. These may include companies that send emails to our customers and prospective customers; help us track email response rates, views and forwards; serve visitor advertisements and provide advertisements about products of interest to them; and collect data about how customers and prospective customers interact with our products over time.

Business Transfers. We may disclose information to another entity in connection with an acquisition or merger, sale or transfer of our assets, bankruptcy proceeding or as part of any other similar business transfer, including during negotiations related to such transactions.

In Response to Legal Process. We also may disclose the information we collect from you in order to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a court order or a subpoena.

To Protect Us and Others. We also may disclose the information we collect from you where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our Terms of Use or this Policy, or as evidence in litigation in which we are involved.

Aggregate and De-Identified Information. We may share aggregate or otherwise de-identified information about users with third parties for marketing, advertising, research, or similar purposes.

5. Use of Cookies and Other Tracking Mechanisms

We and our third-party service providers may use cookies, log files, Web beacons and other tracking mechanisms to track information about your use of our Site. We may combine this information with other personal information we collect from you (and our third-party service providers may do so on our behalf).

Cookies. Cookies are alphanumeric identifiers that we transfer to your computer's hard drive through your web browser for record-keeping purposes. Some cookies allow us to make it easier for you to navigate our Site, while others are used to enable a faster login process or to allow us to track your activities at our Site and Service. There are two types of cookies: session and persistent cookies.

Disabling Cookies. Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future. The Help portion of the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Visitors to our Site who disable cookies will be able to browse certain areas of the Site, but some features may not function. Please keep in mind that without cookies you may not have access to certain features of our products and services on this site, including access to your account or profile and certain personalized content.

Clear GIFs, Pixel Tags and Other Technologies. Clear GIFs are tiny graphics with a unique identifier, similar in function to cookies. In contrast to cookies, which are stored on your computer's hard drive, clear GIFs are embedded invisibly on web pages. We may use clear GIFs (a.k.a. web beacons, web bugs or pixel tags) in connection with our Site to, among other things, track the activities of Site visitors, help us manage content, and compile statistics about Site usage. We and our third-party service providers may also use clear GIFs in HTML e-mails to you, to help us track e-mail response rates, identify when our e-mails are viewed, and track whether our e-mails are forwarded.

Third Party Analytics. We use automated devices and applications, such as Google Analytics, to evaluate usage of our Site. We also may use other analytic means to evaluate our Site. We use these tools to help us improve our Site, performance, and user experience. These entities may use cookies and other tracking technologies to perform their services.

Geolocation Information. We may use geolocation information for the purpose of administering our Site.

Do-Not-Track Signals. Our Site does not currently respond to do-not-track signals. For more information about do-not-track signals, please click [here](#). You may, however, disable certain tracking as discussed in the Cookies and Other Tracking Mechanisms section above (e.g., by disabling cookies).

6. Interest-Based Advertising

We may work with third parties such as network advertisers to assist us in displaying advertisements on third-party websites, and to evaluate the success of our advertising campaigns. We may use information about your visit to our Site for these purposes.

You may opt-out of many third-party ad networks, including those operated by members of the Network Advertising Initiative ("NAI") and the Digital Advertising Alliance ("DAA"). For more information regarding this practice by NAI members and DAA members, and your choices regarding having this information used by these companies, including how to opt out of ad networks operated by NAI and DAA members, please visit their respective websites:

Canada: <http://youradchoices.ca>

EU: <http://youronlinechoices.eu>

US: <http://aboutads.info>; <https://optout.networkadvertising.org/>

Opting out of participation in the ad networks does not opt you out of being served advertising. You may continue to receive generic or "contextual" ads on our Site, for example, based on the particular website that you are viewing (i.e., contextual advertising). You may also continue to receive targeted ads on other websites, from companies that do not participate in the above programs. Please note that opt-out mechanisms are cookie based; so, if you delete cookies, configure your browser to block or reject cookies or use another device, your opt-out will no longer be effective.

7. International Transfers

Securely, Inc. is headquartered in the United States of America and has operations and service providers in the United States and other jurisdictions. As such, we and our service providers may transfer your personal information to, or access it in, jurisdictions (including the United States, India, and Mexico) that may not provide levels of data protection equivalent to your home jurisdiction. We will take steps to ensure that your personal information receives an adequate level of protection in the jurisdictions in which we process it in accordance with applicable laws, including through appropriate written data processing terms and/or data transfer agreements.

If you are in the European Economic Area ("EEA") or the United Kingdom ("UK"), and we process your personal information in a jurisdiction that the relevant regulator has deemed to not provide an adequate level of data protection (a "third country"), we rely upon legal measures to adequately protect your personal information. These measures include standard contractual clauses approved by the European Commission or another method approved by the European Commission as providing adequate safeguards for the protection of personal information when transferred to a third country. You have a right to obtain details of the mechanism under which your personal information is transferred outside of the EEA; you may request such details by contacting us as set forth in the "Contact us" section below.

8. Security of Your Personal Information

The security of your personal information is important to us. We have implemented a security program designed to protect the information we collect from loss, misuse, unauthorized access, disclosure, alteration, and destruction. However, given the nature of information security, there is no guarantee that our Site will be 100% secure.

We encourage you to help protect the security of your personal information. For instance, you should never give out your personal credentials when you are using the Site. Furthermore, you are responsible for maintaining the security of any personal computing device on which you utilize

the Site. We are not responsible for any lost, stolen, or compromised passwords or for any activity on your account via unauthorized password activity.

9. No Automated Decision-Making

Securly itself does not take any actions that affect the legal rights of persons; Securly is a tool that helps parents, schools, and others make better informed decisions about how to protect and guide the children in their care. Our services do not make automated decisions that have legal impacts on anyone without human review. Although our services may block a particular person from a particular site at a particular moment, the information from the services and the decision to continue to block any particular sites are always subject to human review.

10. Data Subject Rights

If you live in the EEA or other jurisdictions, including Australia, California, Canada, the United Kingdom, and certain other jurisdictions, you may have certain data subject rights. These rights vary, but they may include the right to:

Request access to and deletion of your personal data that we hold, restrict or object to certain processing of your data by us, or request transfer of appropriate data to a third party where this is technically feasible; and

Request the information on the recipients or categories of recipients with whom we share your personal data.

You can make a request to exercise these rights by contacting us at support@securly.com or calling 1 (855) 732-8759 (ext. 101). We will review your request and respond accordingly. The rights described herein are not absolute.

You will not have to pay a fee for the disclosure of your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for disclosure is manifestly unfounded or excessive. We will not provide disclosure of your personal data more than twice in any 12-month period.

Individuals who submit requests for access or erasure of personal information will be required to verify their identity by answering certain questions. We will not disclose or delete any information until such individual's identity is verified.

You may designate an authorized agent to submit a request on your behalf by providing that agent with your written permission. If an agent makes a request on your behalf, we may still ask that you verify your identity directly with us before we can honor the request.

Agents who make requests on behalf of individuals will be required to verify the request by submitting written authorization from the individual. We will not honor any requests from agents until authorization is verified.

We do not sell personal information, and we will not discriminate on the basis that you have exercised any of your rights under the California Consumer Privacy Act.

11. Children

Our Site is not directed to children under the age of 13, and we do not knowingly collect personal information from children under the age of 13 on this Site. If we discover that we inadvertently collected information from a child under the age of 13 through the Site, we will promptly delete it. With respect to the personal information collected from children and students under the age of 13 via the Services, please refer to our Services Privacy Policy.

12. Retention

We will generally keep personal information only for as long as it remains necessary for the identified purposes for which it was collected or as authorized or required by law. We may retain certain data as necessary to prevent fraud or future abuse, or for legitimate business purposes, such as analysis of aggregated data, account recovery, or if required by law. All retained personal information will remain subject to the terms of this Policy.

13. Changes to this Policy

This Policy is current as of the date set forth above. We may change this Policy from time to time, so please be sure to check back periodically. We will post any changes to this Policy on our [Site](#). If we make any changes to this Policy that materially affect our practices with regard to personal information, we will endeavor to provide you with notice in advance of such change by prominently highlighting the change on our Site or make other appropriate notice to you.

14. Links

When you visit our Site and leave to go to another linked site, we are not responsible for the content or availability of the linked site. Please be advised that if you enter into a transaction on the third-party site, we do not represent either the third party or you. Further, the privacy and security policies of the linked site may differ from ours.

15. Shine the Light

Under California Civil Code Section 1798.83, Californians are entitled to request information relating to whether a business has disclosed personal information to any third parties for the third parties' direct marketing purposes. Californians who wish to request further information about our compliance with this statute or who have questions, more generally, about our Privacy Policy and our privacy commitments and our Site should contact us as set out in the "Contact Us" section above.

16. Contact Us

If you have any questions, comments, or concerns about the privacy aspects of our Site or services or would like to make a complaint, please contact:

Bharath Madhusudan
Privacy Director
Securly, Inc.
111 N. Market Street, 4th floor, Suite 400
San Jose, California 95113
United States
support@securly.com
1 (855) 732-8759 (ext. 101)