

# NEWIRED DIGITAL ADOPTION SOLUTION - WHITE PAPER ABOUT OUR APPROACH TO DATA SECURITY AND PRIVACY

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Newired s.l.r. and its affiliates (“*Newired*“, “*we*” or “*us*“) is committed to protecting the privacy of the users of Newired’s products. The products are named collectively as the **Newired Digital Adoption Solution** (to be referred to in this document as the “*Solution*”).

A *User* may be either an entity that executed an agreement with *Newired* or with *Newired*’s resellers or organizations who have deployed the *Solution* (“*Customer(s)*“) or *Customer*’s users of the *Solution* (“*End User(s)*“).

This document explains the types of information we may collect from the Users and our practices for collecting, using, maintaining, protecting, and disclosing that information, as well as your rights in determining what we do with the information that we collect and hold about the Users.

***Newired Website Privacy Policy***: For information regarding the data processing *Newired Website*’s Users, please click [here](#).

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## GENERAL STATEMENTS

### A. CONSENT AND PRINCIPLES OF PROCESSING DATA

*Newired* processes data fairly, lawfully, transparently and in accordance with individuals' rights (as applicable). The use of information collected through our Solution shall be limited to the purpose of providing the service for which our Client has engaged *Newired*.

*Newired* may process data of an End User on behalf of the Controller when the Controller obtains consent from an End User or when there is another basis for doing so under applicable law. For purposes of this Privacy Policy, a Controller may mean a Customer or anyone acting a Customer's behalf. (the "Controller"), Customers who cause *Newired* to process Personal Information of an End User are obligated to hold all appropriate consents (if applicable) and may only utilize the services pursuant to applicable law. If you are an End User of the Solution, please contact the Controller for additional detail. We may transfer Personal Information to companies that help us provide our Solution service. Transfers to subsequent third parties are covered by the service agreements with our Customers (the Controller). Furthermore, *Newired* supports End Users' rights, under certain laws, to retrieve any information retained on our servers which relates to such End User. *Newired* acknowledges that you may have the right to access your Personal Information. We have processes in place to accommodate an End User's rights to delete data, amend erroneous data, access data and receive Personal Data or Sensitive Data in a machine-readable commonly used format, all subject to reasonable

technical restraints and abilities. For more information, please see the Section “Modification or Deletion of Data” under the applicable Solution Section below. *Newired* will never discriminate against any person based on his/her exercising of their rights hereunder.

Personal Information or Personal Data is information by which an individual may be personally identified, including name, address, e-mail address, telephone number or any other information that is defined as Personal Information, Personal Data, or Personally Identifiable Information under an applicable law (hereinafter referred to as “Personal Information”)

Users are not obligated to provide us with any information by law. However, we require certain information in order to operate properly. Under some jurisdiction (such as under certain applicable E.U. legal frameworks or California Laws), a User has a right to withdraw its consent at any time and in some cases (subject to applicable laws) to request the cessation of any collection of Personal Information. In such a case, the withdrawal will not affect the lawfulness of processing based on consent before its withdrawal, but certain services may not function without certain information provided.

Please note that consent for the gathering and processing of data for the Solution does not automatically mean that a User consents to the processing of data in connection with other services. Controller should always make sure that the User’s consent is relevant, clear, valid, and to the extent reasonably possible, not “bundled” with any other written agreement (especially if required under applicable laws), unambiguous and if required under applicable law, affirmative and active (meaning not by virtue of any inaction).

*Newired* aims to process only adequate, accurate and relevant data limited to the needs and purposes for which it is gathered. It also aims to store data for the time period necessary to fulfill the purpose for which the data is gathered. *Newired* only collects data in connection with a specific legitimate purpose and only processes data in accordance with this Privacy Policy.

## B. MINORS

We do not knowingly collect or solicit information or data from children under the age of 13 or knowingly allow children under the age of 13 to register for the Solution. If you are under 13, do not register or attempt to register for any of the Solution or send any information about yourself to us. If we learn that we have collected or have been sent Personal Information or Personal Data from a child under the age of 13, we reserve the right to delete that Personal Information or Personal Data as soon as reasonably practicable. If you believe that we might have collected or been sent information from a child under the age of 13, please contact our [info@newired.com](mailto:info@newired.com) as soon as possible.

## C. INFORMATION SECURITY

We take great care in implementing, enforcing and maintaining the security of our Solution and Users' information. *Newired* implements, enforces and maintains security policies to prevent unauthorized or accidental access to or destruction, loss, modification, use or disclosure of Personal Information or Personal Data and to monitor compliance of such policies on an ongoing basis. All information is stored with logical separation from the information of other Customers. However, we do not guarantee that unauthorized access will never occur. We use a combination of processes, technology and physical security controls to help protect Personal Information and Personal Data from unauthorized access, use, or disclosure. When Personal Information or Personal Data is transferred over the Internet, we encrypt it using Transfer Layer Security (TLS) encryption technology or similar technology. Each *Newired*'s server is protected by a firewall, exposing it only to the minimum ports necessary. However, no security controls are 100% effective, and we cannot completely ensure or warrant the security of your Personal Information and Personal Data.

Unless otherwise agreed with the Customer and subject to applicable law, *Newired* shall act in accordance with its policies to promptly notify Customer in the event that any Personal Information or Personal Data processed by *Newired* on behalf of a Customer is lost, stolen, or where there has been any unauthorized access to it.

*Newired* may share and use your personal information with third-party vendors and hosting partners to provide the necessary hardware, software, networking, storage, and related technology required to run the Solution. Where practical, we seek to obtain confidentiality agreements that are consistent with this Privacy Policy and that limit others' use or disclosure of your Personal Information and Personal Information.

## THE PRIVACY AND DATA RETENTION PRACTICES RELATED TO THE SOLUTION

This section specifies the privacy and data retention practices related to the use of the Solution (i.e. *Newired* Digital Adoption Solution).

### A. WHAT INFORMATION MAY WE COLLECT ON USERS OF THE SOLUTION

1. Categories of information and data we may collect from our Users.
  - Passive Collection. Passively Collected Information means any information which is available to *Newired* while Users are using the

Solution. Passively Collected Information consists of technical information and behavioral information (i.e. the interaction of the User with the Solution), including, but not limited to, the User's operating system, type of browser, screen resolution, font type, time zone, the period of time the User utilized the Solution, etc.

- Personal Information. Personal Information has the meaning stated in the General Section of this Privacy Policy. By default, the Solution does not collect any Personal Information, other than IP addresses in logs for security purposes End Users' geolocation (country and city in which you are located) and masked IP addresses for the ongoing operation of the Solution, any of which may be considered as Personal Information in some jurisdictions. For more information, please see below.
2. The Solution utilizes certain identifiers retained in a cookie file, as detailed below. Such identifiers are not linked to any Personal Information about a User and may also be stored (without any link to Personal Information) on Newired's servers.
  3. *Newired* may also collect the email addresses of people who communicate with *Newired* via email or create accounts and login credentials.
  4. Customers may use certain features which may cause the system to collect and store additional Personal Information ("*Special Features*"). These Special Features may include:
    - Custom User Identifier: a feature that allows Customers to track End User Identifier by an available HTML element, variable or cookie.
    - User Satisfaction Feedback: a feature that requests a user to provide satisfaction feedback related to the Solution.

To use the Special Features, Customers need to actively turn on or provide their consent to use the applicable Special Feature, each of which is turned off by default. When a Customer turns on one of the Special Features, the Customer agrees to the collection of Personal Information. Certain other features (like surveys and free text fields) may collect Personal Information only if an End User voluntarily provides it. Customers are responsible for the lawful and fair collection of Personal Information through the Solution and to hold any consent, permit or license required by the applicable law to facilitate such collection, retention, use, processing and storage of any data.

Newired is not aware of the nature of the information collected through the Special Features. Such information may include Personal Information about an individual's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership (or non-membership), physical or mental health or condition, criminal offenses, or related proceedings or any other data considered as sensitive under applicable law ("*Sensitive Information*")

## B. HOW DO WE COLLECT INFORMATION ON USERS OF THE SOLUTION?

1. Automatic Collection of Information. When User uses the Solution we gather, collect and record the information relating to such usage, either independently or through the help of third-party services as detailed below.
2. Information User Provides to Us. The user provides us information, including Personal Information, when he/she communicates with us, including for instance providing his/her email when he/she contacts support.

Feature-Specific Information. For more information, see the Section about Special Features above.

## C. WHAT ARE THE PURPOSES OF THE COLLECTION OF INFORMATION BY THE SOLUTION?

1. Passively Collected Information is collected in order to:
  - Provide Customers with the Solution;
  - For customization and improvement of the Solution.
2. Personal Information is collected in order to:
  - Provide Customers with the Solution;
  - Contacting Users and/or customers for the purpose of providing them with technical assistance and other related information about the Solution;
  - Replying to User's queries;
  - Troubleshooting problems, detecting and protecting against error, fraud or other criminal activity.
  - For risk control, to comply with laws and regulations, and to comply with other legal processes and law enforcement requirements.
  - To enforce agreements executed with *Newired* and to enforce this Privacy Policy.

## D. SHARING INFORMATION GATHERED THROUGH THE SERVICE WITH THIRD PARTIES

We will never sell your information. *Newired* may disclose Personal Information collected through the Solution only in the following cases: (a) to satisfy any applicable law, regulation, order, legal process, subpoena or governmental request; (b) to provide Customer with information gathered through the Solution by *Newired* on Customer's behalf; (c) to detect, prevent, or otherwise address fraud, breach of this policy, security or technical issues; (d) to respond to User's support requests; (e) to respond to claims that any content available through the Solution violates the rights of third-parties; (f) to respond to claims that Personal Information (e.g. name, e-mail address, etc.) of a third party has been posted or transmitted without consent or as a form of harassment; (g) to protect the rights, property, or personal safety of *Newired*, its Users, or the general public; (h) when *Newired* is undergoing any change in control, including by means of merger, acquisition or purchase of all or substantially all of its assets; (i) to collect, hold and/or manage your Personal Information through *Newired* authorized affiliates and third party service providers (for example, Amazon Web Services in the United States), solely in connection with the Solution and subject to confidentiality agreements not less stringent than *Newired*'s obligations under this Privacy Policy. Service providers are authorized to use your Personal Information only as necessary to provide these services to us. Such service providers may be located in a country that does not have the same data protection laws as your jurisdiction. When *Newired* transfers data to a service provider, we seek when practical to transfer data only upon executing an appropriate agreement and/or after the certification of the service provider and/or with service providers that are located in a country recognized by the E.U. Council as providing adequate protection; or (j) pursuant to your explicit approval prior to the disclosure.

For the avoidance of doubt, *Newired* may transfer Personal Information to its affiliates which shall be obligated with the same restrictions as agreed with the Customer and as specified in this Privacy Policy.

## E. MODIFICATION OR DELETION OF PERSONAL INFORMATION GATHERED THROUGH THE SOLUTION

Users may have a legal right under certain applicable laws (for instance if the User is residing in the E.U. or in California) or under Controller's (as defined in the General Section) privacy policy to receive, rectify, erase, and restrict Personal Information about them that is held by us, to object to processing and, if processing occurs based on consent, to withdraw their consent. Users may also have the right to withdraw consent to the processing for statistical and research purposes and in some cases (subject to applicable laws) to request the cessation of any collection of Personal Information. *Newired* will never discriminate against any person based on his/her exercising of their rights hereunder.

If, for any reason, a *User* wishes to modify, delete or retrieve his/her Personal Information, s/he may do so by contacting the applicable Controller (as defined in the General Section or provided herein) (e.g. the provider of the platform on which the *Solution* is operating). The Controller shall perform the necessary process to identify the User as a User who has a the right to retrieve the specific information and then furnish to *Newired* the data required to be amended, deleted or retrieved together with a specific identification of the User and data (for instance IP address and time of uploading the information to *Newired's* servers (IP address is not enough for an identification of User or data)). *Newired* cannot retrieve data without a specific identification of User and data. *Newired* may not be able to delete, amend or retrieve User's information without the Controller's instructions and authorization.

Please note that Personal Information may be either deleted or retained in an aggregated manner without being linked to any identifiers or Personal Information, depending on technical commercial capability, including without limitation by setting the last octet of IPv4 user IP addresses such that it cannot be linked to any identifiers of the User. Such information may continue to be used by *Newired* for the purpose of operating the *Solution* or for its legitimate interest without derogating from users' rights.

For any request or question regarding deletion or amendment of User data, you can contact us at the contact details listed in the General Section and we shall make efforts to respond and support your request.

## F. SOLUTION DATA RETENTION

Any Customer may request information regarding the storage and retention of data ("Audit") by contacting us. *Newired* shall make reasonable efforts to respond to the Audit in a reasonable time and subject to applicable law and to the protection of *Newired's* trade secrets.

*Newired* will retain data it processes on behalf of its Customers only for as long as required to provide the *Solution* to its Customers and as necessary to comply with its legal obligations, resolve disputes and enforce its agreements.

However, some data will not be deleted and shall be kept in an anonymized manner. Some metadata and statistical information concerning the use of the *Solution* are not subject to the deletion procedures in this policy and may be retained by *Newired*. Some data may also be retained on our third-party service providers' servers until deleted in accordance with their privacy policy.

## G. COOKIES & PASSIVE COLLECTION BY THE SOLUTION

When you access or use the *Solution*, *Newired* may use industry-wide technologies such as cookies or similar technologies, which store certain information on your computer ("Local Storage") and which will allow the system to enable automatic return to a stage or page you



visited and make your Solution experience much more convenient and personalized. The cookies used by the Solution do not include any Personal Information about you, other than a random persistent identifier, unless configured otherwise by the Customer.

The cookies are retained only for the time period required by the Solution (according to Customer's requirements and settings) but in any event not more than 2 years from cessation of use of the Solution by the Customer (older versions of the system may include cookies stored for a longer period of time).

If you want to delete or block any cookies, please refer to the help and support area on your internet browser for instructions on how to locate the file or directory that stores cookies. Please note that deleting our cookies or disabling future cookies may prevent you from accessing certain areas or features of our Solution or may otherwise adversely affect your user experience.

"Do Not Track" Signals: Please note that we do not change our practices in response to a "Do Not Track" signal in the HTTP header from a browser or mobile application.

## H. THIRD-PARTY SOFTWARE/SERVICE USED BY THE SOLUTION

We may use third-party software and/or services in order to collect and/or process the information detailed herein. Such software includes without limitation:

Vendor	Purpose of usage	Privacy Policy Link
Amazon Web Services Inc.	Hosting infrastructure services	<a href="https://aws.amazon.com/privacy">https://aws.amazon.com/privacy</a>
Digital Ocean LLC.	Hosting infrastructure services	<a href="https://www.digitalocean.com/legal/privacy-policy/">https://www.digitalocean.com/legal/privacy-policy/</a>

## CHANGES

The terms of this Privacy Policy will govern the use of the Solution and any information collected in connection therewith, however, Newired may amend or update this Privacy Policy

from time to time. The most current version of this [Solution](#) Privacy Policy will always be posted at <https://www.newired.com/newired-solution-privacy-policy> without notice or acceptance by you, so please check this page frequently for updates and changes.

## QUESTIONS, CONTACT INFORMATION AND COMPLAINTS

If you have any questions (or comments) concerning this Privacy Policy, you are welcome to email us or otherwise contact us at the following address, and we will make an effort to reply within a reasonable timeframe.

E.U. citizens have the right to lodge a complaint with a supervisory authority (Data Protection Authority in your jurisdiction) in case of a breach of any E.U. data protection and privacy regulations. If the supervisory authority fails to deal with a complaint or inform you within the time frame set under applicable law, you have the right to an effective judicial remedy.

Please do not hesitate to contact us:

Newired s.r.l., Via Ottavio T. Revel 16, I-10121 Torino (TO), Italy  
[info@newired.com](mailto:info@newired.com)