

## ZINGBOX PRIVACY POLICY

*Privacy Policy last revised June 27, 2019.*

Privacy is important to ZingBox, Inc. and its subsidiaries and affiliates (collectively, “**ZingBox**”, “**we**”, “**us**”, or “**our**”). Please carefully read this privacy policy (“**Privacy Policy**”) and familiarize yourself with our privacy practices regarding personal information and how we will use it.

This Privacy Policy applies to the ZingBox sites, including our online and mobile websites available at [www.zingbox.com](http://www.zingbox.com) and mobile apps (collectively, the “**Sites**”), any products or services offered or provided by ZingBox (each, a “**Product**” or “**Service**” and, collectively, the “**Products and Services**”). Products include our proprietary IoT Guardian security software and any other products offered or provided by ZingBox. Services include, without limitation, our proprietary client software application and its related service (the “**Application**”), the Sites and the provision of your access to any other applications, websites, online services, or other services provided by or on behalf of ZingBox.

If you are browsing our Sites (“**Browser**”), a licensee of our Products and Services including prospective and former licensees (“**Account Holder**”), or an individual whose Internet of Things (“**IoT**”) device is connected to a network using our Products and Services (“**Connected User**”), collectively (“**you**”, “**your**”), this Privacy Policy describes the ways we may obtain, collect, use, secure, and share Personal Information.

By using these Products and Services, you accept this Privacy Policy and ZingBox’s **End User License Agreement** [<https://www.zingbox.com/wp-content/uploads/2017/06/EULA.pdf>], which is hereby incorporated. You also agree that, where required by law, you have provided notice to or obtained consent from others using your ZingBox-monitored network. If you do not agree with these policies, do not use the Products and Services or visit the Sites.

### **Changes and Updates to This Privacy Policy**

ZingBox may revise this Privacy Policy from time to time. We will post any changes on this page and update the date at the top, so be sure to check back periodically to stay aware of any modifications. In the event of a material change to the Privacy Policy, we will also notify users that have established a user account with us (each, an “**Account**”) of such change via email at the email address provided for in your Account. Your continued use of the Sites, Products and Services after changes have been posted will constitute your acceptance of this Privacy Policy and any changes.

## **INFORMATION WE COLLECT**

### **Information You Provide**

ZingBox may ask for and collect from Browsers and Account Holders personally identifiable information at various points throughout the Sites, Account creation, and your use of the Products and Services. We

may ask for an Account Holder's name, email address, mailing address, phone number, company name, and similar information. ZingBox collects and uses the information Account Holders provide to us when using the Products and Services. When Account Holders create an Account with us using the Application or Sites, Account Holders will be asked to grant ZingBox access to the Account Holder's network or the network belonging to the Account Holder's legal entity for which he or she has the right, power, and authority to enter into this agreement and permit such access. We also may collect information when we receive an email message from you or when Account Holders access his or her Account.

### **Automatically Collected Information**

In order to provide the best possible Services, to allow us to make certain internal and aggregate external reports for service improvement and security purposes, and to make recommendations, we automatically collect information about Browsers' use of the Sites, Account Holder's use of the Application and Connected Users' traffic on an Account Holder's network, including but not limited to metadata packet information and log file information such as Internet protocol (IP) addresses, device identifiers and names, browser type and language, referring / exit pages and URLs, platform type, domain names, file sizes, and protocol information. ZingBox will provide this information to the Account Holder, who may view and use this information. ZingBox will take steps to anonymize such information before any third party other than the Account Holder is able to view it. ZingBox's Products and Services may also integrate with other products or software deployed by the Account Holder to obtain additional information, including but not limited to device location information to provide additional security analytics. We may also automatically collect the date, time, and locations when devices connect to or otherwise act on an Account Holder's network, which we will use for purposes such as security analysis.

While we may collect or log this information, we do not seek to identify a Browser or Connected User or match this information with individuals.

### **Cookies and Other Online Tracking Technologies**

ZingBox also may automatically collect information about how Browsers use the Sites and may use cookies or other similar technologies to help use and compile statistics. This information may include log file information such as Internet protocol (IP) addresses, browser type, browser language, pages viewed, and the date and time of a visit. This information helps us improve the functionality of the Sites.

#### *Third Party Advertising Cookies*

We may allow third parties, like ad networks and servers, to serve customized ads to Browsers, which includes permission to access their own cookies or other tracking technologies on your computer or mobile phone that you use to access the Sites. We do not have access to information collected by these third parties, nor does this Privacy Policy govern the use of third party cookies or similar technology. If you do not wish to receive these tailored advertisements, you can visit the [Network Advertising Initiative's](#) website, the [Digital Advertising Alliance's](#) website, and Google's [Ads Preference Manager](#) to learn more information about tailored browser advertising and how you can control cookies or opt out

from such services.

### *Do Not Track Signals*

Our Sites do not respond to web browser “do not track” signals.

### **How We Use This Information**

ZingBox will use this information to process and respond to inquiries, requests, and for the network security purposes for which we collected the information, such as to process security analytics and for system administration and internal reporting purposes. We will use the information collected from Connected Users through our Products and Services, including but not limited to location, device identifiers, and IP addresses, to provide Account Holders with the cybersecurity Products and Services and integration with other products and software deployed by the Account Holder (i.e., integrating device information and security alerts to the Account Holder’s Security Event and Log System). We may use Account Holder Personal Information to operate, maintain and provide Account Holders the features and functionality of the Products and Services. We also may use an Account Holder’s name, email address and other information on our system to notify an Account Holder of updates to the Services and other matters, to authenticate Account Holders, to solicit Account Holder feedback and input on the Products and Services, as well as to provide Account Holders with personalized information about other Products and Services we feel may be of interest to you, including but not limited to new Product or Service releases. For special offers and promotions, we will provide all subscribers with an opportunity to unsubscribe from receiving further similar communications.

We may also use non-personal, de-identified data in our research to improve our Products and Services and for marketing or other commercial purposes.

### **How We May Share This Information**

We share your Personal Information with our employees, affiliates, third party service providers and joint business partners as required to provide you the Products and Services you request and respond to your enquiries. This includes, but is not limited to, service providers who assist us with product fulfillment, customer support, billing and credit verification and other processing of transactions, or other account maintenance.

ZingBox may also share your information in the following ways:

- To enforce our rights arising from any contracts entered into between you and ZingBox;
- To protect ZingBox’s rights or property or the safety of ZingBox, our employees, or others;
- To comply with any court order, legal process, or respond to any governmental or regulatory request; and
- To transfer information in the event of a merger, transfer of assets or other organizational restructuring.

We may also share non-personal, anonymous and/or aggregate information combined with the information we collect from Connected Users, other Account Holders and their Connected Users, or other sources with third parties for commercial or research purposes. This anonymous and/or aggregate information will be not associated with the Account Holder name or any other identifying information.

ZingBox may process your information on servers located in the United States. To the extent that an Account Holder is using ZingBox Products and Services from a foreign jurisdiction, the Account Holder consents to the transfer of all collected network information to the United States. **IF IT IS UNLAWFUL TO USE ZINGBOX PRODUCTS AND SERVICES IN YOUR JURISDICTION OR TO TRANSFER YOUR DATA TO THE UNITED STATES, DO NOT USE OUR PRODUCTS AND SERVICES.**

### **Third Party Websites**

Our Sites may contain links to other websites provided by third parties. Please be aware that we do not control these third party websites or any of the content contained on those websites. Once you have left our Sites, we cannot be responsible for the privacy practices of such other websites. We encourage you to exercise caution and to read the privacy policy for the website you visit. The inclusion of hyperlinks to third party websites on our Sites in no way constitutes an endorsement by us of such websites' content, actions or policies.

### **Security**

ZingBox is committed to maintaining your confidence and trust and takes steps to help protect the personal information you provide to us. However, no transmission or electronic storage of information is guaranteed to be secure. We therefore urge you to always use caution when transmitting information over the Internet.

### **Children**

The Sites, Products and Services are not directed toward children under 13 years of age nor does ZingBox knowingly collect information from children under 13. **IF YOU ARE UNDER 13, PLEASE DO NOT USE THE SITES OR PRODUCTS AND SERVICES TO SUBMIT ANY PERSONALLY IDENTIFIABLE INFORMATION TO ZINGBOX.**

### **Your California Privacy Rights**

California's "Shine The Light" law permits California residents to annually request and obtain information free of charge about what personal information is disclosed to third parties for direct marketing purposes in the preceding calendar year.

### **Contact Us**

If you have any questions, concerns, or suggestions regarding this Privacy Policy, or to update any information you have provided us, please send us an email at [privacy@zingbox.com](mailto:privacy@zingbox.com).