

**VAROS CORPORATION**  
**PRIVACY POLICY**

This Privacy Policy explains how Varos Corporation ("**Varos**" or "**we**", "**our**", "**us**") collects, uses, shares, protects, and, under certain circumstances, discloses, your information that you provide during the course of your use of our website (the "Site"), or your use of our services or our Site (the "Services").

We are committed to protecting and respecting your privacy and any information that you may provide to us. Please read this Privacy Policy carefully Site and review it periodically for the latest information about our privacy practices. By visiting our Site or using our Services, you fully agree to the terms of this Privacy Policy.

BY USING OUR SERVICES OR VISITING OUR SITE OR SUBMITTING INFORMATION THROUGH THE SERVICES OR VIA OUR SITE, YOU EXPRESSLY CONSENT TO THE COLLECTION, PROCESSING, AND USE OF YOUR INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY, INCLUDING THE COLLECTION, USE, DISCLOSURE, STORAGE, TRANSFER AND PROCESSING OF YOUR INFORMATION, INCLUDING YOUR PERSONAL INFORMATION, AS DESCRIBED HEREIN. YOUR INFORMATION, INCLUDING YOUR PERSONAL IDENTIFIABLE INFORMATION, MAY BE PROCESSED IN THE COUNTRY WHERE IT WAS COLLECTED AS WELL AS IN OTHER COUNTRIES WHERE LAWS REGARDING THE PROCESSING OF INFORMATION, INCLUDING PERSONAL INFORMATION, MAY BE LESS STRINGENT THAN THE LAWS IN YOUR COUNTRY.

**IF YOU DO NOT AGREE WITH OUR PRIVACY POLICY, PLEASE DO NOT USE OUR SITE OR OUR SERVICES.**

We obtain and use Information in accordance with this Privacy Policy. We will ask for your consent before using Personal Information in a manner other than as set out in this Privacy Policy.

**YOUR INFORMATION**

**Information covered by this Policy**

For purposes of this Privacy Policy, our use of the term "Information" means any and all information we receive from or about you. This may include (without limitation) information collected from you directly or indirectly, manually or otherwise, or via electronic, automatic or other means, including (without limitation) via stationary, mobile or any other devices. Such information may include information (i) which you provide during the course of your use of the Site, or your use of our Services; (ii) collected about you, your business, and the technology you are using, and (iii) which we receive about you from third parties or other sources.

**Types of Information**

Information is divided into two distinct categories:

- "Non-Personal Information" means Information which does not personally identify a person.
- "Personal Information" means Information related to a natural person that can be used to directly or indirectly identify the person, such as names, addresses, e-mail addresses, and phone numbers, as well as other non-public information that is associated with the foregoing.

**HOW WE OBTAIN INFORMATION**

**We collect Information when you visit our Site**

You may provide us with your Information voluntarily. For example, we collect Personal Information that you give us by filling in forms, using our Services, contacting us, setting up an account with us, or by contacting us by phone, email or other means; and that we learn about you from our business interactions, communications, and dealings with you.

We also collect Personal Information automatically when we receive and store certain types of information automatically when you interact with the Site or use the Services.

**We process Information you provide to us when you submit an inquiry on the Site.**

When using the Site, you can submit an inquiry via email. When contacting us, you will be asked to provide information such as your name, email address, phone number, state, organization and the subject and content of your inquiry. We refer to this data as **"Inquiry Information"**.

**We collect and process your information when you register to the Services.**

When you register to use our Services, we will ask you to provide us with your contact details such as your full name, email and organization. We refer to this data as **"User Account Information"**.

*You do not have a legal obligation to provide us with your Inquiry Information or User Account Information. However, if you choose to not share this information with us, we may not be able to respond to your inquiry or allow you to access the Services.*

**We also collect analytics information about your use of the Site.**

When you use the Site, we record and collect certain information about your interaction with the Site, including the IP address from which you access the Site, time and date of access, type of browser used, language used, links clicked, and actions taken while using the Site (**"Analytics Information"**).

We use this Personal Information to administer our Site, to measure the efficiency of our systems, and to undertake an analysis on the locations from which people access our webpages.

We also collect Information about your visit and your behaviour on our Site. This may include the website you visit before and after visiting our Site (including date and time), time and length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, traffic data, location data, weblogs and other communication data and information provided when requesting further service or downloads.

## HOW YOUR INFORMATION IS USED

**Use of Non-Personal Information**

Non-Personal Information may be collected, processed, and used in accordance with applicable law for any and all purposes we deem fit. Generally, the information Varos collects is used only for our own internal purposes, for example, to improve the Services and the Site, to improve our marketing and promotional efforts, to improve customer service, and to improve content and Site offerings, and may also be used by us to contact you to provide you with information which we believe may be useful to you. We believe that these uses allow it to improve the Services and our Site and to better tailor them to meet customers' needs.

**To respond to and handle your inquiry.**

We will use your Inquiry Information to contact you about your inquiry and handle your inquiry.

**To provide and maintain the Services.**

We will use your User Account Information to provide, maintain and improve your user experience when using the Services; to send you communications and administrative emails and to provide users with further information and updates with regards to the Site and the Services.

**We will use your Analytics Information for enhancing and developing the Site.**

We will use the Analytics Information for quality assurance and for development and enhancement of the Site. We also use the Analytics Information to adapt the Site, its content, and our services to users' preferences. In addition, we will use the Analytics Information to prevent fraud, resolve disputes, troubleshoot problems, assist with any

investigations, enforce the Terms of Use, establishing your use of the Site, and take other actions otherwise permitted by law.

**Marketing Activities.**

We may collect and use your Personal Information for undertaking marketing by email telephone and mail. We may send you certain marketing communications (including electronic marketing communications to existing customers) if it is in our legitimate interests to do so for marketing and business development purposes.

We will always obtain your consent to direct marketing communications where we are required to do so by law (for example, if you have provided a personal email address to us) and if we intend to disclose your Personal Information to any third party for such marketing.

**Summary of Potential Uses of Information.**

In general, Personal Information you submit to us, or that is obtained by us, is used:

- to create and manage the business relationship,
- to provide and support our services to the organization you represent,
- to improve our Services,
- to communicate with you about our Services,
- to send you notifications regarding your use of the Services or the Site,
- to send you notifications by various means, including regular mail, email, telephone, including voicemail, or SMS (text message)
- to respond to requests that you make,
- to bill you, to resolve fee disputes and for other associated billing services,
- to further new services or products,
- to operate, maintain, and improve the features, functionality, and performance of our Site and Services,
- to comply with our legal obligations;
- to comply with our regulatory obligations;
- to monitor compliance with our contractual terms of use;
- to better understand our customers and the way they use and interact with our Site and our Services;
- to enhance security, prevent fraud or market abuse, monitor and verify identity or service access, combat spam or other malware or security risks;
- to deliver targeted marketing and service update notices;
- to facilitate events we participate in and communicate with you about those;
- to enforce our agreements with third parties;
- to protect our business and to enforce and exercise our rights.

**Use of anonymized Information.**

We may create anonymized information from Personal Information by excluding information that makes the information personally identifiable to you. We may use this anonymized information for internal purposes, such as analyzing usage patterns, so that we may enhance the Site and Services, and we also reserve the right to use and disclose such anonymized

information at our discretion to third parties. Such anonymized information may be deemed to be Non-Personal Information and used accordingly.

## WHO WILL PROCESS YOUR INFORMATION

*We will not share your Personal Information with third parties, except in the events listed below or when you provide us your explicit and informed consent.*

**We will share your Personal Information with our service providers helping us operate the Site and our business.**

We may share your Personal Information with our service providers who assist us with the internal operations of the Site and our business. These companies are authorized to use your Personal Information in this context only as necessary to provide these services to us and not for their own promotional purposes.

**We will share your Personal Information with your organization.**

We may share your Inquiry and User Account Information with the organization for which you work.

**We will share your Personal Information with competent authorities, if you abuse your right to use the Site, or violate any applicable law.**

If you have abused your rights to use the Site, or violated any applicable law, we may share your Personal Information with competent authorities and with third parties (such as legal counsels and advisors), for the purpose of handling of the violation or breach.

**We will share your information if we are legally required to do so.**

If we are required to disclose your information by a judicial, governmental or regulatory authority.

**We will share your information with third parties in any event of change in our structure.**

If the operation of the Site or our business is organized within a different framework, or through another legal structure or entity (such as due to a merger or acquisition), we will share your information only as required to enable the structural change in the operation of the Site or our business.

## COOKIES

**What are cookies?**

Cookies are text files, comprised of small amount of data, that are saved on your computer or other device (e.g. smartphone, tablet, etc.) when you use the internet and visit various websites.

The information that the cookies maintain is read by the website you visit, during the session of your visit to the website (these are called 'session' cookies), and when you return to visit it again (these are called 'persistent' cookies). We may also use techniques called web beacons and web pixels for purposes similar to the use of cookies.

We use cookies and other web technologies on the Site to help us collect and store some of the information described above and to enable the functionality of the Site.

For more information about Cookies and how we use them, please visit our [Cookies Policy](#).

## SECURITY AND DATA RETENTION

**We will retain your Information for as long as we need it to support our business activities, and thereafter as**

We will retain your Inquiry Information and User Account Information for the duration needed to support our ordinary business activities operating the Site and providing the Services to your organization. Thereafter, we will still retain your Personal Information as necessary to comply with our legal obligations, resolve disputes, establish and defend legal claims and enforce

**needed for record-keeping matters.** our agreements.

**We implement measures to secure your Information.** We implement measures to reduce the risks of damage, loss of information and unauthorized access or use of Information. However, these measures do not provide absolute information security. Therefore, although efforts are made to secure your Personal Information, it is not guaranteed, and you cannot expect that the Site will be immune from information security risks.

## INTERNATIONAL DATA TRANSFERS

**We will internationally transfer your Information only in accordance with applicable data protection laws.** If we transfer your Personal Information for processing at locations outside your jurisdiction, we will abide by data transfer rules applicable to these situations.

If you are an EU resident and we transfer your Personal Information from within the European Union to locations outside the European Union, we will do so by using adequate safeguards determined by the GDPR.

## ADDITIONAL INFORMATION FOR INDIVIDUALS IN THE EU

**Legal basis for processing your personal data.** In general, we use your Personal Information when necessary (a) to perform our obligations under any contract with you; (b) to comply with our legal obligations (for example, complying with our legal and regulatory obligations); and (c) for our legitimate interests or the legitimate interests of others (for example, to ensure the security of our Site or Services). If we rely on our (or another person's) legitimate interests for using your Personal Information, we will undertake a *balancing test* to ensure that our (or the other person's) legitimate interests are not outweighed by your interests or fundamental rights and freedoms which require protection of the Personal Information.

The legal basis for processing your Analytics Information is our legitimate interest in providing, maintaining, developing and enhancing the Site and the Services.

The legal basis for collecting and processing your Inquiry Information is our legitimate interests in responding to your inquiry.

The legal basis for collecting and processing your User Account Information is the performance of our legitimate interest in fulfilling our contract with your organization to provide you with access to our Site and Services.

The legal basis for processing your data for the purpose of handling instances of abusive use of the Services is our legitimate interests in defending and enforcing against violations and breaches that are harmful to our business.

The legal basis for processing your data where we are legally required to share it, is our legitimate interests in complying with mandatory legal requirements imposed on us.

The legal basis for our processing your data in the event of a change in our corporate structure is our legitimate interests in our business continuity.

**You have certain rights to access, update or delete your information, obtain a copy of your information, withdraw your consent and object or restrict certain data processing activities.** If you are in the EU, you have the following rights under the GDPR:

**Right to Access** your personal data that we process and receive a copy of it.

**Right to Rectify** inaccurate personal data we have concerning you and to have incomplete personal data completed.

**Right to Data Portability**, that is, to receive the personal data that you provided to us, in a structured, commonly used and machine-readable

format. You have the right to transmit this data to another service provider. Where technically feasible, you have the right that your personal data be transmitted directly from us to the service provider you designate.

**Right to Object**, based on your particular situation, to using your personal data on the basis of our legitimate interest. However, we may override the objection if we demonstrate compelling legitimate grounds, or for the establishment, exercise or defense of legal claims.

**Right to Restrict** the processing your personal data (except for storing it) if you contest the accuracy of your personal data, for a period enabling us to verify its accuracy; if you believe that the processing is unlawful and you oppose the erasure of the personal data and request instead to restrict its use; if we no longer need the personal data for the purposes outlined in this Policy, but you require them to establish, exercise or defense relating to legal claims, or if you object to processing, pending the verification whether our legitimate grounds for processing override yours.

**Right to be Forgotten**. Under certain circumstances, such as when you object to us processing your data and we have no compelling legitimate grounds to override your objection, you have the right to ask us to erase your personal data. However, we may still process your personal data if it is necessary to comply with a legal obligation that we are subject to under laws in EU Member States or for the establishment, exercise or defense of legal claims.

If you wish to exercise any of these rights, contact your organization, which is the controller of your personal information.

If you wish to exercise these rights with regards to the Analytical Information, contact us at [support@varos.io](mailto:support@varos.io).

We reserve the right to ask for reasonable evidence to verify your identity before we provide you with information. Where we are not able to provide you with information that you have asked for, we will explain the reason for this.

**You have a right to submit a complaint to the relevant supervisory data protection authority.**

Subject to applicable law, you have the right to lodge a complaint with your local data protection authority. If you are in the EU, then according to Article 77 of the GDPR, you can lodge a complaint to the supervisory authority, in particular in the Member State of your residence, place of work or place of alleged infringement of the GDPR. For a list of supervisory authorities in the EU, click [here](#).

## MINORS

**The Site is not directed to individuals under 18.**

The Site is not directed to users under the age of 18. We do not knowingly collect information or data from children under the age of 18 or knowingly allow children under the age of 18 to use the Site.

## CHANGES TO THIS PRIVACY POLICY

**If we change this Policy, we will post a new version .**

We may change this Privacy Policy at any time by posting a new version on this page or on a successor page. The new version will become effective on the date it is posted. We reserve the right to modify this Privacy Policy at any time, and you agree that your continued use of our Services or our Site shall constitute your acceptance of any modifications to such Privacy Policy, so please review it frequently.

## CONTACTING US AND OPTING OUT

**Our contact information.**

If you wish to exercise any of your rights in relation to your Personal Information, including exercising your opt-out rights, please send us an email at [support@varos.io](mailto:support@varos.io)

If you have any questions regarding our Privacy Policy or the collection or use of your Information, please contact us at [support@varos.io](mailto:support@varos.io).

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