

Introduction

Data Systems International, Inc. dba Cloud Inventory[®] ("Cloud Inventory", "we", or "us") respects your preferences concerning the collection and use of your Personal Information. This Cloud Inventory Privacy Policy ("Policy") lets you know how we collect and use your Personal Information, how you can control its use, and describes our practices regarding information collected from the different Cloud Inventory sites that link or refer to this Policy (such as our websites, computer or mobile software applications, social media pages and HTML-formatted e-mail messages), as well as through offline sales and marketing activities (collectively, the "Channels").

Scope of this Privacy Policy

This Policy does not apply to the personal data we process as a processor or service provider on behalf of our customers. If you have questions regarding your personal information or wish to exercise your rights pertaining to said data where a Cloud Inventory customer is the controller, please contact our customer directly. We are not responsible for the privacy or data security practices of our customers, which may differ from those explained in this Policy.

We provide important information for individuals in the European Union, the European Economic Area or the United Kingdom in the "Notice to European Users" section, below.

Personal Data We Collect

We may collect the following categories of personal data about you:

- **Contact data**, such as first and last name, title, email address, business phone number, and mailing address.
- **Company details**, such as the name of your company, country, and region.
- Account information, such as your username, password, and profile information.
- **Communications** that we exchange, including when you contact us with questions, feedback, or otherwise.
- **Payment and transactional information**, such as the information needed to complete any services you purchase on or through the Service (including name, credit card information, bank account number, billing and shipping information), and information about services you have used or purchased from us.

- **Marketing preferences**, such as your preferences for receiving communications about our products, services, activities, events, and publications, and details about how you engage with our communications.
- **Device data**, such as your computer or mobile device operating system type and version number, manufacturer and model, browser type, screen resolution, IP address, unique identifiers, the website you visited before browsing to our website, and general location information such as city, state or geographic area.
- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and duration of access.
- **Other information** that we may collect which is not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

We may collect this information from a variety of sources:

- **Personal Data you Provide to Us.** You may provide your personal data through our Contact Sales or Become a Partner forms on our website, by contacting us directly using our Contact Us information, by providing a physical copy of your personal data in meeting with Cloud Inventory staff, or otherwise.
- **Data Providers.** We may receive personal data, such as your business contact information, from third party providers.
- **Business Partners.** A Cloud Inventory business partner may provide us with your personal data, such as your business contact information.
- **Colleagues.** Other individuals at your organization may provide us with your business contact information and other personal data, such as during the account registration process.
- Automatic Collection. If you use and interact with the Service, we and our service providers or partners may automatically collect your personal data, including the device data and online activity data described above. Like many online companies, we use cookies and similar technologies to facilitate some of our automatic collection. See our Cookie Policy for more information.

In some cases, we may combine the information you have provided with the other sources listed above.

Cloud Inventory Applicants

If you are a Cloud Inventory applicant we collect information to manage our relationship with you from the point you submit an application to work with us through termination. The information we collect about you includes:

- Application information (resumes or curriculum vitae (CV), education transcripts)
- Basic personal information (i.e. name, birth date)
- Contact details (email, phone number, address)
- Employment Eligibility Information (social security number, work permits, passport and visa)
- Background check information (address history, driver's license information, background check results
- Information required to comply with applicable anti-discrimination or diversity legislation (race and gender)
- Job Performance Information

We collect this information from a variety of sources:

- From you in the process of applying for job or in context of your role as an employee or contractor.
- From third party service providers or vendors that support Cloud Inventory's hiring and staff management processes.
- From other third parties, such as the references you provide when submitting a job application.

How We Use Your Personal Data

We use your personal data for various purposes, including for the purposes below and as otherwise described in this Privacy Policy or at the point of collection:

To Provide Our Products and Services. We may use your personal data:

- To respond to inquiries you made regarding becoming a partner or customer. These responses can include information about our products and services and the steps for furthering a business relationship.
- To identify and assess your organization as a potential customer and partner opportunities and mutually determining whether or not to proceed with a contractual relationship.
- To review compliance with applicable usage terms in your organization's contract.
- To facilitate communications and resolution of your support cases involving the use of Cloud Inventory services.
- To diagnose technical problems.
- To facilitate your enrollment, attendance and completion of Cloud Inventory offered education or training events.

- To process and collect payments for the use of Cloud Inventory services as necessary to perform our contract with your organization.
- To process and provide payments to you as a vendor contact for products or services your organization provides to Cloud Inventory.

To Provide Cloud Inventory Online Community. If you chose to participate in Cloud Inventory Communities, will collect personal data you provide to create your profile for the communities.

To Process Job Applications. If you are an applicant, we may use your personal data to process your job application, coordinate interviews, verify employment eligibility, and process background checks.

For Research and Development. We may also use personal data to conduct research and analysis, such as to improve the Service or our products and services, to understand and analyze the usage trends and preferences of our users, and to develop new features, functionality, and services.

To Create Anonymous Data. We may create aggregated, de-identified, or other anonymous data from personal information we collect. We make personal information into anonymous data by removing information that makes the data personally identifiable to you. We may use this anonymous data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

For Marketing and Advertising. We, our business partners and our third party advertising partners may collect and use your personal data for direct marketing and interest-based advertising purposes.

Direct Marketing. We may send you Cloud Inventory-related or other direct marketing communications as permitted by law. You may opt-out of our marketing communications as described in the "Opt-Out of Marketing Communications" section below.

Interest-Based Advertising. We also contract with third-party advertising companies and social media companies to display ads on our Service and other sites. These companies may use cookies and similar technologies to collect information about you (including the device data and online activity data described above) over time across our Service and other sites and services or your interaction with our emails, and use that information to serve ads that they think will interest you. You can learn more about your choices for limiting interest-based advertising, in the "Advertising Choices" section below.

To Comply with Laws and Regulations. We use your personal data as we believe necessary or appropriate to comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities. For Compliance, Fraud Prevention, Safety. We may use your personal data and disclose it to law enforcement, government authorities, and private parties as we believe

necessary or appropriate to: (a) maintain the safety, security, and integrity of our Service, products and services, business, databases and other technology assets; (b) protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims); (c) audit our internal processes for compliance with legal and contractual requirements and internal policies; (d) enforce the terms and conditions that govern the Service; and (e) prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft. **With Your Consent**. In some cases we may specifically ask you for your consent to collect, use, or share your personal data, such as when required by law.

Disclosure of Personal Data

We may share your personal data as follows or as otherwise described in this Privacy Policy or at the point of collection:

- Service Providers. With our contracted service providers who provide services on our behalf. These service providers or vendors may use data we provide them only as instructed by Cloud Inventory.
- **Cloud Inventory Partners.** With the Cloud Inventory partners for the purpose of establishing sales, consulting services, implementation and support services conducted by our partner for your organization. We will only provide this information to a partner after obtaining prior permission from your organization.
- **Authorities and Others.** In situations where we have a good faith belief that disclosure of your personal data is necessary to:
 - comply with legal requirements or processes;
 - protect and defend our rights and property;
 - o enforce terms and conditions of contracts or other agreements;
 - o protect the interests of our users and others; and
 - carry out the activities described above in the section above titled "For Compliance, Fraud Prevention, and Safety."
- **Business Transferees.** In a situation where we are involved in a business transaction (or potential transaction) involving a merger, acquisition by another company, sale of all or a portion of our assets, financing, consolidation, reorganization, divestiture, or dissolution of all or a portion of our business (including in connection with a bankruptcy or similar proceedings).
- **Professional Advisors**. We may share your personal data with our professional advisors, such as lawyers, auditors and insurers, where necessary in the course of the professional services that they render to us.

- **Related Companies**. We may share your personal data with companies that are affiliated with us (that is, that control, are controlled by, or are under common control with Cloud Inventory).
- Advertising Partners. We may also share personal data collected about you with third parties that collect information about your activity on the Service and other online services to help us advertise our products and service, and/or use hashed customer lists that we share with them to deliver ads to you and to similar users on their platforms.

Your Choices

You can make the following choices with respect to your personal information:

- **Update Account Information**. If you have an account with us, you may review and update certain account information by logging into Cloud Inventory and updating your information.
- **Opt-Out of Marketing Communications**. You may opt out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by contacting us at <u>compliance@cloudinventory.com</u>. You may continue to receive service-related and other non-marketing emails.
- **Cookies**. Most browsers let you remove and/or stop accepting cookies from the websites you visit. To do this, follow the instructions in your browser's settings. For more details, see the "Your Choices" section of our **Cookie Policy**.
- Advertising Choices. You may opt-out of interest-based advertising. For more details, see the "Your Choices" section of our Cookie Policy .
- **Do Not Track**. Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" or similar signals. To find out more about "Do Not Track," please visit http://www.allaboutdnt.com.
- **Declining to Provide Information**. We need to collect personal data to provide certain services. If you do not provide the information requested, we may not be able to provide those services.

Security

The security of your Personal Information is very important to Cloud Inventory. We use physical, electronic, and administrative safeguards that are designed to protect your Personal Information from loss, misuse and unauthorized access, disclosure, alteration and destruction.

No method of storage or transmission of data can be guaranteed or is fully secure. While we use reasonable efforts to protect your personal information from the risks presented by unauthorized access or acquisition, we cannot guarantee the security of your personal information. You are responsible for maintaining the security of your username and password or other forms of authentication, limiting access to your devices and signing out of websites and application after your sessions.

International Transfers of Personal Information

Cloud Inventory is based in the United States of America. If you are from a country outside of the United States of America with laws governing data collection, use, and disclosure that may differ from U.S. law and you provide personal information to us, please note that any personal information that you provide to us may be transferred to the United States of America. By providing your personal information, where applicable law permits, you hereby specifically and expressly consent to such transfer and processing and the collection, use, and disclosure set forth herein or in any applicable terms of service.

Other Sites and Services

The Service may contain links to other websites and online services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. In addition, our content may be included on web pages or online services that are not associated with us. We do not control third party websites or online services, and we are not responsible for their actions. Other websites and services follow different rules regarding the collection, use and sharing of your personal information. We encourage you to read the privacy policies of the other websites and online services you use.

Children

As a company focused on serving the needs of businesses, Cloud Inventory's Channels are not directed to minors and Cloud Inventory does not promote or market its services to minors. If you are a parent or guardian and believe that we have mistakenly or unintentionally collected Personal Information of your child through our Channels without appropriate consent, please notify us via email at compliance@nextworld.net so that we may immediately delete the information from our servers and make any other necessary corrections. Additionally, please contact us via email at compliance@nextworld.net to request removal of content or information that was posted to our Channels when the registered user was under the age of 16. Please note that such requests may not ensure complete or comprehensive removal of the content or information, as, for example, some of your content may have been reposted by another user.

Changes to this Privacy Policy

Cloud Inventory may amend or revise this Privacy Policy from time to time at our discretion. If we do, we will post the changes to this Privacy Policy and update the effective date at the top of this Privacy Policy. We may also provide a notice on the website or by contacting you directly of updates or changes where required by law. In all cases, continued use of the Service shall constitute acceptance of the new Privacy Policy.

We encourage to periodically review this Privacy Policy to stay informed about our privacy practices.

Contacting Us

If you have questions about this Privacy Statement, please email us at <u>compliance@cloudinventory.com</u>.

Notice to European Users

The information provided in this "Notice to European Users" section applies only to individuals in the European Union, the European Economic Area or the United Kingdom (collectively, "**Europe**").

Personal Data

Except as otherwise specified, references to "personal data" in this Privacy Policy are equivalent to "personal data" governed by European data protection legislation.

Controller

The controller of your personal information covered by this Privacy Policy for purposes of European data protection legislation is Cloud Inventory, 11101 Switzer Road, Suite 300, Overland Park, KS 66210, USA

Legal Bases for Processing

The legal bases of our processing of your personal information as described in this Privacy Policy will depend on the type of personal information and the specific context in which we process it. However, the legal bases we typically rely on are set out in the table below. We rely on our legitimate interests as our legal basis only where those interests are not overridden by the impact on you (unless we have your consent or our processing is otherwise required or permitted by law). If you have questions about the legal basis of how we process your personal information, contact us at compliance@cloudinventory.com.

Processing Purpose (See the "How We Use Your Personal Data" section above for details about each processing purpose)	Legal Basis
To Provide Our Products and Services	Processing is necessary to perform the contract governing our operation of the Site or the provision of the Service, or to take steps that you request prior to engaging our services. Where we cannot process your personal data as required to operate the Service on the grounds of contractual necessity, we process your personal information for this purpose based on our legitimate interest in providing you with the products or services you access and request.
For Marketing and Advertising	Processing is based on your consent where that consent is required by applicable law. Where such consent is not required by applicable law, we process your personal information for these purposes based on our legitimate interests in promoting our business, and showing you tailored relevant content.
To process Job Application For Research and Development To Create Anonymous Data For Compliance, Fraud Prevention and Safety.	These activities constitute our legitimate interests.
To Comply with Laws and Regulations	Processing is necessary to comply with our legal obligations.
With Your Consent	Processing is based on your consent. Where we rely on your consent you have the right to withdraw it any time in the manner indicated when you consent or in the service.

Use For New Purposes

We may use your personal information for reasons not described in this Privacy Policy where permitted by law and the reason is compatible with the purpose for which we collected it. If we need to use your personal information for an unrelated purpose, we will notify you and explain the applicable legal basis.

Sensitive Personal Information

Unless we specifically request it, we ask that you not provide us with any sensitive personal information (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Service, or otherwise to us.

Retention

We will retain your personal data for as long as necessary to fulfill the purpose of collection, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish and defend legal claims, for fraud prevention purposes, or as long as required to meet our legal obligations.

At the end of the applicable retention periods, your personal data will be deleted or anonymized. If for technical reasons we are unable to delete data entirely from our systems, we will implement appropriate measures to prevent any further use of such data.

Your Rights

European data protection laws give you certain rights regarding your personal information. You may ask us to take the following actions in relation to your personal information that we hold:

- Access. Provide you with information about our processing of your personal information and give you access to your personal information.
- **Correct**. Update or correct inaccuracies in your personal information.
- **Delete**. Delete your personal information.
- **Transfer**. Transfer a machine-readable copy of your personal information to you or a third party of your choice.
- **Restrict**. Restrict the processing of your personal information.
- **Object**. Object to our reliance on our legitimate interests as the basis of our processing of your personal information that impacts your rights.

You may submit these requests by contacting us at <u>compliance@cloudinventory.com</u>. We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions. If you would like to submit a complaint about our use of your personal information or our response to your requests regarding your personal information, you may contact us or submit a complaint to the data protection regulator in your jurisdiction.

Cross-Border Data Transfer

If we transfer your personal information to a country outside of Europe such that we are required to apply additional safeguards to your personal information under European data protection laws, we will do so. Please contact us at <u>compliance@cloudinventory.com</u> for further information about any such transfers or the specific safeguards applied.