

**TOTANGO PRIVACY POLICY**

*Last Updated: March 1, 2021*

This privacy policy (“**Privacy Policy**”) governs how we, Totango, Inc. (together, “**Totango**” “**we**”, “**our**” or “**us**”) use, collect and store Personal Data we collect or receive from or about you (“**User**”, “**you**”) such as in the following use cases:

- (i) When you browse or visit our website, <https://www.totango.com/> (“**Website**”);
- (ii) When you make use of, or interact with, our Website
  - a. When you request a demo
  - b. When you sign up and/or login to our platform (“**Platform**”)
  - c. When you download a whitepaper or case study
  - d. When you submit a request for us to send you more information about the events and you choose to register to such events
  - e. When you register to one of our Webinars
  - f. When you subscribe to our email list
  - g. When we publish your testimonials
  - h. When we process your job application
  - i. When you contact us (e.g. customer support, when you submit a request or email or leave us a message)
- (iii) When you register to or attend a marketing event and provide us with Personal Data
- (iv) When you exchange business cards with us
- (v) When we acquire your Personal Data from third-party sources (such as lead-generation companies)
- (vi) When we use the Personal Data of our service providers and suppliers
- (vii) When we use the Personal Data of our customer(s) and end users
- (viii) When you interact with us on our social media profiles (e.g., Facebook, Instagram, Twitter, LinkedIn)

We greatly respect your privacy, which is why we make every effort to provide a website and platform that would live up to the highest of user privacy standards. Please read this Privacy Policy carefully, so you can fully understand our practices in relation to Personal Data. “**Personal Data**” means any information that can be used, alone or together with other data, to uniquely identify any living human being. Please note that this is a master privacy policy and some of its provisions only apply to individuals in certain jurisdictions. For example, the legal basis in the table below is only relevant for GDPR-protected individuals.

**Important note:** Nothing in this Privacy Policy is intended to limit in any way your statutory right, including your rights to a remedy or means of enforcement.

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This Privacy Policy can be updated from time to time and therefore we ask you to check back periodically for the latest version of the Privacy Policy, as indicated below. If there will be any significant changes made to the use of your Personal Data in a manner different from that stated at the time of collection, we will notify you by posting a notice on our Website or by other means.

**1. WHAT INFORMATION WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED**

<b>Data we collect</b>	<b>Why is the data collected and for what purposes?</b>	<b>Legal basis (GDPR only)</b>	<b>Third parties with whom we share your data</b>	<b>Consequences of not providing the data</b>
<i>When you browse or visit our Website</i>				
<b>Cookies, analytic tools and log files</b>  For more information, please read our cookies policy available at: <a href="https://www.totango.com/cookies-policy">https://www.totango.com/cookies-policy</a>	<b>Marketing, analytics, statistics, to improve our Website.</b>	<b>Consent</b>  Legitimate interest (e.g. essential cookies)	<b>3rd party platforms such as for the following purposes:</b>  Webflow.com- Website Cloud Hosting Services	<b>Cannot collect and store the information</b>  <b>Cannot use or access some parts of the Website</b>
<i>When you make use of, or interact with, our Website</i>				
<i>When you Request a Demo</i>				
Full name ● Email address ● Phone number ● Company name ● Title ● Country ●	To provide a demo ●	<b>Processing is necessary for the performance of a contract to which the data subject is party or in order to take</b>	<b>3<sup>rd</sup> party platforms such as for the following purposes:</b>	<b>Cannot provide a demo</b>

<ul style="list-style-type: none"> <li>• <b>Number of employees</b></li> <li>• Purchase timeline</li> <li>• Any other data that you decide to provide/supply us with</li> </ul>		<p><b>steps at the request of the data subject prior to entering into a contract</b></p> <p><b>Legitimate interest (e.g. to get in contact with you in order to set up a demo)</b></p>	<ul style="list-style-type: none"> <li>• Hubspot – Marketing Automation (such as filling out forms)</li> </ul>	
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> </ul>	<ul style="list-style-type: none"> <li>• To send you marketing communications</li> </ul>	<p><b>Consent</b></p>	<p><b>3<sup>rd</sup> party platforms such as for the following purposes:</b></p> <ul style="list-style-type: none"> <li>• Hubspot – Marketing Automation</li> <li>• Salesforce – CRM</li> </ul>	<p><b>Cannot send you marketing communications</b></p>
<i>When you sign up and/or login to our Platform</i>				
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Title / position at Company</li> <li>• Login details (e.g. Google, Salesforce, Single Sign On (SSO)) and password</li> <li>• Any other data that you decide to provide/supply us with</li> </ul>	<ul style="list-style-type: none"> <li>• To create an account</li> <li>• To allow you to sign up to the Platform</li> <li>• To identify you as a user</li> <li>• To grant you access to the Platform</li> <li>• To customize your experience</li> </ul>	<p><b>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</b></p> <p><b>Legitimate interest (e.g. to allow you to create an account)</b></p>	<p><b>3<sup>rd</sup> party platforms such as for the following purposes:</b></p> <ul style="list-style-type: none"> <li>• AWS- Cloud Hosting Services</li> <li>• Sendgrid – Generates email Campaigns via Totango</li> </ul>	<p><b>Cannot create an account</b></p> <p><b>Cannot allow you to sign up to the Platform</b></p> <p><b>Cannot identify you as a user</b></p> <p><b>Cannot grant you access to the Platform</b></p> <p><b>Cannot customize your experience</b></p>
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> </ul>	<ul style="list-style-type: none"> <li>• To share with you marketing materials and invitations to various events</li> <li>• To share with you information about product release</li> </ul>	<p><b>Consent</b></p>	<p><b>3<sup>rd</sup> party platforms such as for the following purposes:</b></p> <ul style="list-style-type: none"> <li>• Hubspot – Marketing Automation</li> <li>• Salesforce – CRM</li> </ul>	<p><b>Cannot share with you marketing materials and invitations to various events</b></p> <p><b>Cannot share with you information about product release</b></p>
<i>When you download a whitepaper or case study</i>				
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Company name</li> <li>• Title</li> <li>• <b>Number of employees</b></li> <li>• Country</li> </ul>	<ul style="list-style-type: none"> <li>• To download the whitepaper or case study</li> </ul>	<p><b>Legitimate interest (e.g. to respond to an inquiry sent by you)</b></p>	<p><b>3<sup>rd</sup> party platforms such as for the following purposes:</b></p> <ul style="list-style-type: none"> <li>• Hubspot – Marketing Automation (such as filling out forms)</li> <li>• Salesforce – CRM Solution, Sales Pipeline Management tool</li> </ul>	<p><b>Cannot download the whitepaper or case study</b></p>
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> </ul>	<ul style="list-style-type: none"> <li>• To share with you marketing materials (in accordance with your consent)</li> </ul>	<p><b>Consent</b></p>	<p><b>3<sup>rd</sup> party platforms such as for the following purposes:</b></p> <ul style="list-style-type: none"> <li>• Hubspot – Marketing Automation (such as filling out forms)</li> <li>• Salesforce – CRM Solution, Sales Pipeline Management tool</li> </ul>	<p><b>Cannot share with you marketing materials</b></p>
<i>When you submit a request for us to send you more information about the events and you choose to register to such events</i>				

<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Phone number</li> <li>• Company name</li> <li>• Title</li> <li>• <b>Number of employees</b></li> <li>• Country</li> </ul>	<ul style="list-style-type: none"> <li>• To answer your questions and provide you with more information about our events</li> <li>• To allow you to register to our events</li> </ul>	<p style="text-align: center;"><b>Consent</b></p> <p><b>Legitimate interest (e.g. respond to an inquiry sent by you)</b></p>	<p><b>3<sup>rd</sup> party platforms such as for the following purposes:</b></p> <ul style="list-style-type: none"> <li>• Hubspot – Marketing Automation</li> <li>• Salesforce – CRM Solution, Sales Pipeline Management tool</li> <li>• Bizzabo- Event Registration and Management tool</li> </ul>	<p><b>Cannot answer your questions and provide you with more information about our events</b></p> <p><b>Cannot allow you to register to our events</b></p>
<i>When you register to one of our Webinars</i>				
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Company</li> <li>• Company size</li> <li>• Title</li> <li>• Country</li> </ul>	<ul style="list-style-type: none"> <li>• To register you for one of our webinars</li> <li>• To send you more information about the webinar that you registered for, and/or to send you reminders.</li> </ul>	<p><b>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</b></p> <p><b>Legitimate interest (e.g. to register you for our webinar)</b></p>	<p><b>3<sup>rd</sup> party platforms such as for the following purposes:</b></p> <ul style="list-style-type: none"> <li>• Hubspot – Marketing Automation</li> <li>• Salesforce – CRM Solution, Sales Pipeline Management tool</li> <li>• Zoom.US- allows to broadcast video conference meeting to up to 10,000 attendees.</li> </ul>	<p><b>Cannot register you for one of our webinars</b></p> <p><b>Cannot send you more information about the webinar that you registered for, and/or to send you reminders</b></p>
<i>When you subscribe to our email list</i>				
<ul style="list-style-type: none"> <li>• Email address</li> </ul>	<ul style="list-style-type: none"> <li>• To add you to our mailing list and or/ our re-sellers mailing list</li> <li>• <b>To send you Sales and/or Marketing communications</b></li> </ul>	<p style="text-align: center;"><b>Consent</b></p>	<p><b>3<sup>rd</sup> party platforms such as for the following purposes:</b></p> <ul style="list-style-type: none"> <li>• Hubspot – Marketing Automation</li> <li>• Salesforce – CRM Solution, Sales Pipeline Management tool</li> <li>• Totango Re-sellers- such as SAP, MarketStar etc.</li> </ul>	<p><b>Cannot add you to our mailing list</b></p> <p><b>Cannot send you marketing communications</b></p>
<i>When we publish your testimonials</i>				
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Company name and Logo, to the extent that includes Personal Data</li> <li>• Message – Video - Comments</li> <li>• Any other data that you decide to provide/supply us with</li> </ul>	<ul style="list-style-type: none"> <li>• To process your review</li> <li>• To publish your review in our social media channels and/or Website(s).</li> </ul> <p><b>NOTE: We display personal testimonials of satisfied customers on our site in addition to other endorsements. With your consent we may post your testimonial along with your name. If you wish to update or delete your testimonial, you can contact us at <a href="mailto:privacy@totango.com">privacy@totango.com</a>.</b></p>	<p style="text-align: center;"><b>Consent</b></p> <p><b>Legitimate interest (e.g. to process your review)</b></p>	<p><b>3<sup>rd</sup> party platforms such as for the following purposes:</b></p> <ul style="list-style-type: none"> <li>• Google Drive- Data/Files Storage</li> <li>• YouTube-Online video-sharing platform. Totango organizes its video content for its audience on its YouTube channel.</li> </ul>	<p><b>Cannot process your review</b></p> <p><b>Cannot publish your review in our social media channels and/or Website(s)</b></p>
<i>When we process your job application</i>				
<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email address</li> <li>• Address</li> <li>• CV</li> <li>• LinkedIn profile</li> <li>• Cover letter</li> <li>• Message</li> </ul>	<ul style="list-style-type: none"> <li>• To process your job application</li> <li>• To assess you as a candidate</li> </ul>	<p><b>N/A since Totango does not have employees in EU.</b></p>	<p><b>3<sup>rd</sup> party platforms such as for the following purposes:</b></p> <ul style="list-style-type: none"> <li>• JazzHR-Applicant Tracking System designed to streamline</li> </ul>	<p><b>Cannot process your job application</b></p> <p><b>Cannot assess your suitability as a candidate</b></p>

<ul style="list-style-type: none"> <li>Any other data that you decide to provide/supply us with</li> </ul>			<p>Totango hiring process</p> <ul style="list-style-type: none"> <li>Hired.com- Online marketplace that matches teach talent with high-tech companies.</li> <li>Predictive Index-talent optimization software (behavioral assessment). This SW is not used in the first stages of hiring.</li> </ul>	
<p><i>When you contact us (e.g. customer support, when you submit a request or email or leave us a message)</i></p>				
<ul style="list-style-type: none"> <li>Full name</li> <li>Email address</li> <li>Message / comments / request</li> <li>Any other data that you decide to provide/supply us with</li> </ul>	<ul style="list-style-type: none"> <li>To process and answer questions</li> <li>To provide support (e.g., to solve problems or issues)</li> <li>To customize your experience</li> </ul>	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Legitimate interest (e.g. respond to an inquiry sent by you)</p>	<p>3<sup>rd</sup> party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> <li>MixMax- Email tracking &amp; Automation</li> <li>Salesforce- CRM Solution, Sales Pipeline Management tool</li> <li>Hubspot- Marketing Automation Tool (such as filling out forms)</li> <li>Zendesk- Support Tickets management. Tool</li> </ul>	<p>Cannot assist you and respond your query</p> <p>Cannot provide support</p> <p>Cannot customize your experience</p>
<p><i>When you register to or attend a marketing event and provide us with Personal Data</i></p>				
<ul style="list-style-type: none"> <li>Full name</li> <li>Company name</li> <li>Email address</li> <li>Phone number</li> <li>Any other data you decide to provide/supply us with</li> </ul>	<ul style="list-style-type: none"> <li>To establish a business connection</li> </ul>	<p>Consent</p> <p>Legitimate interest (e.g. send you more information about Totango in certain B2B situations)</p>	<p>3<sup>rd</sup> party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> <li>Hubspot- Marketing Automation Tool</li> <li>Salesforce- CRM Solution, Sales Pipeline Management tool</li> </ul>	<p>Cannot establish a business connection</p>
<p><i>When you exchange business cards with us</i></p>				
<ul style="list-style-type: none"> <li>Full name</li> <li>Company name</li> <li>Email address</li> <li>Phone number</li> <li>Any other data you decide to provide/supply</li> </ul>	<ul style="list-style-type: none"> <li>To establish a business connection</li> <li>To send you marketing communications</li> </ul>	<p>Consent</p> <p>Legitimate interest (certain B2B marketing communications)</p>	<p>3<sup>rd</sup> party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> <li>Hubspot- Marketing Automation Tool</li> <li>Salesforce- CRM Solution, Sales Pipeline Management tool</li> </ul>	<p>Cannot establish a business connection</p> <p>Cannot send you marketing communications</p>
<p><i>When we acquire your Personal Data from third-party sources (such as lead-generation companies)</i></p>				
<ul style="list-style-type: none"> <li>Contact details</li> </ul>	<ul style="list-style-type: none"> <li>To establish a business connection</li> <li>To send you marketing communications</li> <li>To generate insights on our marketing practices</li> </ul>	<p>Depending on the context, legitimate interest (B2B marketing), pre-contractual discussions or consent</p>	<p>3<sup>rd</sup> party platforms such as for the following purposes:</p> <ul style="list-style-type: none"> <li>Prospect (tryprospect.com)- B2B Lead Generation solution</li> </ul>	<p>Cannot establish a business connection</p> <p>Cannot send you marketing communications</p>

			Zoominfo- Data enrichment service •	
<i>When we use the Personal Data of our service providers and suppliers</i>				
<ul style="list-style-type: none"> <li>Full name</li> <li>Company name</li> <li>Email address</li> <li>Phone number</li> <li>Payment information, to the extent that it includes personal data</li> <li>Any other data you decide to provide/supply us with</li> </ul>	<ul style="list-style-type: none"> <li>To contact our service providers</li> <li><b>To perform the applicable agreement</b></li> <li><b>To pay our service providers and suppliers</b></li> </ul>	<ul style="list-style-type: none"> <li><b>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</b></li> <li><b>Legitimate interest (e.g. perform the contract, send contract-related communications)</b></li> </ul>	<ul style="list-style-type: none"> <li><b>3<sup>rd</sup> party platforms such as for the following purposes:</b></li> <li>Google Suite (Google Drive etc.)- Data and Files Storage •</li> </ul>	<ul style="list-style-type: none"> <li><b>Cannot contact our service providers</b></li> <li><b>Cannot perform the agreement</b></li> <li><b>Cannot pay our service providers and suppliers</b></li> </ul>
<i>When we use the Personal Data of our customer(s)</i>				
<ul style="list-style-type: none"> <li>Full name</li> <li>Email address</li> <li>Company name</li> <li>Address</li> <li>User name</li> <li>Title</li> <li>Contact Details</li> <li>Billing information</li> <li>Any other data you decide to provide/supply us with</li> </ul>	<ul style="list-style-type: none"> <li>To provide our products and services</li> <li>To perform our applicable service agreement</li> <li>To communicate with our customers/clients for contract-product related matters</li> </ul>	<ul style="list-style-type: none"> <li><b>Processing is necessary for the performance of a contract to which our customer is a party.</b></li> <li><b>Compliance with a legal obligation (e.g. tax laws, bookkeeping laws, etc.).</b></li> <li><b>Legitimate interest (e.g. send you contract-related communications)</b></li> </ul>	<ul style="list-style-type: none"> <li><b>3<sup>rd</sup> party platforms such as for the following purposes:</b></li> <li>AWS - Our Service is being hosted on AWS Cloud Hosting services •</li> <li>Sendgrid - generating Email Campaigns to our Customer's end users •</li> <li>Zendesk- Support tickets+ management platform •</li> </ul>	<ul style="list-style-type: none"> <li><b>Cannot provide the services and/or our products</b></li> <li><b>Cannot perform the agreement</b></li> <li><b>Cannot communicate with you</b></li> </ul>
<ul style="list-style-type: none"> <li>Usage pattern of the Platform, to the extent that it includes Personal Data</li> </ul>	<ul style="list-style-type: none"> <li>To provide you with the services</li> <li>To analyze your use of the Platform in order to understand your utilization of Totango Platform</li> <li>To allow Totango's Customer Success Manager to engage with Totango's users</li> <li>To improve our services.</li> </ul>	<ul style="list-style-type: none"> <li><b>Processing is necessary for the performance of a contract to which our customer is a party.</b></li> <li><b>Legitimate interest (e.g. to provide you with the services)</b></li> </ul>	<ul style="list-style-type: none"> <li><b>3<sup>rd</sup> party platforms such as for the following purposes:</b></li> <li>AWS - Our Service is being hosted on AWS Cloud Hosting services •</li> <li>Sendgrid - generating Email Campaigns to our Customer's end users •</li> <li>Zendesk- Support tickets+ management platform •</li> </ul>	<ul style="list-style-type: none"> <li><b>Cannot provide you with the services</b></li> <li><b>Cannot analyze your use of the Platform in order to understand your utilization of Totango Platform</b></li> <li><b>Cannot allow Totango's Customer Success Manager to engage with Totango's users</b></li> <li><b>Cannot improve our services.</b></li> </ul>
<i>When you interact with us on our social media profiles (e.g., Facebook, Instagram, Twitter, LinkedIn)</i>				
<ul style="list-style-type: none"> <li>Full name</li> <li>Title</li> <li>Company</li> <li>Email address</li> <li>Any other data you decide to provide/supply us with</li> </ul>	<ul style="list-style-type: none"> <li>To reply and/or respond to your request or question</li> <li>To establish a first business connection/discussion</li> </ul>	<ul style="list-style-type: none"> <li><b>Depending on the context, legitimate interest (e.g. certain B2B marketing practices or replying your requests/questions), pre-contractual discussions (e.g. if you show interest in our products/services) or consent</b></li> </ul>	<ul style="list-style-type: none"> <li><b>3<sup>rd</sup> party platforms such as for the following purposes:</b></li> <li>LinkedIn-Social Media Platform for Professional Networking, also used for Demand Generation Activities (LinkedIn Ads) •</li> </ul>	<ul style="list-style-type: none"> <li><b>Cannot reply or respond to your request</b></li> <li><b>Cannot establish a business connection</b></li> </ul>

			<ul style="list-style-type: none"> <li>• Hubspot- Marketing Automation Tool</li> <li>• Salesforce- CRM Solution, Sales Pipeline Management tool</li> </ul>	
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Finally, please note that some of the abovementioned Personal Data will be used for detecting, taking steps to prevent, and prosecution of fraud or other illegal activity, to identify and repair errors, to conduct audits, and for security purposes. Personal Data may also be used to comply with applicable laws, with investigations performed by the relevant authorities, law enforcement purposes, and/or to exercise or defend legal claims. In certain cases, we will aggregate, anonymize or de-identify your Personal Data. “**Anonymous Information**” means information which does not enable identification of an individual user, such as aggregated, anonymize or de-identified information about the use of our services. We may use Anonymous Information and/or disclose it to third parties without restrictions (for example, in order to improve our services and products and enhance your experience with them).

**2. PERIOD OF STORAGE OF COLLECTED INFORMATION**

- 2.1. Personal Data. Your Personal Data (as described above) will be stored until we no longer need the information and proactively delete it, or you send a valid deletion request. We will retain your Personal Data for as long as your Totango Service Account is active. We reserve the right to retain any Personal Data, end user Personal Data we process on behalf of our Customers or end users and other Service- related data for such time as we are providing the Service to the Customer to which the information relates and for a reasonable time thereafter and to use information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Please note that we may retain it for a longer or shorter period in accordance with applicable data retention laws.
- 2.2. Cookies. This depends on the cookie in question. Some cookies (e.g. essential cookies) cannot be disabled. You may also control and delete these cookies through your browser settings. Read more in our cookie policy: <https://www.totango.com/cookies-policy>

**3. HOW WE PROTECT AND STORE YOUR INFORMATION**

- 3.1. Security. We have implemented appropriate technical, organizational and security measures designed to reduce the risk of accidental destruction or loss, or the unauthorized disclosure or access to such information appropriate to the nature of the information concerned. However, please note that we cannot guarantee that the information will not be exposed as a result of unauthorized penetration to our servers. As the security of information depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.
- 3.2. Retention of your Personal Data. In addition to the retention periods mentioned in Section 2 above, in some circumstances we may store your Personal Data for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, or (iii) if we reasonably believe there is a prospect of litigation relating to your Personal Data or dealings.

**4. HOW WE SHARE YOUR PERSONAL DATA**

In addition to the recipients described in Section 1, we may share your information as follows:

- To the extent necessary, with regulators, to comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order;
- If, in the future, we sell or transfer some or all of our business or assets to a third party, we will (to the minimum extent required) disclose information to a potential or actual third party purchaser of our business or assets. In the event that we are acquired by or merged with a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer or assign Personal Data in connection with the foregoing events.
- Where you have provided your consent to us sharing the Personal Data (e.g., where you provide us with marketing consents or opt-in to optional additional services or functionality); and

If you want to receive the list of recipients of your Personal Data, please make your request by contacting us at [privacy@totango.com](mailto:privacy@totango.com).

**5. ADDITIONAL INFORMATION REGARDING TRANSFERS OF PERSONAL DATA**

- 5.1. Storage: AWS – North Virginia – US, and AWS – EU— Germany.
- 5.2. Access from Israel: Access from Israel to Personal Data of residents in EEA is covered by the European Commission’s Adequacy Decision regarding Israel. You can read more here: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en)
- 5.3. Access from US: Following the Court of Justice of the European Union’s invalidation of the EU-US Privacy Shield Framework in Case C-311/18, we will no longer rely on the EU-US Privacy Shield as a mechanism of international data transfer until further notice. Totango will however remain committed to maintaining its self-certification under the EU-US Privacy Shield Principles and respect its principles, as an additional measure of protection of its users’ privacy, until further notice..
- 5.4. Internal transfers: We ensure transfers within the Totango group will be covered by an agreement entered into by members of the *Totango* (an intra-group agreement) which contractually obliges each member to ensure that Personal Data receives an adequate and consistent level of protection wherever it is transferred ;
- 5.5. External transfers:
  - Where we transfer your Personal Data outside of EU/EEA, for example to third parties who help provide our products and services, we will obtain contractual commitments from them to protect your Personal Data. Where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any Personal Data is disclosed
  - When Totango engages in such transfers of personal information, it relies on i) Adequacy Decisions as adopted by European Commission on the basis of Article 45 of Regulation (EU) 2016/679 (GDPR) (for example, when we access from Israel), or ii) Standard Contractual Clauses issued by the European Commission. Totango also continually monitors the circumstances surrounding such transfers in order to ensure that these maintain, in practice, a level of protection that is essentially equivalent to the one guaranteed by the GDPR.
  - Where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any Personal Data is disclosed.

**6. YOUR RIGHTS**

The following rights (which may be subject to certain exemptions or derogations) shall apply to certain individuals (some of which only apply to individuals protected by the GDPR):

- You have a right to access information held about you. Your right of access may normally be exercised free of charge, however we reserve the right to charge an appropriate administrative fee where permitted by applicable law;
- You have the right to request that we rectify any Personal Data we hold that it is inaccurate or misleading;

- You have the right to request the erasure of the Personal Data that relates to you. Please note that there may be circumstances in which we are required to retain your data, for example for the establishment, exercise or defense of legal claims;
- The right to object, to or to request restriction, of the processing. However, there may be circumstances in which we are legally entitled to refuse your request;
- The right to data portability. This means that you may have the right to receive your Personal Data in a structured, commonly used and machine-readable format, and that you have the right to transmit that data to another controller;
- You have the right to object to profiling;
- You have a right to lodge a complaint with your local data protection supervisory authority (i.e., your place of habitual residence, place of work or place of alleged infringement) at any time. We ask that you please attempt to resolve any issues with us before you contact your local supervisory authority;
- The right to withdraw your consent. Please note that there may be circumstances in which we are entitled to continue processing your data, in particular if the processing is required to meet our legal and regulatory obligations.
- You also have a right to request details of the basis on which your Personal Data is transferred outside the European Economic Area, but you acknowledge that data transfer agreements may need to be partially redacted for reasons of commercial confidentiality.

You can exercise your rights by contacting us at [privacy@totango.com](mailto:privacy@totango.com). Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly or inform you if we require further information in order to fulfil your request. When processing your request, we may ask you for additional information to confirm your identity and for security purposes, before disclosing the Personal Data requested to you. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initially requested, we will address your request to the maximum extent possible, all in accordance with applicable law.

## 7. USE BY CHILDREN

We do not offer our products or services for use by children. If you are under 18, you shall not use the Website, or provide any information to the Website without involvement of a parent or a guardian. We do not knowingly collect information from, and/or about children.

## 8. PUBLIC INFORMATION ABOUT YOUR ACTIVITY ON THE WEBSITE

Some of your activities on the Website are public (for example, when you comment on our blog and/or community support forum). For more information, please read the Section 1 above.

## 9. HOW CAN I DELETE MY TOTANGO ACCOUNT?

Should you ever decide to delete your Totango Service Account, you may do so by emailing [privacy@totango.com](mailto:privacy@totango.com). If you terminate your account, any association between your Account and information we store will no longer be accessible through your Account. However, given the nature of sharing on certain services (e.g., the blog and/or the community support), any public activity on your Account prior to deletion will remain stored on our servers and will remain accessible to the public.

## 10. LINKS TO AND INTERACTION WITH THIRD PARTY PRODUCTS

The Website enables you to interact with or contain links to your Third Party Account and other third party websites, mobile software applications and services that are not owned or controlled by us (each a “Third Party Service”). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services can collect Personal Data from you. Accordingly, we encourage you to read the terms and conditions and privacy policy of each Third Party Service that you choose to use or interact with.

## 11. LOG FILES

We make use of log files. The information inside the log files includes internet protocol (IP) addresses, type of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, clicked pages and any other information your browser may send to us. We use such information to analyze trends, administer the Website, track users’ movement around the Website, and gather demographic information.

## 12. ANALYTIC TOOLS

- **Google Analytics.** The Website uses a tool called “Google Analytics” to collect information about use of the Website. Google Analytics collects information such as how often users visit this Website, what pages they visit when they do so, and what other websites they used prior to coming to this Website. We use the information we get from Google Analytics to maintain and improve the Website and our products. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google’s ability to use and share information collected by Google Analytics about your visits to this Website is restricted by the Google Analytics Terms of Service, available at <http://www.google.com/analytics/terms/us.html/>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <http://www.google.com/policies/privacy/partners/>. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>.
- **FullStory.** We use an analytic tool offered by FullStory Inc. (“FullStory”), by which we track and record your activities on the Platform. This enables us to assist you in case you need support (per your prior request from us) and upgrade the Platform. For more information about FullStory, please see the FullStory privacy policy available at <https://www.fullstory.com/legal/privacy/>. You can opt out of FullStory’s collection and processing of data generated by your use of the Services by going to <https://www.fullstory.com/optout/>.
- **Google Search Console.** We use Google Search Console, which is a web service by Google which allows webmasters to check indexing status and optimize visibility of their websites. We use it to understand how the Website is being used in order to improve our user experience. For more information, please see [https://support.google.com/analytics/answer/1308617?hl=en&ref\\_topic=1308589](https://support.google.com/analytics/answer/1308617?hl=en&ref_topic=1308589) and review Google’s privacy policy available at: <https://policies.google.com/privacy>.
- **LinkedIn Pixel.** The LinkedIn Insight Tag is a piece of lightweight JavaScript code that we have added to our Website in order to enable in-depth campaign reporting and to help us unlock valuable insights about our Website visitors. We use the LinkedIn Insight Tag to track conversions, retarget website visitors, and unlock additional insights about members interacting with our LinkedIn adverts. The LinkedIn Insight Tag enables the collection of metadata such as IP address information, timestamp, and events such as page views. All data is encrypted. The LinkedIn browser cookie is stored in a visitor’s browser until they delete the cookie or the cookie expires. You can opt out of cookies from LinkedIn on your [LinkedIn settings page](#) and we recommend that you read their cookie policy available at: <https://www.linkedin.com/legal/cookie-policy> and their privacy policy available at: <https://www.linkedin.com/legal/privacy-policy> for more information.

We reserve the right to use other analytic tools.

## 13. CALIFORNIA PRIVACY RIGHTS

California Civil Code Section 1798.83 permits our customers who are California residents to request certain information regarding our disclosure of Personal Data to third parties for their direct marketing purposes. To make such a request, please send an email to [privacy@totango.com](mailto:privacy@totango.com). Please note that we are only required to respond to one request per customer each year.

## 14. OUR CALIFORNIA DO NOT TRACK NOTICE

Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. We may collect personally identifiable information about an individual consumer’s online activities over time and across different web sites when a consumer uses the Services. If you choose to operate your web browser “do not track” signals or any other mechanism that provides consumers the ability to exercise choice regarding the collection of such information, we will use commercially reasonable effort to abide by your request and stop collecting such information. We may allow third parties such as such as companies that provide us with analytics tools, to collect personally identifiable information about an individual consumer’s online activities over time and across different web sites when a consumer uses the Services.

## 15. DELETION OF CONTENT FROM CALIFORNIA RESIDENTS

If you are a California resident under the age of 18 and a registered user, California Business and Professions Code Section 22581 permits you to remove content or Personal Data you have publicly posted. To remove, please follow send an email to [privacy@totango.com](mailto:privacy@totango.com). Please be aware that after removal you will not be able to restore removed content. In addition, such removal does not ensure complete or comprehensive removal of the content or Personal Data you have posted and that there may be circumstances in which the law does not require us to enable removal of content.

**16. CONTACT US**

If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us at [privacy@totango.com](mailto:privacy@totango.com).

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