PRIVACY POLICY

Last Updated: April 27th, 2023

MaestroQA, Inc. (“MaestroQA”, or the “Company”) provides Customer Service Quality Assurance Services (the “Services”) to its corporate customers ( “Customers”) through the MaestroQA platform (the “Platform”). We’ve developed this Privacy Policy (the “Privacy Policy”) to describe to you how we collect, use, disclose, and store personal information from our website visitors and individuals using the Platform for and on behalf of MaestroQA’s Customers.

This Notice only applies when you visit MaestroQA.com (the “Website”) or register an account as a user of the Platform, or where MaestroQA processes your contact data for business administration purposes. In the performance of the Services, we also processes personal data of our Customer’s customers. We do so as a service provider, acting on behalf of our Customers, and in accordance with their instructions. MaestroQA is a processor, not a controller, of personal information that we process on behalf of our Customers. If you have questions related to how a MaestroQA Customer uses your personal information, please contact them directly. We are not responsible for the privacy or data security practices of our Customers. This Privacy Policy also does not apply to personal information about current and former MaestroQA employees, job candidates, or contractors and agents acting in similar roles.

If you are a California, Virginia, Utah, or Nevada resident please see the sections “Additional Privacy Rights and Information for California Residents,” “Additional Privacy Rights and Information for Nevada Residents,” and “Additional Privacy Rights and Information for Virginia, Connecticut, Utah, and Colorado Residents” as applicable to you. If you are an EEA, Swiss, or UK data subject, please see the section “Supplemental Information for the EEA, Switzerland, and the U.K”. If you have questions or concerns about our Privacy Policy, please contact us as set forth in the section entitled “Contact Us”.

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Categories of Personal Information We Collect

We may collect different kinds of personal information about you which we have grouped together as follows:

- **Identity Data**, such as your name, job title, and company, usernames or other account login details;
- **Contact Data**, such as your email address, business address, location, telephone numbers;
- **Profile Data**, such as your interests (e.g., which sessions you are attending at a sponsored event or which webinars you have signed up for), feedback, and survey responses;
- **Marketing and Communications Data**, such as your preferences in receiving Services, marketing or other communications from us, inquiries, contact or other information you choose to provide during your use of the Services;
- **Technical Data**, such as Website pages visited, the website from which you visited our Website, information about the equipment used to access our Website including your internet protocol (IP) address, browser type and version, time zone, setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the Website;
- **Usage Data**, such as information about how you use our Website;
- Additional information you may choose to share with us when you interact with us.

Please Note: If you would like to see a description of the categories of information we collect described in accordance with the categories required under California law please go to the “Additional Privacy Rights and Information for California Residents” section of this Privacy Policy.

Sources of Personal Information

Directly From You. We may ask you to provide certain personal information when you register an account on the Platform, use certain parts of our Website, when you attend our events and webinars, when you interact with us at a conference or communicate with us in person, by phone, email or otherwise.

From Third Party Sources. We may collect personal information about you through your colleagues or, where available, through publicly available sources, such as professional networking sites and general market research. We may also, from time to time, receive information about you from another a contact who believes our Services would be of interest to you.

Automatically Through Our Platform and E-Mail Correspondence. As you navigate through our Website or interact with our e-mails, we and our service providers may use automatic data collection technologies to collect the Technical Data described in the “Categories of Personal Information We Collect” section of our Privacy Policy. Please Note: We also use Google Analytics on our Website to collect information such as your IP address, your internet service
provider, the web page you linked to our Website from, and other clicking and browsing behavior, to analyze how users use our Website. You may opt out of Google Analytics by using the browser add-on provided by Google, available at https://tools.google.com/dlpage/gaoptout.

**Purpose for Collecting Personal Information**

We collect and use the personal information we collect for the following purposes:

- To present our Website and its contents to you.
- To allow you to register to use our Service.
- To perform services requested by you such as, if you are accessing the Services for or on behalf of our Customer, monitoring customer support services and customer relationship management.
- To respond to your requests and provide customer service.
- To allow you to participate in interactive features on our Website and e-mails.
- To provide you with information, products, or services that you request from us.
- To prevent or take action regarding illegal activities, including suspected fraud.
- To improve our marketing and promotional efforts and product offerings.
- To monitor and analyze trends, usage, and activity.
- To provide you with advertising which may be of interest.
- To provide you with notices about your account, including expiration and renewal notices.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide through it.

We may also use your personal information to contact you about our goods and services that may be of interest to you. If you do not want us to use your information in this way, please click the unsubscribe link in our marketing emails. **Please Note:** If you unsubscribe from receiving marketing communications, we may still contact you for the purpose of providing you with service related messages.

**Deidentified Personal Information**

We may use deidentified or anonymous information that does not identify you (including information that has been de-identified or anonymized so that it can no longer be associated with a natural person) without obligation to you except as prohibited by applicable law. We may also, if permitted by applicable law, combine personal information with information which has been de-identified or anonymized, we will treat such combined information as personal information and will not attempt to reidentify it. Additionally, if we receive deidentified / anonymized personal information from our Customers we will not attempt to re-identify it.

**How We Disclose Your Personal Information**

We disclose your personal information in accordance with the practices described in this Privacy Policy. The types of entities to whom we disclose and have disclosed information within the last 12 months include the following:

- **Service Providers.** We share your personal information with agents, contractors, and other
service providers in connection with their work on our behalf (collectively “Service Providers”).

- **Professional advisors.** We may disclose personal information to professional advisors, such as lawyers, auditors and insurers, as necessary in the course of the professional services they provide us with.

- **Affiliates.** We may share your personal information with our related entities including our parent and sister companies. For example, we may share your information with our affiliates for business purposes such as customer support, marketing, and technical operations.

- **Feedback, Testimonials and User Provided Content.** If you provide feedback or testimonials relating to the Services we may post and share this feedback, testimonial, or other user provided content, including your personal information, on the Services, with partners, or in marketing and promotional materials. We may, in our sole discretion, edit feedback, testimonials or user provided content for length and content.

- **Business Transfer.** To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us as a controller is among the assets transferred.

- **Enforcement of Rights.** To enforce or apply our Terms of Use, our other agreements, or other rights we may have under law.

- **Security, Compliance with Law.** We may disclose your information as we deem necessary, in our sole discretion, to comply with any applicable law, regulation, legal process or governmental request. We also may share your information in order to investigate, prevent or take action regarding illegal activities, including suspected fraud, or as otherwise required by law. We may also share your information to protect the rights, property, life, health, security and safety of us, our Website or service or any person or party.

- **Consent.** We may share your information for any other business or commercial purposes disclosed to you and with your consent.

We may also share aggregated information which does not identify you or de-identified / anonymized information about you with other parties or affiliates for any purpose except as prohibited by applicable law. For information on your rights and choices regarding how we share your information, please see the section entitled “Your Rights and Choices” below.

**Children**

MaestroQA does not knowingly collect personal information from children under the age of sixteen (16). If you are a parent or guardian and believe Maestro has collected such information in a manner not permitted by the Children’s Online Privacy Protection Act (“COPPA”) or any
other law, please contact us as set forth in the section entitled “Contact Us” below, and we will remove such data to the extent required by applicable law.

Links to Other Websites

Our Website may contain links to other sites operated by third parties, including social media sites and services. We are not responsible for information on these sites, nor for services or products offered by them. By providing these links we do not imply that we endorse or have reviewed these sites. Use of these sites, including transmitting your personal information to them, is at your own risk. The information that you share with these sites will be governed by the specific privacy policies and terms of service of these third-party sites and not by this Privacy Policy. Please contact those sites directly for information on their privacy practices and policies.

Cookies and Tracking Technologies

We use cookies and other tracking technologies and offer you the option to manage these settings as described in our Cookie Notice.

Your Rights and Choices

In addition to the rights set out in our Cookie Policy you may exercise the rights described in this section in relation to the personal information processed by MaestroQA. Please note some of the rights may vary depending on your country, province, or state of residence.

You may also opt out of tracking technologies by broadcasting an Opt-Out Preference Signal, such as the Global Privacy Control (GPC) (on the browsers and/or browser extensions that support such a signal). To download and use a browser supporting the GPC browser signal, click here: https://globalprivacycontrol.org/orgs. If you choose to use the GPC signal, you will need to turn it on for each supported browser or browser extension you use. Please note: If you disable or refuse all cookies some parts of our Website may then be inaccessible or not function properly.

Accessing and Correcting Your Information. If there are any changes or updates of your personal information you would like to alert us to, or if you would like to delete your personal information, you may contact us at privacy@maestroqa.com. Please note: (i) we may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect; (ii) we will not be able to delete data contained in backups or aggregated data from our database.

Marketing Communications. You will receive marketing communications from us if you have requested information from us and, in each case, you have not opted out of receiving that marketing. You can ask us to stop sending you marketing messages at any time by following the opt-out links in any marketing message sent to you, or by contacting us at privacy@maestroqa.com.

Sensitive Personal Information

MaestroQA does not request or require that you provide any sensitive personal information to us (e.g., social security number, driver’s license number, state identification card, passport
number, information related to racial or ethnic origin, political opinions, religious, philosophical, or other beliefs, information related to sex life or sexual orientation, health data, biometric or genetic characteristics, criminal convictions and offenses, trade union membership, or specific geolocation). We request that you do not send to us, share it with us or otherwise disclose to us any sensitive personal information.

**Data Security**

Keeping your information secure is important to us. We maintain a variety of appropriate technical and organizational safeguards to protect your personal information both during transmission and once it is received. MaestroQA has no control over or responsibility for the security or privacy policies or practices of other sites on the Internet you might visit, interact with, or from which you might buy products or services, even if you visit them using links from our Website.

Please note that no website or service is completely secure and so, while we endeavor to protect the personal information we collect using the measures described above, we cannot guarantee that unauthorized access, hacking, data loss or a data breach will not occur. If you are interested in learning more about our security practices please click [here](#).

**Retention of Your Personal Information**

Your personal information will be generally retained as long as necessary to fulfill the purposes for which we collected it, to comply with our legal obligations, to resolve disputes, and to enforce our agreements. We will also store personal information associated with you for as long as you have a relationship with us or we believe we may be in a position to provide our Services to you. Once you and/or your company has terminated the contractual relationship with us or otherwise ended your relationship with us, we may retain your personal information in our systems and records to ensure adequate fulfillment of surviving provisions in terminated contracts or for other legitimate business purposes, such as to evidence our business practices and contractual obligations, to provide you with information about our Services, or to comply with applicable legal, tax, or accounting requirements. When we have no ongoing legitimate business need nor lawful legal ground to process your personal information, we will delete, or permanently anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing pending deletion. If you want to know more about retention periods applicable to your particular circumstance, please contact us using the “Contact Us” section below.

**Automated Decision-Making**

MaestroQA does not use any personal information provided by you for the purpose of automated decision-making.

**Visiting this Website from Outside the United States**

If you are visiting this Website from outside the United States or are not a US resident, please be aware that your information may be transferred to, stored, and processed in the United States where our servers are located and our central database is operated. The information
protection laws of the United States might not be as comprehensive or protective as those in your country. By using this Website or communicating with us offline you understand that your personal information may be transferred to our facilities and to third parties as described in this Privacy Policy.

Additional Privacy Rights and Information for California Residents

This section supplements the information contained in the Privacy Policy and applies solely to residents of the State of California, as defined in Section 17014 of Title 18 of the California Code of Regulations. This section is provided to comply with the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (CPRA), and regulations promulgated thereunder as each may be amended from time to time (collectively, the “CCPA”). Any terms defined in the CCPA have the same meaning when used in this section. If you are a California resident, you have certain rights with respect to your personal information.

Categories of Personal Information We Collect

We set out below the CCPA categories of personal information we have collected as a “business” from consumers within the last twelve months:

- **Identifiers**, such as your name, email address, phone number, and IP address.
- **Commercial Information**, such as records of Services considered or other purchasing or service history.
- **Internet or Network History**, such as Website pages visited, the website from which you visited our Website, information about the equipment used to access our Website including such as your name, email address, postal address, phone number, unique personal identifier, online identifier and IP address, browser type and version, time zone, setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Website.
- **Geolocation**, non-precise geolocation derived from your IP address.
- **Professional or Employment Related Information**, such as current employer, industry, company, location, company domain or URL, position, and title.

How We Collect Your Personal Information

Please see the "How We Collect Your Personal Information" section in our Privacy Policy to understand the sources from which we get personal information.

How We Use Your Personal Information

Please refer to the "How We Use Your Personal Information" section in our Privacy Policy to understand the business and commercial purposes for which personal information is used.

Categories of Personal Information We Sell or Share

We do not “sell” or “share” your personal information and we have not done so in the past twelve months.

Your Rights Under California Law
If you are a California resident you have the following rights under California Law:

• **Right to Know (Collection).** You have the right to know and see what data we have collected about you over the past 12 months including:
  o The categories of personal information we have collected about you;
  o The categories of sources from which the personal information is collected;
  o The business or commercial purpose for collecting your personal information;
  o The categories of third parties with whom we have shared your personal information;
  o If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
    ▪ sales, identifying the personal information categories that each category of recipient purchased; and
    ▪ disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.
  o The specific pieces of personal information we have collected about you.

• **Right to Delete.** You have the right to request that we delete the personal information we have collected from you (and we are required to direct our Service Providers to do the same). Once we have verified your request, we will review your request to see if an exception allowing us to retain the information applies.

• **Right to Correction.** You have the right to request that we correct inaccurate personal information that we maintain about you.

• **Right to Opt-Out.** You have the right to opt-out from the “sale” or “sharing” of your personal information (as those terms are defined under California law). **Please Note:** We do not sell or share your personal information with “third parties” as those terms are defined under the CCPA and we have not done so in the preceding twelve months.

• **Right to Limit Use and Disclosure of Sensitive Personal Information.** You have the right to limit our use of sensitive personal information for any purposes other than to provide the Services you request or as otherwise permitted by law. **Please Note:** to the extent you choose to share sensitive personal information with us, we do not use or disclose that sensitive personal information for purposes other than those specified in Section 7027(m) of the California Consumer Privacy Act.

• **Right to Non Discrimination.** You have the right not to be discriminated against for exercising any of the rights listed above.

**How to Make a Request**

You can initiate a request by sending an e-mail to privacy@maestroqa.com using the subject line “California Request”. Once we receive your request, we will validate the information that you provide and send a message to the email address you provide in the request, asking you to confirm that you are a California resident. Please follow the instructions in that email to provide that confirmation. We will begin processing your request once we have received that confirmation.

You can designate an authorized agent to make a request to exercise your rights under California law on your behalf. In order to do that, please provide the agent with written permission, signed by you, authorizing the agent to submit the request on your behalf. The agent must submit that written
permission along with the request. We will contact you to verify your identity — and the authorized agent’s permission — before a response to the request is sent.

In certain instances, your request (or the request of your agent) may be denied as required or permitted by law.

Record of Requests
We keep a record of requests that we received from California residents.

Shine the Light Law.
California’s "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request write us at the address listed in the “Contact Us” section of this Privacy Policy.

Additional Privacy Rights and Information for Nevada Residents
If you are a resident of Nevada, you have the right to submit a verified request directing us not to sell the personal information we have collected or will collect about you.

You can initiate a request by sending an e-mail to privacy@maestroqa.com using the subject line “Nevada Do Not Sell Request”.

Please Note: We do not sell your personal information as sales are defined under Nevada Law.

Additional Privacy Rights and Information for Virginia, Connecticut, Utah, and Colorado Residents
If you are a resident of Virginia, Colorado or Connecticut (starting July 1, 2023), or Utah (starting December 31, 2023) you have the right to

• Confirm whether or not we are processing your personal information and if we are, request access to it;
• Request correction of inaccuracies in the personal information in our possession;
• Request the deletion of your personal information;
• Request a copy of your personal information in a portable and, to the extent technically feasible, readily usable format; and
• Request to opt out of the processing of your personal information for purposes of targeted advertising, profiling, or sale.

You can initiate a request by sending an e-mail to privacy@maestroqa.com using the subject line “Privacy Request”. In certain instances, your request may be denied as required or permitted by applicable law. You may appeal any denial by sending an e-mail to privacy@maestroqa.com using the subject line: “Privacy Appeal.” We will respond to appeals from Virginia and Connecticut residents within 60 days. We will respond to appeals from Colorado residents within 45 days.

Please Note: We do not use your personal information for purposes of targeted advertising, profiling, or sale as those terms are defined under applicable law.
Supplemental Information for the EEA, Switzerland, and the U.K

Your Rights.
Individuals located in the UK or the EEA have certain statutory rights regarding their personal information. Subject to any exemptions provided by law, you may have the right to:

- **Access.** Request access to your personal information (commonly known as a “data subject access request”) and to certain additional information about our processing of your personal information that this Notice is designed to address.
- **Correct.** Request correction of the personal information we hold about you. This enables you to update or correct any inaccuracies in your personal information.
- **Delete.** Ask us to delete or remove your personal information from our system where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Transfer.** Ask us to transfer a machine-readable copy of your personal information to you and/or a third party of your choice, where our processing is based on your consent.
- **Object.** You can object: (1) to processing of your personal information at any time for direct marketing purposes, (2) to decisions being taken by automated means which produce legal effects concerning you or significantly affect you, and (3) in certain other situations to our continued processing of your personal information.
- **Restrict.** Restrict processing of your personal information. This enables you to ask us to suspend the processing of personal information about you where, for example, you want us to establish its accuracy or the reason for processing it.
- **Withdraw.** Withdraw your consent to our processing of your personal information, where we have collected and processed it with your consent. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you would like to submit a question or complaint about our use of your personal information or request a response, contact us at privacy@maestroqa.com. Please note that we try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated. You can submit these requests by email to our DPO at privacy@maestroqa.com or by mail to our postal address, 33 West 17th Street, Floor 8, New York, New York, 10011. Please let us have enough information to identify you. We may need to request specific information from you to help us confirm your identity. We may also ask you for further information in relation to your request to speed up our response.

In the performance of the Services, MaestroQA processes personal information of its Customer’s customers. We do so as a service provider acting on behalf of our Customers and in accordance with their instructions. If you are a customer of one of our Customers and wish to exercise your statutory rights in relation to personal information processed by MaestroQA on behalf of a Customer, you
should contact that Customer with your request. We will then help them to fulfill that request in accordance with their instructions and our legal obligations.

We hope that we can resolve any query or concern that you raise about our use of your personal information. However, If you are located in the UK or the EEA, you also have the right to lodge a complaint with a supervisory authority. In the UK this is the Information Commissioner’s Office (www.ico.org.uk). In the EEA this will be the supervisory authority in the European Union (or EEA) country where you work, normally live or where you consider any alleged infringement of data protection laws occurred.

Processing Purposes

We may inform you that we will process your personal information for other purposes not identified in the section ‘Purpose for Collecting Personal Information’ above. Where we do so, we will provide you with an additional privacy notice explaining how we will use your information for these purposes.

Legal basis for processing your personal information.

Website Users.

Where we process your personal information to present our Website and its contents to you, to provide you with information on products, or services that you request from us, to allow you to participate in interactive features on our Website, we consider this processing is necessary for our legitimate interests and that your interests and fundamental rights do not override those interests.

Where we process your personal information to send you advertising which we think may be of interest to you, we do so on the basis of your consent in accordance with your marketing preferences.

[Where we use cookies to collect personal information for the purposes of monitoring and analyzing trends, usage, and activity, we do so on the basis of your consent.]

Customer Personnel.

Where we process your information to allow you to register to use our Service; to respond to your requests and provide customer service; to allow you to participate in interactive features on our Website; to prevent or take action regarding illegal activities, including suspected fraud; to improve our marketing and promotional efforts and product offerings; to provide you with notices about your account; to enforce our rights arising from any contracts entered into between you and us; and to notify you about changes to our Website or any products or services we offer or provide through it, we consider this is necessary for our legitimate interests and that your interests and fundamental rights do not override those interests.

Where we process your information to provide you with products or services that you request from us; to perform services requested by you such as monitoring customer support services and customer
relationship management, this processing is necessary to perform the contract we have entered into with you.

Where we process your personal information to send you advertising which we think may be of interest to you, we do so on the basis of your consent in accordance with your marketing preferences.

Where we use cookies to collect personal information for the purposes of monitoring and analyzing trends, usage, and activity, we do so on the basis of your consent.

We will rely on a legal obligation if we are legally required to hold or otherwise use your personal information to comply with legal or regulatory requirements, such as disclosure to regulators.

Other Individuals.

Where we process your information to provide you with information that you have requested from us, we consider this is necessary for our legitimate interests and that your interests and fundamental rights do not override those interests.

International Data Transfers.
Whenever we transfer your personal information outside the UK or EEA, we ensure that a similar degree of protection is afforded to it by ensuring appropriate safeguards are implemented. This may include, where appropriate, relying on an adequacy decision, or signing up to the European Union Standard Contractual Clauses or UK International Data Transfer Agreement. To find out more information regarding the specific mechanism used by us when transferring your personal information outside the UK or EEA, please contact us using the contact details below in the “Contact Us” section of this privacy policy.

How to contact us.
We value your privacy and your rights as a data subject and have therefore appointed Prighter Group with its local partners as our privacy representative and your point of contact.

Prighter gives you an easy way to exercise your privacy-related rights (e.g. requests to access or erase personal information). If you want to contact us via our representative, Prighter or make use of your data subject rights, please visit the following website. https://prighter.com/q/13192071206

EU Representative
PrighterGDPR-Rep by Maetzler Rechtsanwalts GmbH & Co KG c/o MaestroQA, Inc.
9 Clare Street
Dublin 2 D02 HH30
Ireland
https://prighter.com

UK Representative
Updates to Our Privacy Policy

We may update this privacy policy from time to time in response to changing legal, technical, or business developments. If we change our Privacy Policy, we will post those changes on this page in addition to updating the "Last Updated" date at the top of this webpage. If we make material changes, we will notify you more directly, for example by posting a notification or message on the Website or by emailing you prior to such changes taking effect. We encourage you to review this Notice regularly to stay informed of the latest modifications.

Contact Us

If you have any questions, comments or concerns about this Privacy Policy or if you wish to contact us for any reason, please e-mail our Chief Privacy Officer at privacy@maestroqa.com.

You can also write to us at:
MaestroQA, Inc.
Attn: Chief Privacy Officer
33 West 17th Street, Floor 4
New York, NY 10011