

## **PRIVACY POLICY**

Welcome to ZillionInfo Online, owned and operated by Zillion Info, LLC. (“ZillionInfo”, “us,” or “we”), a South Carolina LLC. This Privacy Policy explains the information collected and stored at ZillionInfo and associated applications, web services, and other mechanisms associated with ZillionInfo (collectively, the “Service”). The Privacy Policy also explains how we use the information collected on the Service.

## **HOW YOU ACCEPT THIS NOTICE**

By visiting the ZillionInfo website (the “Site”) or using the Service, including by registering, or by otherwise providing us with personal information (“PI”) (such as an email address), you agree to the terms and conditions of this Privacy Policy.

## **COOKIES**

Cookies are small pieces of text that websites you visit can place on the device you’re using to make the visit—generally a computer or mobile device. Standing alone, cookies do not personally identify you—they merely recognize your Web browser.

First-party cookies are cookies set by us on our Site or the Services. Third-party cookies are set by the external providers whose services are used by our Site; these external providers also set their own cookies. Third-party cookies’ terms of use are governed by the external provider’s specific terms and conditions, which we have no control over. We may update the external providers we use periodically.

We use cookies to make interactions with the Site and Services easy and meaningful. When you use the Site and choose to accept analytics cookies, we use these to optimize the Site by collecting and reporting information on how you use it. When you use the Services and agree to our [Master Services Agreement](#), we employ analytics cookies for the same reason.

## **INFORMATION WE COLLECT THAT IS NOT PI**

We may collect information that is not PI in connection with use of the Site or the Service, such as login and device-related information (e.g., browser type, your IP address, and the date and time of day of your use). Such information may be considered PI in your jurisdiction.

## **HOW WE USE INFORMATION THAT IS NOT PI**

We may use collected information to enhance the visitor experience of the Site or the Service, to operate and maintain the Service, to investigate and understand how our Service is used, to monitor and protect the security and integrity of the Service, and to analyze our business.

## **WHAT WE COLLECT THAT IS PI**

We collect the following PI from those who choose to purchase our paid plan: name, address, email address, phone number, credit card information and organization information.

For customers who use the free version of ZillionInfo we collect the following information: name, email, password and some social media information (e.g. Twitter handle) that you may choose provide to us.

We may also collect other PI if you contact us or otherwise give it to us (e.g., in an email).

## **HOW WE USE AND DISCLOSE PI**

We use personal data to provide you with the Service per the [ZillionInfo Master Services Agreement](#), to enhance the visitor experience of the Service, to operate and maintain the Service, to investigate and understand how the Service is used, to communicate with you about using the Service, to monitor and protect the security and integrity of the Service, and to analyze our business.

If you consent to marketing communications the Company may also use information you provide to send you information regarding ZillionInfo.

We may disclose PI as required by law or in response to service of legal process, such as a court order, summons, subpoena, or the like.

We may share PI with our corporate affiliates and with business partners who provide services related to the Service (such as website hosting or technical support). These business partners do not have the right to use this PI for any purpose other than those related to the Service.

Information about our users, including PI, may be disclosed or transferred to entities now or in the future affiliated with ZillionInfo or as part of any merger, acquisition, change of control, debt financing, insolvency, bankruptcy or sale of our assets. Such information may be used in the businesses of any entity so receiving it.

Except as provided above, we will not sell or transfer your PI to third parties.

## **DO NOT TRACK**

Currently, various browsers offer a “do not track” or “DNT” option that relies on a technology known as a DNT header, which sends a signal to Web sites’ visited by the user about the user’s browser DNT preference setting. We do not currently commit to responding to browsers’ DNT signals with respect to the Site, in part, because no common industry standard for DNT has been adopted by industry groups, technology companies or regulators, including no consistent standard of interpreting user intent. However, we will make efforts to continue to monitor developments around DNT browser technology and the implementation of a standard.

## **HOW YOU CAN ACCESS OR CHANGE THE PI THAT YOU HAVE PROVIDED**

Once you have registered with us, you can access your profile, review the information that is stored, and revise that information.

## **CUSTOMER DATA**

Customer data is all the information including text, images, location data, other PI, or any other files that you provide, or are provided on their behalf, to us through your use of the Service. We inform you that you are responsible for the provision of any PI.

We will not collect customer data. ZillionInfo only processes it for the provision of the Service, and it will not be processed for any other purposes.

## **CHILDREN**

We do not target, market to, or knowingly collect PI from children under the age of thirteen.

## **DATA RETENTION**

We retain your PI for up to 2 years, after which it is destroyed.

## **DATA SECURITY**

We use industry standard physical, managerial, and technical safeguards to preserve the integrity and security of your PI. We cannot, however, ensure the security of any information you transmit to the Service, and you do so at your own risk.

## **YOUR CALIFORNIA PRIVACY RIGHTS**

ZillionInfo collects the following categories of PI directly from those who choose to purchase our paid service and from those who use the free version of ZillionInfo: identifiers such as a real name, alias (ZillionInfo username), online identifier Internet Protocol address, email address, ZillionInfo account password; ZillionInfo account type; ZillionInfo account creation date; date and time of first visit; date and time of last session; number of pageviews; referral source; and social media information, job role, company name, phone number, website, location, description, billing address and/or credit card information that you may choose provide to us. The business purpose for collecting this PI is to provide you with the Service. The categories of third parties with whom ZillionInfo may share your PI are entities we use for cloud hosting and storage, and those who provide us with technical support.

Residents of California have the right to request from a business, with whom the California resident has an established business relationship, certain information with respect to the types of PI the business shares with third parties for those third parties' direct marketing purposes and the identities of the third parties with whom the business has shared such information during the immediately preceding calendar year. To exercise your rights, you may make one request each year by emailing us at [info@zillioninfo.com](mailto:info@zillioninfo.com). Your request should specify your full name and the email address you used when submitting PI to us.

Residents of California also have the right to direct a business that sells PI about the California resident to third parties not to do so, or to request access to or the deletion of their data. ZillionInfo does not share your PI in a manner that would be considered a sale under California law. Although ZillionInfo does not currently share PI in a manner that would be considered a sale under California law, you may still

submit a request each year to opt out, or to request access to or the deletion of your data. You may do so by writing to us at [info@zillioninfo.com](mailto:info@zillioninfo.com).

## **YOUR EUROPEAN ECONOMIC AREA (EEA) DATA PROTECTION RIGHTS**

### *A. What we collect that is personal data in the EEA*

We collect the following “personal data,” as defined in Regulation (EU) 2016/679 of the European Parliament and of the Council (the “[GDPR](#)”), from those who choose to purchase our paid service and from those who have a free account: first and last names; business email address; ZillionInfo account username; ZillionInfo account password; phone number; job title; company name; ZillionInfo account type; ZillionInfo account creation date; IP address; date and time of first visit; date and time of last session; number of pageviews; and referral source; as well as social media information (e.g., Twitter); avatar; number of employees at your company; industry; case studies you’re interested in; website; location; description; billing address; and/or credit card information that you may choose to provide to us.

In addition to the personal data you provide when downloading a resource or signing up for a webinar or demo—first and last names, business email address, job title, company name, country, industry, number of employees at your company, phone number, and the use cases you’re interested in—we collect the following personal data: IP address; date and time of first visit; date and time of last session; number of pageviews; and/or referral source.

We may also also collect other personal data if you contact us or otherwise give it to us (e.g., in an email).

### *B. How we use and disclose your personal data*

We use personal data to provide you with the Service per the [ZillionInfo Master Services Agreement](#), to enhance the visitor experience of the Service, to operate and maintain the Service, to investigate and understand how the Service is used, to communicate with you about using the Service, to monitor and protect the security and integrity of the Service, and to analyze our business.

We may share personal data with our corporate affiliates and with business partners who provide services related to the Service (such as website hosting or technical support). These business partners do not have the right to use this personal data for any purpose other than those related to the Service. If a visitor to our website or an individual who signs up for a free account belongs to a region where ZillionInfo has business partner resellers of the Services, we may share your personal data with these partners for the purpose of allowing them to help us develop our business through sales of the Services.

We may engage in automated decision-making to enhance the visitor experience and analyze and grow our business. For example, we may tailor mailing lists to certain industry groups or display certain information based on a user's geographic location.

### *C. Legal basis for processing your personal data*

The legal bases for processing your personal data is contract, consent, and/or legitimate interests, in particular to conduct business within ZillionInfo, to develop our business, to market and sell our products and Service, and to maintain the accuracy of our databases and documentation. Where you have given consent to



the processing of your personal data for one or more specific purposes, you have the right to withdraw consent at any time.

#### *D. Data subject rights*

Data subjects protected by the GDPR have the right to make certain requests with respect to their personal data controlled by ZillionInfo, and to lodge a complaint with a supervisory authority.

##### 1. Right of Access

Each data subject protected by the GDPR has the right to obtain confirmation from ZillionInfo as to whether personal data concerning her or him is being processed, as well as the information outlined in the GDPR's [Article 15](#) in the event this is the case. If you wish to exercise this right please contact us at [info@zillioninfo.com](mailto:info@zillioninfo.com), using the email address you used when submitting personal data to us and specifying your full name.

##### 2. Right to Rectification

Each data subject protected by the GDPR has the right to obtain from ZillionInfo without undue delay the rectification of inaccurate personal data concerning her or him, as well as the right to have incomplete personal data completed. If you wish to exercise this right please contact us at [info@zillioninfo.com](mailto:info@zillioninfo.com).

##### 3. Right to Erasure (Right to be Forgotten)

Each data subject protected by the GDPR has the right to obtain from ZillionInfo the erasure of personal data concerning her or him without undue delay when one of the grounds listed in the GDPR's [Article 17](#) applies. If one

of these conditions has been met and you wish to exercise this right, please contact us at [info@zillioninfo.com](mailto:info@zillioninfo.com), using the email address you used when submitting personal data to us specifying your full name as well as the condition you believe has been met.

4. Right to Restriction of Processing

Each data subject protected by the GDPR has the right to restrict the processing of her or his personal data where one of the grounds listed in GDPR [Article 18](#) applies. If one of these conditions has been met and you wish to exercise this right, you may contact us at [info@zillioninfo.com](mailto:info@zillioninfo.com), using the email address you used when submitting personal data to us, specifying your full name as well as the condition you believe has been met.

5. Right to Data Portability

Each data subject protected by the GDPR has the right to receive the personal data concerning her or him, and which was provided to ZillionInfo, in a structured, commonly used and machine-readable format, where both of the conditions listed in GDPR [Article 20 \(1\)](#) apply. In addition, such data subject has the right to have her or his personal data transmitted directly from ZillionInfo to another controller, where such transfer is technically feasible and when doing so does not adversely affect the rights and freedoms of others. If you wish to exercise your right to data portability, you may contact us at [info@zillioninfo.com](mailto:info@zillioninfo.com), using the email address you used when submitting personal data to us and specifying your full name.

6. Right to Object

Each data subject protected by the GDPR has the right to object, on grounds relating to her or his particular situation, at any time, to processing of personal data concerning her or him which is based on the GDPR's [Article 6\(1\) point \(e\) or \(f\)](#). If you wish to exercise your right to object, please contact us at

info@zillioninfo.com, using the email address you used when submitting personal data to us and specifying your full name.

7. Automated, Individual Decision-Making

Each data subject protected by the GDPR has the right not to be subject to a decision based solely on automated processing which produces legal effects concerning her or him or similarly significantly affects her or him, and when one of the grounds listed in the GDPR's [Article 22 \(2\)](#) does not apply. If you believe that none of these conditions has been met and wish to exercise this right, please contact us at info@zillioninfo.com, using the email address you used when submitting personal data to us and specifying your full name.

*E. Period for which personal data will be stored*

Please see "[Data Retention](#)," above

*F. Hosting*

This Service and/or your personal data may be hosted in the United States, a country with an adequacy decision by the European Commission (Privacy Shield). By providing us with your personal data, you may be: (i) permitting the transfer of your personal data to the United States, which may not have the same data protection laws as the country in which you reside; and (ii) permitting the use of your personal data in accordance with this Privacy Policy. In some instances we may transfer personal pursuant to the Model Clauses, a copy of which you can download from the Commission's website.

*G. Privacy Shield*

In conformity with the Notice Principle of the EU-U.S. Privacy Shield Framework, ZillionInfo informs data subjects of the EU, Iceland, Liechtenstein, and Norway that:

1. ZillionInfo is a company that participates in the Privacy Shield Framework and declares its commitment to comply with the Privacy Shield Principles. The

Privacy Shield list is located at the following web address: <https://www.privacyshield.gov/list>

2. ZillionInfo collects the personal data outlined in section A, "What we collect that is personal data in the EEA," above.
3. ZillionInfo is fully committed to subject to the Privacy Principles all personal data received from the EU in reliance on the Privacy Shield.
4. The purposes for which ZillionInfo collects and uses personal data are to enhance the visitor experience of the Service; to operate and maintain the Service; to investigate and understand how the Service is used; to monitor and protect the security and integrity of the Service; and to analyze our business. ZillionInfo may also collect, store, and use personal data about your computer and/or your visits to and use of its Site, including your IP address, geographical location, browser type, referral source, length of visit, and number of page views.
5. ZillionInfo may be contacted with any inquiries or complaints regarding non-compliance with the EU-U.S. Privacy Shield by writing to [info@zillioninfo.com](mailto:info@zillioninfo.com)
6. The type of third parties to which ZillionInfo discloses personal data are corporate affiliates and business partners, for the limited and specified purpose of providing services related to the Service (such as website hosting or technical support). These business partners do not have the right to use this personal data for any purpose other than those related to the Service, and onward transfers only occur on the basis of a contract. We may disclose personal data about our users to entities now or in the future affiliated with ZillionInfo for the purpose of enhancing the visitor experience of the Service; operating and maintaining the Service; investigating and understanding how the Service is used; monitoring and protecting the security and integrity of the Service; and analyzing our business. We may also disclose personal data about our users as part of any merger, acquisition, change of control, debt financing, insolvency, bankruptcy or sale of our assets for the purpose of completing our contractual obligations. Except as provided above, we will not sell or transfer your personal data to third parties.

7. Anyone in the EU whose personal data has been transferred to the United States has a right to access their personal data.
8. The choices and means ZillionInfo offers individuals for limiting the use and disclosure of their personal data are the following: writing to us at any of the physical or email addresses indicated above and requesting the limitation or disclosure of their personal data.
9. The independent dispute resolution bodies ZillionInfo designates to address individuals' complaints regarding our non-compliance with the EU-U.S. Privacy Shield are the EU data protection authorities (DPAs); ZillionInfo voluntarily commits to cooperate with EU DPAs.
10. ZillionInfo is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).
11. In cases where their complaints have not been resolved by any of these recourse or enforcement mechanisms, individuals in the EU also have a right to invoke binding arbitration under the Privacy Shield Panel.
12. ZillionInfo is required to disclose personal data in response to lawful requests by public authorities, including to meet national security, law enforcement, or other public interest requirements.
13. ZillionInfo is liable in cases of onward transfers to third parties. This privacy policy does not cover any applications, software, or web-based applications supported or created by ZillionInfo or its partners.

In accordance with the Data Integrity and Purpose Limitation Principle of the EU-U.S. Privacy Shield, ZillionInfo will take reasonable steps to ensure that personal data is relevant to its intended use, accurate, complete, and current.

In conformity with the Choice Principle of the EU-U.S. Privacy Shield, ZillionInfo offers data subjects of the EU, Iceland, Liechtenstein, and Norway the opportunity to opt out when their personal data is (i) to be disclosed to a third party or (ii) to be

used for a purpose that is materially different from the purpose(s) for which it was originally collected or subsequently authorized.

In accordance with the Security Principle of the EU-U.S. Privacy Shield, ZillionInfo shall take reasonable and appropriate security measures, taking into account the risks involved in the processing and the nature of the data.

In conformity with the Access Principle of the EU-U.S. Privacy Shield, ZillionInfo acknowledges that data subjects of the EU, Iceland, Liechtenstein, and Norway have the right to obtain confirmation of whether ZillionInfo is processing personal data related to them, have the data communicated within reasonable time, and may correct, amend or delete personal data where it is inaccurate or has been processed in violation of the Principles.

In accordance with the Recourse, Enforcement and Liability Principle of the EU-U.S. Privacy Shield, ZillionInfo has robust mechanisms to ensure compliance with the Principles and provides recourse for EU data subjects whose personal data have been processed in a non-compliant manner, including effective remedies. ZillionInfo complies with the Recourse, Enforcement and Liability Principle through a self-assessment system which includes internal procedures ensuring that employees receive training on the implementation of the organization's privacy policies. Compliance is periodically reviewed in an objective manner.

In conformity with the Accountability for Onward Transfer Principle of the EU-U.S. Privacy Shield, ZillionInfo acknowledges that the onward transfer of the personal data of data subjects of the EU, Iceland, Liechtenstein, and Norway will only take place (i) for limited and specified purposes, (ii) on the basis of a contract or

comparable arrangement within a corporate group and (iii) only if that contract provides the same level of protection as the one guaranteed by the Principles.

## **OTHER INTERNATIONAL VISITORS**

This Service may be hosted in the United States. If you are an international visitor, you should note that by providing your PI, you may be: (i) permitting the transfer of your PI to the United States, which may not have the same data protection laws as the country in which you reside; and (ii) permitting the use of your PI in accordance with this Privacy Policy.

## **CONTACT**

Please contact us with any questions you may have at [info@zillioninfo.com](mailto:info@zillioninfo.com)