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What This Policy Covers

This Privacy Policy applies to information that we collect about you when you use:

- Our website neotalogic.com (the “**Website**”).
- Our software the Neota Logic System, including its components Workbench and Studio (collectively, “**NLS**”).
- An instance of NLS deployed for us or a client (“**NLS Site**”).

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- Applications created with NLS and deployed on an NLS Site by us or our clients (“**Applications**”).

The Website, NLS, and Applications may be referred to collectively as “Services.”

This Privacy Policy does not apply to any NLS Site or Application that has a separate privacy policy.

Information We Collect

We collect information in two ways:

- If and when you provide information to us.
- Automatically through your use of our Services.

Information You Provide To Us

Website: When you ask that we contact you or request a demo, we collect your name, email address, and organization name, and any information you choose to enter as a note.

NLS Site: When you register, or are registered by another person or organization, as a user of an NLS Site, we collect your name, organization name, and email address. We will verify that your email address is active and correct. Unless your account is managed by an organization’s Identity Provider (i.e., via Single Sign On), we will also collect and store the password you create for your account. Your password is stored in an encrypted form. We have no means to unencrypt your password. If you submit Support Requests, we will also collect the information you provide about the problem requiring support.

Application: When you use an Application, we collect any information that you enter into the Application, as explained below.

Information We Collect Automatically

Website: We collect information that web browsers, mobile devices, and servers typically make available, such as the browser type, IP address, inferred location, device identifiers, language preference, referring site, the date and time of access, operating system, and mobile network information. We use Google Analytics, Google Adwords, Clearview Social, and Hubspot to track pages visited, time on site, information requested, referrers, and other standard web traffic behaviors. None of this information is identifiable to you.

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NLS Site: In addition to general Website information, we collect information about your usage of NLS Sites—when you log in, which Applications you use or edit in Studio, how long your Application Sessions are, and so on.

Applications: In addition to general NLS Site information, we collect the information you enter while using an Application (“**Application Data**”).

For an Application to function, Application Data must be and is stored temporarily during the Session. For example, stored data is necessary so that: (a) an answer entered on the first page of an Application can appear on or be used to determine the content of subsequent pages; and (b) you can navigate backward and forward through the Application.

Application Data is encrypted at all times. When a Session ends, Application Data is either deleted automatically or, at the direction of the owner of the NLS Site, stored for some period of time.

Information from Cookies & Other Technologies: A cookie is a string of information that a website stores on a visitor’s computer, and that the visitor’s browser provides to the website each time the visitor returns. Pixel tags (also called web beacons) are small blocks of code placed on websites and emails.

On the Website, we use cookies to track visitors’ use of the site in order to improve its effectiveness for marketing our Services. Visitors who have set their browsers to disallow cookies can still use the Website.

On NLS Site and in Applications, we use cookies only to store error or warning messages to be displayed in the browser, a web session ID/token identifying the user’s session, and success or error messages for OAuth token creation.

Information Collected by Third Parties: If an Application uses a third-party service such as DocuSign for e-signature or Stripe for credit card payments, we collect the information required for those services. In the case of Stripe, we do *not* store credit card numbers, expiration dates, or CVC codes; that data is passed directly to Stripe.

How & Why We Use Information

Location of Information

Information from the Website is stored wherever our hosting provider or Google Analytics determines, and may be copied to our internal systems for analysis.

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Information from NLS Sites and Applications is stored in the country or region directed by the owners of the NLS Sites, except that information provided to third-party services such as DocuSign and Stripe is stored wherever those services determine.

Purposes for Which We Use Information

To provide our Services—to set up, operate, secure, and back up your NLS Site and Applications.

To analyze how users interact with our Services in order improve our Services.

On the Website only—to measure and improve the effectiveness of our marketing.

Legal Bases for Collecting & Using Information

As to European Union data protection laws, our use of your information is based on the grounds that:

- (1) The use is necessary in order to fulfill our commitments to you under our Terms of Service or other agreements with you or is necessary to administer your account.
- (2) The use is necessary for compliance with a legal obligation.
- (3) The use is necessary in order to protect your vital interests or those of another person.
- (4) We have a legitimate interest in using your information—for example, to provide and update our Services, to improve our Services, and to safeguard our Services.
- (5) You have given us your consent.

Sharing Information

We share your information only in these circumstances:

Subsidiaries, Employees, and Independent Contractors: We may disclose information about you to our subsidiaries, our employees, and individuals who are our independent contractors that need to know the information in order to help us provide our Services or to process the information on our behalf. We require our subsidiaries, employees, and independent contractors to follow this Privacy Policy for all information that we share with them.

Third-Party Vendors: We may share information about you with third-party vendors who need to know information about you in order to provide their services to us, or to

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provide their services to you. This group includes vendors that help us provide our Services to you (like payment providers that process your credit and debit card information). We require vendors to agree to privacy commitments in order to share information with them.

Legal Requests: We may disclose information about you in response to a subpoena, court order, or other governmental request.

To Protect Rights, Property, and Others: We may disclose information about you when we believe in good faith that disclosure is reasonably necessary to protect the property or rights of Neota Logic, third parties, or the public at large. For example, if we have a good faith belief that there is an imminent danger of death or serious physical injury, we may disclose information related to the emergency without delay.

Business Transfers: In connection with any merger, sale of company assets, or acquisition of all or a portion of our business by another company, or in the event that Neota Logic goes out of business or enters bankruptcy, user information would likely be one of the assets that is transferred or acquired by a third-party. If any of these events were to happen, this Privacy Policy would continue to apply to your information and the party receiving your information may continue to use your information, but only consistent with this Privacy Policy.

With Your Consent: We may share and disclose information with your consent or at your request.

How Long We Keep Information

We generally discard information about you when we no longer need the information for the purposes for which we collect and use it—which are described in the section above on How and Why We Use Information—and we are not legally required to continue to keep it.

Controllers and Responsible Companies

Neota Logic's Services are worldwide. Different Neota Logic companies are the controller (or co-controller) of personal information, which means that they are the company responsible for processing that information, based on the particular service and the location of the individual using our Services.

Depending on the Services you use, more than one company may be the controller of your personal data. Generally, the "controller" is the Neota Logic company that entered into the contract with you for Services. In addition, Neota Logic Inc., our US-based company, is the controller for some of the processing activities across all of our Services worldwide.

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United States and all other countries not specifically listed below	Neota Logic Inc. 60 East 42nd Street Suite 1810 New York, NY 10165
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United Kingdom, Republic of Ireland, and countries in the European Union	Neota Logic Limited 60 Cannon Street London EC4N 6NP England
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Your Rights

If you are located in certain countries, including those that fall under the scope of the European General Data Protection Regulation (the “GDPR”), data protection laws give you rights with respect to your personal data, subject to any exemptions provided by the law, including the rights to:

- Request access to your personal data.
- Request correction or deletion of your personal data.
- Object to our use and processing of your personal data.
- Request that we limit our use and processing of your personal data.
- Request portability of your personal data.

For information, please send email to support@neotalogic.com.

EU individuals also have the right to make a complaint to a government supervisory authority.

How to Reach Us

If you have a question about this Privacy Policy, or you would like to contact us about any of the rights mentioned in the Your Rights section above, please send email to support@neotalogic.com.

Transferring Information

Because Neota Logic’s Services are offered worldwide, the information about you that we process when you use the Services in the EU may be used, stored, and/or accessed

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by individuals operating outside the European Economic Area (EEA) who work for us, other members of our group of companies, or third-party data processors. This is required for the purposes listed in the How and Why We Use Information section above. When providing information about you to entities outside the EEA, we will take appropriate measures to ensure that the recipient protects your personal information adequately in accordance with this Privacy Policy as required by applicable law.

You can ask us for more information about the steps we take to protect your personal information when transferring it from the EU.

Privacy Policy Changes

Neota Logic may change its Privacy Policy from time to time. If we make changes, we will notify you by revising the change log below, and, in some cases, we may provide additional notice (such as adding a statement to our Website or an NLS site). Your further use of the Services after a change to our Privacy Policy will be subject to the updated policy.

Change Log

Revised May 30, 2018

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