



Last updated: **August 2020**

This document (“Privacy Policy”) outlines how Twenty5 LLC (“Twenty5”, “we”, “us”, “our”) uses and protects data collected through Twenty5’s proprietary software and services available on our web-site (“Service”) at [www.twenty5.com](http://www.twenty5.com), [app.twenty5.com](http://app.twenty5.com) and other related web-sites (“Sites”). This Privacy Policy is incorporated into Twenty5’s End User License Agreement.

Protecting personal data is a core value of Twenty5’s. You should read this document to understand your options regarding our use of:

- Information that specifically identifies an individual or is linked to such identifying personal information that you enter into our Sites (“Personal Data”)
- Anonymous aggregated information that may be based on Personal Data but which does not identify any individual and is normally summarized (“Anonymous Data”)
- Business transaction data that is of a proprietary nature to your business which you input to the Service as part of your normal usage (“Proprietary Data”)

Anonymous Data that is combined with Personal Data is Personal Data and Anonymous Data that is combined with Proprietary Data is Proprietary Data.

We may update this Privacy Policy from time to time, and we will post any updates to our Site. If you have any questions or concerns about this Privacy Policy please contact us at [support@Twenty5.com](mailto:support@Twenty5.com). By using the Service, you consent to our latest published Privacy Policy.

## 1. Collection and Use of Data

When you register for or use the Service, or as part of our relationship with you, you may be asked to provide Personal Data. You may also at your discretion use our Service to track and manage the Personal Data of others, such as your contacts or customers. If you register for electronic payment for the Service, we may collect necessary billing and financial information which is then held by a third-party payment service provider.

If you use the Service on-premise or hosted by you at your selected hosting service provider, then your Proprietary Data will not be held by us or retained on our servers. If you use the Service from our cloud-based application platform then you are consenting to store Proprietary Data in our servers accessed via the internet or from the cloud.

The Personal and Proprietary Data we collect allows us to provide the Service to you and is collected primarily to help you use the Service and gain access to information you have requested. In addition, the Personal Data we collect may be used to help us improve the Service, to better respond to your requests for help or support, to send you important notices such as changes to terms and to keep you informed about upcoming features. You may opt out of our mailing list and stop receiving information of a promotional nature from us at any time.

Anonymous Data may be collected through your use of the Service or as a result of visiting our Sites, or created by us through aggregation of Personal Data and Proprietary Data in such a way that none of the Personal or Proprietary Data remains as part of Anonymous Data. Anonymous Data may be used for any purpose, including to help us



better understand customer behavior, gain feedback on the usage of our Services, to improve the Service for example in the development of new features, and for our own internal auditing, data analysis, marketing and research purposes.

Cookies and related technologies are small data files stored on your device or computer at the request of a web-site to enable that web-site to recognize the user via their device, and retain certain preferences for that user, for example remembering their username and password for a limited time-period for convenience. We treat non-personal information such as IP addresses and geo-locations collected via cookies as Anonymous Data, unless it is combined with Personal Data or unless it is considered personal information by local law. You may block, or receive warnings about cookies at any time through your web browser preferences – please refer to the help documentation on your specific browser for more information. We use cookies for your convenience when you repeatedly use the Service and we cannot guarantee access to all features of the Service if you block cookies in your browser.

Emails sent automatically by the Service may include clickable buttons or texts which when clicked perform certain updates or notifications to the Service for your convenience. We may track your usage of click-through email texts.

Our web-site may be linked to services provided by third parties not owned or operated by Twenty5 who assist us in delivering the Service, such as SAP™ (“Third Parties”). Your disclosure of Personal Data to Third Parties is normally subject to the privacy policies of the Third Party, and we do not have control over their web-sites. Any Personal Data that we send to or receive back from the Third Party without your knowledge shall however be subject to the terms of this Privacy Policy.

## **2. Protection of Your Data**

Twenty5 takes precautions to ensure physical, procedural, and technical safeguards to preserve the integrity and security of your Personal and Proprietary Data, and to prevent any loss, theft, unauthorized access, deletion or mis-use of Personal, Proprietary or Anonymous Data. The Service uses Secure Sockets Layer (SSL) encryption for our web-pages, and you must use an SSL-enabled browser to access the Service. We operate on the principle that Twenty5’s employees, agents and contractors must have a reasonable business need to access any Personal or Proprietary Data.

Twenty5 only shares Personal and Proprietary Data with Third Parties that require such information so that we or they may deliver the Service. We have controls in place to prevent one organization from viewing or updating the data belonging to another organization, beyond basic access rights inherent with interfaces, when electing to collaborate, or share documents.

Personal and Proprietary Data is shared by default with other members of your organization using the Service or with other persons whom you have invited to use the Service on behalf of your organization, subject to the role based authorization concepts built into our Service to limit the access to categories of documents based on company code and owner (“Authorizations”). By default your data is not accessible to users of the Service who have not registered on behalf of your organization, except for persons you are knowingly sharing your Personal Data with or members of a forum or conversation in which you share Personal Data.



We will not share Personal or Proprietary Data with Third Parties for their own internal business or marketing purposes. We may disclose Personal Data if we are legally required to do so, or if it is reasonably necessary to comply with a law or legal authority, or to protect the rights, property or safety of the Service including protection from fraudulent, abusive or unlawful use of the Service. In the event that another company acquires all or substantially all of the assets of our business through a consolidation, merger, asset purchase, or other transaction by operation of law or fact, we reserve the right to transfer all data that is in our possession or under our control to such acquiring party, with such data remaining subject to this Privacy Policy.

We will provide you access to Personal and Proprietary Data collected from you so that you may correct, amend or delete that information. We will not alter your Personal or Proprietary Data without your prior consent. We will make best efforts to notify you promptly as soon as we are aware of any data security breach or unplanned disclosure involving your Personal or Proprietary Data.

You may choose not to provide Personal Data to our Service, which may in turn prevent you from using the Service. You may opt out of promotional and marketing materials but we may still send you critical notices that require action or notification as part of your continued use of the Service, such as password reset emails. Ultimately you provide Personal and Proprietary Data to us and to Third Parties at your own risk and you should be careful in giving out your data to any external party.

The Service is not directed to persons under 13 years of age and we will not knowingly collect any Personal Data from persons under 13 years of age. Protecting the privacy of children is particularly important and we will delete Personal Data of persons under 13 years of age that we are aware of, unless express consent is given by a parent or guardian to retain such data.

### **3. United States and Safe Harbor**

The Service is hosted in the United States and Personal and Proprietary Data you provide to us may be accessed in any country, subject to the terms of this Privacy Policy. We have not yet applied for registration under the United States Department of Commerce Safe Harbor Privacy Principals (the “Safe Harbor Principals”), however, we intend to make reasonable commercial efforts to abide by the frameworks of the Safe Harbor Principals, regarding notice, choice, transfer, security, data integrity, access, collection, use and retention of Personal Data. As such, we are not in compliance with the US-EU Safe Harbor Framework and the US – Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding collection, use and retention of Personal Data from the EU and Switzerland.

Before transferring any protected data from any jurisdiction outside the US to Twenty5, you must assure that it is in compliance with any applicable local laws, rules, regulations, orders and the like. We shall not be responsible for assuring any such compliance and will rely on you to determine the appropriateness and legality of any transfer of Personal Data.