



Privacy Policy

This website is owned and administered by Adtrib Inc. (“Adtrib” or “we”). Protecting consumer privacy is important to Adtrib. We established a comprehensive privacy program to help us respect and protect the personal information of individuals that we receive from businesses and companies to which we provide products and services (such businesses and companies are referred to in this Privacy Policy as “Our Customers”).

This statement includes both Adtrib’s European Union–U.S. Privacy Shield and Switzerland–U.S. Privacy Shield Privacy Statement and the Website Privacy Statement.

EU–U.S. Privacy Shield and Switzerland–U.S. Privacy Shield Privacy Statement

Adtrib complies with the EU–U.S. Privacy Shield Framework and the Switzerland–U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. Adtrib has certified that it adheres to the Privacy Shield Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Privacy Shield program, and to view Adtrib’s certification, please visit <http://www.privacyshield.gov>.

A full list of Privacy Shield participants and their assigned dispute providers can be found on the Department of Commerce web site at: <https://www.privacyshield.gov/list>

Adtrib's Privacy Shield Policy, detailing additional specifics from Privacy Shield Principles in conjunction with this privacy policy, can be found here: <https://www.maestroqa.com/privacyShield>.

Questions or complaints regarding Adtrib’s compliance with the Privacy Shield Principles should be first directed to Adtrib via one of the methods listed in the **Contacting Us** section. Adtrib has further committed to refer unresolved Privacy Shield complaints to JAMS (<http://www.jamsadr.com>), an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgement of your complaint from us, or if we have not addressed your complaint to your satisfaction, please contact or visit JAMS for more information or to file a complaint. The services of JAMS are provided at no cost to you. EU and Swiss citizens can also, after contacting both Adtrib and JAMS for dispute resolution resulting in

no acknowledged outcome, enter into binding arbitration to resolve a specific, individual complaint.

Adtrib Website Privacy Statement

Adtrib is committed to respecting and protecting your privacy and strives to keep your personal information secure. Our Terms of Service covers the collection and use of information obtained through websites on which this notice appears as well as the information we collect and process at the direction of Our Customers and through their use of our services. If you have questions or complaints regarding our privacy notice, terms, or practices, please contact us.

Links to Non-Adtrib Websites

Our website may provide links to third-party websites for your convenience and information. If you access those links, you will leave our website. We do not control those websites or their privacy policies or practices, which may differ from ours. We therefore encourage you to review the privacy policies of third-party companies and websites before submitting any personal information to them.

Personal Information We Collect

We collect personal information in two ways:

First is information you give us. This is information you provide through our service or otherwise communicate with us and may include:

- identity information, such as your name, title, date of birth and gender;
- contact information, such as your email address and telephone number;
- profile information, such as your interests, preferences, feedback and survey responses.

The second way is information we get from others. We may obtain additional information about you from our partners or third-party sources to enrich your experience on our website and provide you with more relevant information related to our service offerings.

Non-Personal Information We Collect

We collect information about use of our website, about the browser type and IP address used to visit our website, and about any website from which someone may have been

linked to or referred to our website, or to a site which someone may be linked to or referred to from our website. This non-personal information is aggregated for reporting on usability, performance and effectiveness. It is used to improve the customer experience and the usability and content of our website and the services and products we provide.

This collection may be implemented by our website via cookies. Users can control the use of cookies at the individual browser level.

Data Security

Adtrib will take responsible steps to protect information and has implemented appropriate physical, electronic, and managerial procedures to safeguard, secure and protect information from loss, misuse, unauthorized access, disclosure, alteration and destruction from malicious or unintentional action. However, the Company cannot completely guarantee the security of information on or transmitted via the Internet. Please contact us for more information or for our security processes documentation.

Data Retention

We only retain your personal information for as long as is necessary to fulfil the purposes for which it was collected. This may include satisfying any legal, accounting, or reporting requirements.

The appropriate retention period for personal information is determined with consideration of the nature of the personal information and the assessed risk from unauthorized use or breach of the personal information and the applicable legal requirements.

US law requires us to keep basic information about our customers for six years after they cease being customers for tax and auditing purposes.

In some circumstances we may anonymize personal information and use this information indefinitely without further notice to you.

Purpose of Personal Information Use

We use personal information in in the following ways:

To provide our software as a service product MaestroQA (the Service) - If you have a MaestroQA account, we use your personal information:

- To operate, maintain, administer and improve the Service

- To manage and communicate with you regarding your Service account, including Service announcements, alerts, notices, updates, and support messages
- To respond to Service-related requests, questions, comments and feedback.

To communicate with you - If you request information from us, register for the Service or any of our associated free products, participate in our surveys or promotional content or events, we may send you Adtrib-related marketing communications. We will provide the ability to opt out.

To comply with law - We may use your personal information as we believe necessary or appropriate to comply with applicable laws and legal process, such as to respond to subpoenas or requests from government authorities.

With your consent - We may use or share your personal information with your consent or as directed by you, such as consenting to posting your testimonials or endorsements.

To create anonymous data for analytics - We may create anonymous data from your personal information by removing any personally identifiable information for the purpose of analytics.

For compliance, fraud prevention and safety - We may use your personal information as we believe appropriate to (a) enforce the terms and conditions of the Service; (b) protect our rights, privacy, safety or property, and/or that of you or others; and (c) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity.

Personal Information Sharing

We do not share or sell the personal information that you provide us with other organizations without your express consent, except as described in this Privacy Policy. We disclose personal information to third parties under the following circumstances:

- **Service Providers.** We may employ third party companies and individuals to administer and provide a service such as customer support, monitoring services, or customer relationship management. These third parties are permitted to use your personal information only to perform these tasks in a manner consistent with this Privacy Policy and are obligated not to disclose or use it for any other purpose.
- **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.
- **Compliance with Laws and Law Enforcement; Protection and Safety.** Adtrib may disclose information about you to government or law enforcement officials or private parties as required by law, and disclose and use such information as we believe necessary.

- In the event that Adtrib, Inc. is acquired by or merged with a third party entity, we reserve the right, in these circumstances, to transfer or assign your personal data we have collected from you as part of such merger, acquisition, sale, or other change of control. In the unlikely event of our bankruptcy, insolvency, reorganization, receivership, or assignment for the benefit of creditors, or the application of laws or equitable principles affecting creditors rights generally, we may not be able to control how your personal information is treated, transferred, or used.

Access to Information

Whenever we collect your personal information, we take steps to help ensure that it is accurate, complete, and up-to-date. You may request access to such personal information about yourself that Adtrib holds by contacting us. Additionally, if your personal information changes, or if you believe the information Adtrib holds is inaccurate, you may request to correct, update, amend or delete/remove inaccurate information by contacting us.

Children Policy

We do not knowingly acquire or receive personal information from children under 13. If we learn that any user of our Service is under the age of 13, we will take appropriate steps to remove that user's information from our account database and will restrict that individual from future access to the Service.

Automated Decision-Making

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

Subprocessors

Adtrib may contract sub processors to aid in delivering its service. We impose data protection terms with each Subprocessor regarding their security controls and applicable regulations for the protection of personal data to ensure they meet the standards of security set forth here.

List of sub processors:

Processor Name	Processor Type	Processor Location
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Enforcement

Adtrib uses a self-assessment approach to assure compliance with this privacy policy and to periodically verify the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented and accessible and in conformity with Privacy Shield Principles. In addition to self-assessments, Adtrib is also subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

We encourage interested persons, including those in the EU, to use the contact information provided with questions or concerns about their personal data. We will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of Personal Information in accordance with the Principles.

If a complaint or dispute cannot be resolved through our internal process, we agree to dispute resolution using the U.S.-based JAMS (<http://www.jamsadr.com>).

Finally, as a last resort and in limited situations, EU and Swiss individuals may seek redress from the Privacy Shield Panel, a binding arbitration mechanism.

In compliance with the Privacy Shield Principles, Adtrib commits to resolve complaints about your privacy and our collection or use of your personal information. EU and Swiss individuals with a question or concern about the use of their Personal Data should contact Adtrib.

Adtrib has further committed to refer unresolved privacy complaints to JAMS, an independent and alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgement of your complaint from us, or if we have not addressed your complaint to your satisfaction, please contact JAMS (<http://www.jamsadr.com>) for more information and to file a complaint. The services of JAMS are provided at no cost to you.

Information Subject to Other Policies

Adtrib is committed to following Privacy Shield Principles for all Personal Information within the scope of the Privacy Shield Agreement. If Adtrib is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice

on our websites of any change in ownership or proposed uses of your personal information, as well as any choices you may have regarding your personal information.

Acceptance of Privacy Policy

By using our website, you are accepting and agreeing to all of the privacy policies and practices described in this Privacy Policy and our Terms of Service.

Contacting Us

If you have any comments or questions about this Privacy Policy, please send them to team@maestroqa.com. We will respond to all queries within 30 days.

Additional Information and Rights For EU Users

References to “personal information” in this Privacy Policy are equivalent to “personal data” governed by European data protection legislation.

Our Data Protection Officer can be reached at team@maestroqa.com

Your rights

European data protection laws give you rights regarding your personal information. You may request these actions for your personal data:

- **Access.** Provide you with additional information about our processing of your personal information and provide you access to your personal information.
- **Correct.** Update or correct any inaccuracies in your personal information.
- **Delete.** Delete your personal information from our system.
- **Transfer.** Transfer a machine-readable copy of your personal information to you and/or a third party of your choice.
- **Restrict.** Restrict processing of your personal information.

You can submit these requests by email to team@maestroqa.com or by mail to our postal address, 41 East 11th Street, 11th Floor, New York, NY, 10003. If you would like to submit a question or complaint about our use of your personal information or request response, contact us at team@maestroqa.com.

Cross-Border Data Transfer

To transfer your personal information out of the EEA to countries not deemed by the European Commission to provide an adequate level of personal information protection, we ensure one of the following is in place, recognized by the European Commission as providing adequate protection for personal information, where required by EU data protection legislation:

- The third party participates in the E.U.-U.S. Privacy Shield Framework
- For transfers to third parties outside of the United States or inside the United States not falling under the E.U.-U.S. Privacy Shield Framework, contracts approved by the European Commission which impose data protection obligations on the parties to the transfer must be in place.

Please contact us for further information on the specific mechanisms used by us when transferring your personal information out of the EEA.