

Last Updated: January 6, 2020

MaestroQA, Inc. ("MaestroQA", "us", "we", "our") is committed to respecting and protecting your privacy while providing you with a positive experience on our website (the "Website") and in using our Customer Service Quality Assurance Platform (the "Services"). This Privacy Notice (the "Notice") explains our privacy practices and provides information on how and why we collect, use and share personal information from our website visitors, our subscribers, our subscribers' customers, and end users of our Services (collectively "you", "your"), your rights in relation to your personal information and how to contact us in the event you have a complaint or query. MaestroQA's Privacy Notice applies to our Website and Services that link to or reference this Notice.

## Quick Links

We recommend that you read this Notice in full to ensure you are fully informed. However, if you only want to access a particular section of this Notice, then you can click on the relevant link below to jump to that section.

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## Useful Terms

"Customers" means customers of Subscribers who receive customer support from Subscribers which such communications are monitored through the Services.

"Permitted Users" means individuals who have been given access to a Subscriber's account by a Subscriber. Permitted Users may include a Subscriber's employees and contractors.

"Personal information" means any information or data relating to an identified or identifiable natural person or household (an "identifier") that we process in connection with our Website and Services; an identified or identifiable natural person or household is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person or household. Personal Information does not include data where the identity has been removed (i.e. anonymous data).

"Subscriber" means any of our clients (including the individuals working for our Subscribers, such as Permitted Users) to whom we provide the Services. This also includes prospective Subscribers, such as contacts with whom we have communicated but have not yet engaged us to provide Services.

"Website Visitors" means individuals who visit our Website and who may opt to provide us with personal information to request a free trial or to receive marketing communications from MaestroQA.

## Information we collect

Categories of Personal Information we collect:

We may collect, use, store and transfer different kinds of personal information about 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;

Financial Data, such as credit card and/or billing information so that we can charge you for the Services; credit card payment information, transactional information (including Services purchased);

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 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 this Website or the Services;

Usage Data, such as information about how you use our Website or the Services.

## How We Collect your Personal Information

Directly from you. We may ask you to provide certain personal information when you create a MaestroQA account, when you use certain parts of our Website and Services, when you attend our events and webinars, when you interact with us at a conference or correspond with us in person, by phone, email or otherwise.

From Subscribers if you are a Permitted User or Customer. We may collect personal information about you from the Subscriber if you are a Permitted User of the Services or because you have interacted with Subscribers or their Permitted Users through our Services as a Customer of a Subscriber.

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 Subscriber, Permitted User, or contact who considers our Services would be of interest to you.

Information we collect automatically. When you visit our Website or use our Services, we may collect certain information automatically from your device through the use of cookies or similar technologies (see below).

Cookies and other technologies. We may use cookies and other information-gathering technologies to learn more about how you interact with our Website and the Services. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our Website may become inaccessible or not function properly. For more information about the cookies and similar technologies we use, please see our Cookie Notice.

## What Personal Information We Collect About You

Subscribers and their Permitted Users. We collect Identity Data, Contact Data, Profile Data, Financial Data and Marketing and Communications Data about you or other relevant individuals at your organization (such as Permitted Users), in the course of setting up your account and providing the Services to you. We also automatically collect Technical Data and Usage Data about you when you access our Services or interact with the Website through our use of cookies and similar technologies, as described above. This information is aggregated for reporting on usability, performance and effectiveness. It is also used to improve the customer experience and the usability and content of our Website and the Services we provide.

Individuals who interact with MaestroQA personnel. We may also collect Identity Data, Contact Data, Profile Data and Marketing and Communications Data about you when you register for and/or attend a MaestroQA webinar, sponsored event or other events at which MaestroQA participates to facilitate your registration or attendance at a webinar or an event, including sending related communications to you.

Website Visitors. Where you choose to provide us with such information, we collect Identity Data and Contact Data about you when you submit web forms on our Website, such as when you request a free trial and we collect Marketing and Communications Data where you sign up to receive email newsletters from us. We also automatically collect Technical Data and Usage Data about you through our use of cookies and similar technologies, as described above.

Our Subscribers Customers. When you contact a Subscriber or Permitted Users for customer support we collect the information you share with a Subscriber which may include Identity Data, Contact Data, Profile Data, and Financial Data.

We also may collect Technical Data and Usage Data. We use this information in connection with providing our Services to our Subscribers. For example, we use this information to enable Subscribers to track and analyze their customer service personnel.

## How do we use your personal information?

### Subscriber and its Permitted Users

We use your personal information:

To provide the Services.

To you have a MaestroQA account:

To operate, maintain, and administer the Services and support;

To manage and communicate with you regarding your Service account, including Service announcements, alerts, notices, updates, and support messages; and

To respond to Service-related requests, questions, comments and feedback.

To administer and manage our business relationship with you.

To send you information which we think you may find interesting (such as details about our products and services, new features, market research, reports and other relevant content), in accordance with your marketing preferences.

To improve the Services we provide you.

To comply with applicable laws, regulatory requirements 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 aggregate and de-identified data for analytics.

For compliance, fraud prevention and safety. This may include using your personal information as we believe appropriate to (a) enforce the terms and conditions of the Services; (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.

### Website Visitors

To respond to your inquiries, such as a request for information about our Services.

To send you information which we think you may find interesting (such as details about our products and services, new features, market research, reports and other relevant content), in accordance with your marketing preferences.

To administer and protect our Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).

To deliver relevant website content to you and to measure and understand the effectiveness of the content we serve to you.

To use data analytics to improve our Website, content, marketing and user experience.

For compliance, fraud prevention and safety. This may include using your personal information as we believe appropriate to (a) enforce the terms and conditions of the Services; (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.

For any other purposes about which we notify and receive your consent from you;

### Other Individuals who Interact with MaestroQA Personnel

To respond to your inquiries, such as a request for information about our Services.

To send you information which we think you may find interesting (such as details about our products and services, new features, market research, reports and other relevant content), in accordance with your marketing preferences.

For any other purposes about which we notify and receive your consent from you;

## Sharing and disclosure of information to third parties

We will not rent or sell personal information about you. We may share and disclose your personal information that we collect with the following third parties, solely for a legitimate business or legal purpose and in accordance with applicable law. Note that, for California residents, we define "sale" and "personal information" in accordance with applicable California law.

Business partners, contractors, vendors, and authorized third party agents. We may employ third-party companies and individuals to administer and provide a service on our behalf such as:

Customer support, monitoring services, or customer relationship management;

Operation, delivery, improvement and customization of our Services;

Operational and marketing communications related to our Services;

Enforcement of our acceptable use policy.

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.

Compliance with Laws and Law Enforcement, Protection and Safety. We may disclose information to law enforcement agencies, regulatory or governmental bodies, or other third parties in order to: respond to legal process; comply with any legal obligation; protect or defend our rights, interests or property or that of third parties; or prevent or investigate wrongdoing in connection with the Website or our Services.

Business transfers. In the event of a reorganization, actual, sale, merger, acquisition, financing or reorganization of our business, we reserve the right, in these circumstances, to transfer or assign your personal information we have collected from you as part of such contemplated or actual transaction. If a change happens to our business, the new owners may use your personal information in the same way as set out in this Notice.

These third parties are required to respect the security of your personal information and to treat it in accordance with law. They are permitted to use your personal information only to perform these tasks in a manner consistent with this Notice and are obligated not to disclose or use it for any other purpose.

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.

## Third-party sites

This Notice does not apply to, nor are we responsible for, the privacy, information or other practices of any third party operating any site or service to which the Website links including, but not limited to, social media sites. The inclusion of a link on the Website does not imply our endorsement of the linked site or service. We therefore encourage you to review the privacy policies of third-party companies and websites before submitting any personal information to them.

## 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, in 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.

## 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.

## International data transfers

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. Specifically, information collected outside the United States, including in the European Economic Area ("EEA"), may be transferred to and stored on our servers in the United States. These countries may have data protection laws that are different to the laws in your country (and in some cases, may not be as protective).

MaestroQA complies with the Privacy Shield Principles for all onward transfers of personal information from the EU, the UK, and Switzerland, including the onward transfer liability provisions. In respect of personal information originating from the EU and Switzerland, MaestroQA has self-certified to the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks. Please click here to view our Privacy Shield Notice.

## Children's privacy

We do not knowingly acquire or receive personal information from children. If we learn that any user of our Services is under the age of 16, 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 Services.

## Removal from marketing communications

You will receive marketing communications from us if you have requested information or purchased services 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](mailto:privacy@maestroqa.com). Please note that opting out of marketing communications does not opt you out of receiving important business communications, such as security updates or service announcements.

## Automated Decision-Making

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

## California do not track disclosures

Your browser settings may allow you to automatically transmit a "Do Not Track" signal to websites and online services you visit. We currently do not recognize browser "Do Not Track".

## Additional privacy rights for California residents

### California Residents

If you are a California resident and use our Services or visit our Website solely as a private individual—in other words, not as the member or representative of a company or other organization—you may have the right to receive a free, yearly accounting of:

(1) information identifying each third-party company to whom we may have disclosed, within the past year, personal information pertaining to you for our direct marketing purposes; and

(2) a description of the categories of personal information disclosed. If you are a California resident who qualifies to receive such an accounting and would like to make one, please email [privacy@maestroqa.com](mailto:privacy@maestroqa.com). Please Note: we do not engage in the sale of personal information within the meaning of California law.

## Additional information for EEA individuals

### Your rights

Individuals located in 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 to transfer a machine-readable copy of your personal information to you and/or a third party of your choice.

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 to respond for processing of personal information.

Withdraw. Withdraw your consent to our processing of your personal information, where we have collected and processed it with your 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](mailto:privacy@maestroqa.com). Please note that your request is particularly to all legitimate requests within one month. Occasionally it may take us longer than a month if your query is especially 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](mailto: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 general, when processing personal information to provide our Services, we do so only on behalf of Subscribers and in accordance with their instructions. This means that if you wish to access, review, modify or delete any personal information we process on behalf of a Subscriber, under applicable EEA law or otherwise, you should contact that Subscriber with your request. We will then help them to fulfill that request in accordance with their instructions.

If you are located in the EEA, you have the right to lodge a complaint with a supervisory authority, in particular in the European Union (or EEA) state where you work, normally live or where any alleged infringement of data protection laws occurred.

If we have collected and processed your personal information with your consent and it is protected by EEA law, then you can withdraw your consent at any time. 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.

## Legal basis for processing your personal information

Subscribers and Permitted Users. Where we process your personal information in connection with providing the Services to you, we consider that this processing is necessary to perform the contract we have entered into with you.

Where we process your personal information to operate your account, administer and manage our business relationship with you, for other business purposes, for marketing purposes or for fraud prevention and safety purposes, we consider this is necessary for our legitimate interests and that your data protection interests and fundamental rights and freedoms do not override those interests.

We rely on your consent where we use or share personal information for the purposes of posting your testimonials or endorsements.

We will rely on legal obligation if we are legally required to process your personal information to comply with applicable legal or regulatory requirements, such as disclosures to regulators and for the purposes of disputes or legal proceedings affecting us.

Website Visitors. Where we process your personal information for the purposes described above, we consider this is necessary for our legitimate interests and that your data protection interests and fundamental rights and freedoms do not override those interests.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us at [privacy@maestroqa.com](mailto:privacy@maestroqa.com).

## EU-US, Privacy shield and Switzerland-US, privacy shield, privacy statement

MaestroQA complies with the EU-US Privacy Shield Framework and the Switzerland-US 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. MaestroQA has certified that it adheres to the Privacy Shield Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. If there is any conflict between the policies in this privacy policy and data subject rights under the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view MaestroQA'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>.

Disclosures for National Security or Law Enforcement. Under certain circumstances, we may be required to disclose your personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Legal Requirements. We may disclose your personal information if required to do so by law in order to (for example) respond to a subpoena or request from law enforcement, a court or a government agency, or in the good faith belief that such action is necessary (a) to comply with a legal obligation, (b) to protect or defend our rights, interests or property or that of third parties, (c) to prevent or investigate possible wrongdoing in connection with the Services, (d) to act in urgent circumstances to protect the personal safety of Users of the Services or the public; or (e) to protect against legal liability.

Onward Transfers. If we have received your personal information in the United States and subsequently transfer that information to a third party agent or service provider for processing, and such third party agent or service provider processes your personal information in a manner inconsistent with the Privacy Shield Principles, we remain responsible and liable under the Privacy Shield Principles unless we can prove we are not responsible for the event giving rise to the damage.

Enforcement. MaestroQA uses a self-assessment approach to assure compliance with this privacy notice 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 ("Principles"). In addition to self-assessments, MaestroQA is also subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

Dispute Resolution. In compliance with the Privacy Shield Principles, MaestroQA commits to resolve complaints about your privacy and our collection or use of your personal information transferred to the United States pursuant to Privacy Shield. European Union and Swiss individuals with Privacy Shield inquiries or complaints should first contact Maestro QA through the addresses set forth in the "Contact Us" Section of this Privacy Notice. We will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of personal information in accordance with the Principles.

Maestro QA has further committed to refer unresolved privacy complaints to an independent dispute resolution mechanism using the U.S.-based JAMS (<http://www.jamsadr.com>). If you do not receive timely acknowledgement of your complaint, or if your complaint is not satisfactorily addressed, please visit (<http://www.jamsadr.com>) for more information and to file a complaint, this service is provided free of charge to you. If your Privacy Shield complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms click here for more information.

Information Subject to Other Policies. MaestroQA is committed to following the Principles for all personal information within the scope of the Privacy Shield Agreement. If MaestroQA 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.

## Updates to this notice

We may update this Notice from time to time in response to changing legal, technical, or business developments. If we change our Notice, 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 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

Our Data Protection Officer ("DPO") is responsible for overseeing questions in relation to this Notice.

If you have any questions, comments or concerns about this Notice, please e-mail our DPO at [privacy@maestroqa.com](mailto:privacy@maestroqa.com). Or, you can write to us at:

MaestroQA, Inc.  
Attn: Data Protection Officer  
33 West 17th Street, 8th Floor  
New York, NY 10011