

Privacy policy

Effective as of August 29, 2016.

At ANCILE, we respect and protect the privacy of visitors to our website, www.ANCILE.com (together with the other websites we own and control, the “ANCILE Websites”), and our customers who use our on-demand services offered on the ANCILE Websites (together with the ANCILE Websites, the “Service”). This Privacy Policy (“Policy”) explains how we collect and use visitors’ and customers’ information, particularly personal information, as part of the Service. The information ANCILE collects and uses is limited to the purpose for which customers engage ANCILE and other purposes expressly described in this Policy. Any discussion of your use of the Service in this Policy is meant to include your visits and other interactions with the ANCILE Websites, whether or not you are a user of ANCILE’s on-demand services.

Privacy Certifications

To mark its commitment to privacy, ANCILE complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce and European Commission regarding the collection, use and retention of personal information from EU member countries. We have certified our adherence to the Privacy Shield Principles of Notice; Choice; Accountability for Onward Transfer; Security; Data Integrity and Purpose Limitation; Access; and Recourse, Enforcement and Liability. To learn more about the Privacy Shield program, and to view ANCILE’s certification, please visit <http://www.privacyshield.gov/>. If you have questions or complaints regarding our Policy or practices, please contact us at legal@ancile.com.

What do we mean by Personal Information?

In this Policy, “personal information” means information or an information set that identifies or could be used by or on behalf of ANCILE to identify an individual. Except as described in this Policy, ANCILE will not give, sell, rent or loan any personal information to any third party.

Personal information does not include “Usage Data” which we

define as encoded or anonymized information or aggregated data we collect about a group or category of services, features or users which does not contain personally identifying information. Usage Data helps us understand trends in usage of the Service so that we can better consider new features or otherwise tailor the Service. In addition to collecting and using Usage Data ourselves, we may share Usage Data with third parties, including our customers, partners and service providers, for various purposes, including to help us better understand our customers’ needs and improve the Service as well as for advertising and marketing purposes. We do not share Usage Data with third parties in a way that would enable them to identify you personally.

How Do We Collect, Use and Share Your Personal Information and Other Information? Information You Provide to Us

When you register for the Service, we ask for personal information such as your name, address, phone number, and e-mail address, as well as certain related information like your company name and website name. If you sign-up for a 30-day free trial account, you are not required to enter your credit card information unless and until you decide to continue with a paid subscription to the Service. ANCILE uses a third-party intermediary to manage credit card processing. This intermediary is not permitted to store, retain, or use your billing information for any purpose except for credit card processing on ANCILE’s behalf.

ANCILE may use the personal information you provide to operate the Service and tailor it to your needs, for billing, identification and authentication, to contact and communicate with you about the Service and your use of the Service, send you marketing materials (subject to your opt-out option), for research purposes, and to generally improve the content and functionality of the Service.

ANCILE may also share your personal information with its third-party service providers (such as its credit card processors and

hosting partners) to provide the necessary hardware, software, networking, storage, and other services we use to operate the Service and maintain a high quality user experience. We do not permit our service providers to use the personal information you provide for their marketing purposes.

Log Files

As is true with most websites, ANCILE gathers certain information automatically and stores it in log files. This information includes internet protocol addresses as well as browser, internet service provider, referring/exit pages, operating system, date/time stamp, and click stream data. Occasionally, we may connect personal information to information gathered in our log files, as necessary to improve the Service for individual customers. Otherwise, we generally use this information as we would any Usage Data, to analyze trends, administer and maintain the Service, or track usage of various features within the Service.

Customer Testimonials/Comments/Reviews

From time to time, we post customer testimonials on the ANCILE Websites which may contain personal information. We obtain the customers' consent to post their names along with their testimonials.

Cookies

A "cookie" is a small software file stored temporarily or placed on your computer's hard drive. The main purpose of a cookie is to allow a web server to identify your computer and web browser, and tailor web pages and/or login information to your preferences. Cookies help us promptly display the information you need to use the capabilities of the Service and other information which we consider to be of interest to you. By gathering and remembering information about your website preferences through cookies, we can provide a better web and marketing experience. Cookies don't give us access to users' computers, and the information we collect through cookies doesn't include personal information.

When you use the Service we utilize "session cookies," which allow us to uniquely identify your browser while you are logged in and to process your online transactions. Session cookies disappear from your computer when you close your web browser or turn off your computer. We also utilize "persistent cookies" to identify you as a ANCILE customer or end user and make it easier for you to log into and use the Service. Persistent cookies remain on your computer after you close your web browser or

turn off your computer.

We utilize various categories of cookies, which are summarized below along with the options available to you to manage them.

Essential: Essential cookies are those that are critical to the functionality of the Service. We use these cookies to keep a user logged into the Service and remember relevant information when the user returns to the Service.

Functional: We use functional cookies to track users' activities in the Service, understand their preferences and improve their user experience. These cookies can also be used to remember configurations of the Service that you can customize.

Marketing: We engage third party providers to serve a variety of marketing cookies that enable us track and analyze usage, navigational and other statistical information from visitors to the ANCILE Websites. This information does not include personal information though we may reassociate this information with personal information we have collected when it is received. Marketing cookies are also used to track the performance of our advertisements and are employed by third party advertising networks that we utilize. These ad networks follow online activities of visitors to the ANCILE Websites and use this information to inform, optimize and serve tailored advertisements on the ANCILE Websites or on other websites you visit that we believe would most effectively promote the Service to you. We also use third parties to collect information that assists us in other methods of "remarketing" our Service to visitors to the ANCILE Websites, including customized email communications.

You can generally accept or decline the use of cookies through a functionality built into your web browser. If you want to learn more about cookies, or how to control or delete them, please visit <http://www.aboutcookies.org> for detailed guidance. Please note that if you do elect to disable your web browser's ability to accept cookies, you may not be able to access or take advantage of many features of the Service.

Many jurisdictions require or recommend that website operators inform users as to the nature of cookies they utilize and, in certain circumstances, obtain the consent of their users to the placement of certain cookies. If you are a customer of ANCILE, it is your responsibility to inform the individuals with whom you interact using the Service as to the types of cookies utilized in the Service and, as necessary, to obtain their consent. If you

require more specific information as to the nature of the cookies utilized in the Service for purposes of fulfilling these obligations, please contact us by email at legal@ancile.com.

Web Beacons

We also employ web beacons to help us better manage content in the Service by informing us what content is effective. Web beacons are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of internet users. Unlike cookies, which are stored on a user's computer hard drive, web beacons are embedded invisibly on websites. We tie the information gathered by web beacons to personal information we otherwise collect, and use them in our HTML-based emails to learn which emails have been opened by recipients. This allows us to gauge the effectiveness of our marketing campaigns as well as to operate and improve the Service. You can opt-out of these emails by following the unsubscribe instructions within such marketing emails.

Other Information Sharing

In addition to the purposes described above, we disclose personal information to respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims. We may also share such information if we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Terms of Service, or as otherwise required by law.

Links to Other Websites

The Service contains links to other websites and web applications that are not owned or controlled by ANCILE. Please be aware that we do not determine and we are not responsible for the privacy practices or content of such other sites. We encourage you to be aware when you leave the Service, and read the privacy statements of other websites and web applications linked to the Service. This Policy applies only to information collected by the Service.

Protection of Information

ANCILE is committed to ensuring the security of your personal information. We utilize robust precautions to protect the confidentiality and security of the personal information within the Service, by employing technological, physical and administrative security safeguards, such as firewalls and carefully-developed

security procedures. For example, when you enter sensitive information (such as login credentials and all your activity on our Services) we encrypt the transmission of that information using secure socket layer technology (SSL). These technologies, procedures and other measures are used in an effort to ensure that your data is safe, secure, and only available to you and to those you authorized to access your data. However, no internet, e-mail or other electronic transmission is ever fully secure or error free, so you should take care in deciding what information you send to us in this way.

Privacy Shield Data Privacy Notice

ANCILE complies with the EU-US Privacy Shield Framework for protecting the privacy of data flowing from the European Union ("EU") to the United States, as set forth by the US Department of Commerce.

We frequently enter agreements with our EU customers to provide them access to our Service, which includes the processing of information relating their customers or employees. In providing our Service, we do not own, control or direct the use of the information stored or processed on our platform at the direction of our customers, and in fact we are largely unaware of what information is being stored on our platform and only access such information as authorized by our customers or as required by law. Only you or your employees are entitled to access, retrieve and direct the use of such information. As such, we are only the "data processors" and not the "data controllers" of the information on our platform for purposes of the EU Directive on Data Protection (Directive 95/46/EC) and any subsequent regulations hereinafter enacted and required, such as the General Data Protection Regulation (Regulation (EU) 2016/679) and the Swiss Federal Act on Data Protection (collectively, the "Regulations"). Our EU customers, who control their customer data and send it to ANCILE for processing, are the "controllers" of that data and are responsible for compliance with the Regulations. In particular, ANCILE's customers are responsible for complying with the Regulations and any other relevant data protection legislation in the particular EU member state before sending personal information to ANCILE for processing. We work with our customers to help them provide notice to their customers concerning the purpose for which personal information is collected.

As the processors of personal information on behalf of our customers, we follow their instructions with respect to the

information they control. In doing so, we implement appropriate technical, physical and administrative measures against unauthorized processing of such information and against loss, destruction of, or damage to, personal information.

In compliance with the EU-US Privacy Shield Principles, ANCILE commits to resolve complaints about your privacy and our collection or use of your personal information. European Union citizens with inquiries or complaints regarding this privacy policy should first contact the dedicated ANCILE compliance team at legal@ancile.com.

ANCILE has further committed to refer unresolved privacy complaints under the EU-US Privacy Shield Principles to ANCILE's independent recourse mechanism, JAMS. If you do not receive timely acknowledgement of your complaint, or if your complaint is not satisfactorily addressed, please visit the JAMS website at <http://www.jamsadr.com/eu-us-privacy-shield> for more information and to file a complaint.

If you do not find the proposed solution satisfactory, ANCILE will resolve the dispute under dispute resolution procedures of the panel established by the EU data protection authorities (DPAs) to resolve disputes pursuant to the Privacy Shield Principles. The EU DPAs may be contacted directly via the information provided at http://ec.europa.eu/justice/data-protection/bodies/index_en.htm.

Under certain and limited conditions, you may have the possibility to invoke last resort binding arbitration by a "Privacy Shield Panel" composed of at least 20 arbitrators designated by the U.S. Department of Commerce and the European Commission.

ANCILE may be required to disclose an individual's personal information in response to a lawful request by public authorities, including meeting national security or law enforcement requirements.

ANCILE is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

In cases of onward transfer to third parties of data of EU individuals received pursuant to the EU-US Privacy Shield, ANCILE is potentially liable.

ANCILE will continue to adhere to the Privacy Shield Principles

for as long as it retains your personal information.

Choice

We process and store information on behalf of our customers. If you are an individual interacting with a customer of the Service and would no longer like to be contacted by that customer, please contact that customer directly. If you are an ANCILE customer and would like to opt-out of getting communications from ANCILE please contact us at legal@ancile.com or follow the unsubscribe instructions included in each marketing email. Requests to opt-out of transfers to our third-party vendors will also be considered, but limitations on data sharing may make it difficult or impossible to provide the Service in this manner.

Correcting and Updating Your Information

Customers may update or change the personal information they have provided ANCILE by logging into the Service and providing such additional information where applicable. If you are our customer and would like to gain access to, or request deletion of information we have collected as "data controllers," please contact us at legal@ancile.com. We will respond to such queries within 30 business days.

ANCILE may not have a direct relationship with the individuals with whom our customers may interact using the Service. Any such individual seeking access to, or who would like to correct, amend, or delete data which may be stored in the Service should direct his or her query to the applicable ANCILE customer acting as the "data controller" for such information. At the request of our customers, we remove any data placed in their accounts within 30 business days.

Data Retention

ANCILE will retain personal information we process on behalf of our customers for as long as needed to provide Service to our customers, subject to our compliance with this Policy. We may further retain and use this personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Children's Personal Information

ANCILE does not knowingly collect any personal information from children under the age of 13.

Changes to the Privacy Policy

If we make any material changes to this Policy, we will notify you by posting a prominent notice on the ANCILE Websites

ANCILE

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prior to the change becoming effective. We encourage you to periodically review our web page for the latest information on our privacy practices. Your continued use of the Service constitutes your agreement to be bound by such changes to this Policy. Your only remedy, if you do not accept the terms of this Policy, is to discontinue use of the Service.

Business Transactions

ANCILE may assign or transfer this Policy, and your user account and related information and data, including any personal information, to any person or entity that acquires all or substantially all of the business, stock or assets of, or is merged with. ANCILE.

Contact Us

If you have questions regarding this Policy or about the privacy practices of ANCILE, please contact us by email at legal@ancile.com, or at:

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