



Alogent Privacy Statement

Alogent is committed to maintaining the privacy and security of personal information submitted by visitors of Alogent's websites and mobile applications. This Alogent Online Privacy statement ("Statement") explains how Alogent's online services collect, use, and share information.

Collection and Use of Personal Information

Personal Information we collect online

Personal Information means personally identifiable information such as name, postal or email addresses, telephone, fax or mobile numbers. We will explicitly ask you when we need information that personally identifies you or allows us to contact you ("Personal Data"). Personal Data may include, but is not limited to the following categories:

- First and last name
- Title
- Position
- Employer
- Contact Information (company, email, phone, physical business address)
- ID data
- Connection data
- Localization data

Generally, Personal Data is requested when you register for a newsletter, when you request a particular service or information from us, when you purchase a product, or when you fill out a survey. The extent of the Personal Data to which you submit is determined and controlled by you at your sole discretion. Additionally, when possible, we will give you a chance to make sure that your Personal Data is correct and up to date.



How we collect

Online forms: Information you provide while completing the forms on Alogent's websites may be collected and stored.

Cookies and Browser Information:

- a) **Cookies:** Cookies are pieces of information stored directly on the device you are using. Cookies we use do not contain or capture unencrypted Personal Data. Cookies allow us to collect information such as browser type, time spent on the Site, pages visited, and your relationship with us. We use the information for security purposes, to facilitate navigation, to display information more effectively, to personalize/tailor your experience while engaging with us, and to recognize your device to allow your use of our online products and services.
- b) **Tracking:** We do not respond to Web browser's "Do Not Track" (DNT) signals or other mechanisms that enable individuals to exercise choice regarding the collection of such information

Social Media: Alogent provides information about our products, services, and community involvement on social media sites like Facebook, LinkedIn and Twitter. Please keep in mind that any information you share on these social media sites is visible to all users. You should never post any sensitive personal information (such as account number or social security number) on these sites. Please carefully review the Terms of Use and Privacy Policy on these sites, as they may be different from our own policies.

Trade Shows and Conferences: Alogent's teams may collect prospective client data when they meet during Trade shows or conferences and may use that information for sending marketing emails, postal mail, or telephone calls.



How we use Personal Data

We may use personal data:

- to respond to your inquiries and fulfill your requests;
- to inform you about important information regarding the Site, products or services for which you apply or may be interested in applying for, or in which you are already enrolled, changes to terms, conditions, and policies and/or other administrative information;
- to deliver marketing communications that we believe may be of interest to you, including, ads or offers tailored to you;
- to send email newsletters and commercial messages to readers who have voluntarily opted to receive the products and provided their email address. Each email we send includes an "opt-out" link readers can use to remove themselves from the distribution list

We have important business relationships with certain third-party service partners ("Service Partners"). These Service Partners allow us to offer you a broader array of services than we could provide on our own and assist us in the operation of our site. We and our Service Partners use your Personal Data to operate the site and services that we offer, and to inform you of new features, services, and products available to you. Alogent is not responsible for the privacy policies of websites to which it may link.

We will only retain your data for as long as is necessary and in accordance with applicable law.

We will inform you if we develop or acquire additional information about you from any other sources other than the ones specified here.

If the Personal Data is to be used for a new purpose that is different from that for which the Personal Data was originally collected or subsequently authorized, or is to be disclosed to a third party, we will obtain the Individual's explicit consent prior to such use or disclosure.



Data Subjects have the right to deny or withdraw their consent to collect or use their data. However, they may not be able to receive any information about our products and services or receive any promotions if they withdraw their consent.

How we share Personal Data

Alogent may disclose Personal Information about you to its group / affiliated companies, third party service providers and partners who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Site), or who otherwise process Personal Information for purposes that are described in this Privacy Policy or notified to you when we collect Personal Information about you. Parties with whom we may share Personal Information are bound to contracts requiring them to use and disclose Personal Information only for the permitted purposes set forth in the contract and to use reasonable security measures to protect Personal Information from unauthorized access and use.

Alogent may also disclose Personal Information about you to an actual or potential buyer (and its agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use Personal Information only for the purposes disclosed in this Privacy Policy.

Alogent may also use and disclose Personal Information to comply with laws, regulations, court orders and lawful instructions from government agencies, where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person.

Data Integrity and Security

Alogent uses reasonable efforts to maintain the accuracy and integrity of Personal Data and to update it as appropriate. Alogent has implemented physical and technical safeguards to protect Personal Data from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Alogent also employs access restrictions, limiting the scope of employees who have access to Personal Data.



Children's Privacy

Alogent does not knowingly collect, maintain, or use Personal Data from children under 13 years of age, and no portion of this website directly solicits children under the age of 13 and we request that these individuals do not provide Personal Data through the Site. If you learn that your child has provided us with Personal Data without your consent, you may alert us at privacy@alogent.com. We will take steps to delete it if we learn we have collected it.

Terms for Disclosing Personal Data

We may disclose Personal Data if required to do so by law or in the good-faith belief that such action is necessary to (a) conform to the edicts of the law or comply with legal process served on us or our affiliates; (b) protect and defend our rights or property, or those of our users; or (c) act as immediately necessary in order to protect the personal safety of our users or the public.

European Personal Data

Legal Bases for Processing

Alogent does not have a direct relationship with customers and other data subjects of Alogent's clients. However, from time to time, their personal data is provided to Alogent for assistance with software installation or software support with our banking clients. Therefore, clients must comply with all applicable legal requirements when providing personal data to Alogent or in allowing the collection and processing of personal data through the customer's use of the Products and Services, including, without limitation, if applicable, the obligation to obtain consent from their customers and other data subjects prior to using the Alogent Products and Services to collect personal information from such individuals.

We do not share any of the confidential commercial data, including European Personal Data, with any third party or provide access to any third party.

When confidential commercial information, including European Personal Data, is received by Alogent, the data is an electronic copy of the original data set. We do not maintain or update the content of the data received. Alogent temporarily uses this data in a controlled environment for supporting our banking clients and/or performing software updates. The data is not used by Alogent to make any decisions upon an individual such



as credit, finance, accounting, or benefits, nor is this data used to perform any type of transaction processing. Therefore, any data access or modifications should be requested through the original party and data controller who collected and maintains the original and active copy of the data.

Whenever Alogent receives European Personal Data from one of its clients, it is used only as per the instructions of the customer.

Alogent's teams may collect prospective client data when they meet during Trade shows or conferences and may use that information for sending marketing emails, postal mails or telephone calls. However, the data subjects have the rights to unsubscribe from marketing email communications by clicking on the "preferences" or "unsubscribe" link at the bottom of our emails to either customize your subscriptions or remove yourself entirely or by requesting an opt-out by sending an email to privacy@alogent.com.

Data Subject Rights

Individuals may have one or more of the following additional rights regarding their personal data if their data is collected by or on behalf of an Alogent Client, depending on such client's policies and agreements with Alogent:

Access: To request a copy of the personal data we have collected about such individual.

Rectification & Erasure: To request that we rectify or delete any of the personal data about such individual that is incomplete, incorrect, unnecessary or outdated.

Objection: To object, at any time, to personal data being processed for direct marketing purposes.

Restriction of processing: To request restriction of processing of personal data about such individual for certain reasons, such as, for example, if such individual considers personal data collected by us to be inaccurate or has objected to the



processing and the existence of legitimate grounds for processing is still under consideration.

Data Portability: To request and receive the personal data we have collected about such individual in a commonly used and machine-readable form.

Right to Withdraw Consent: To unsubscribe from marketing email communications by clicking on the “preferences” or “unsubscribe” link at the bottom of our emails to either customize your subscriptions or remove yourself entirely.

Alogent will endeavor to respond in a timely manner to all reasonable written requests to exercise any of the rights listed above. Such requests must be made by contacting us at privacy@alogent.com, and including sufficient details so that we are able to understand the request and respond. If the request relates to data collected by or on behalf of an Alogent client, we will first refer the individual to such client and our ability to take any action requested is subject to our underlying agreement with such client and applicable laws.

EU-U.S. Privacy Shield Framework

Alogent complies with the EU - U.S. Privacy Shield Framework as set forth by the US Department of Commerce (the "Framework") in regards to the collection, use, and retention of European Personal Data. Alogent has self-certified that it adheres to the Framework Principles of notice, choice, and accountability for onward transfer, security, data integrity and purpose limitation, access, and enforcement. To learn more about the Framework and view our certification, please visit www.privacyshield.gov/list. While Alogent does not directly collect or maintain European Personal Data, Alogent is committed to protecting any European Personal Data according to the Principles of the Privacy Shield Framework. As such, if there is any conflict between this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall supersede the Alogent privacy policy.



In compliance with the Privacy Shield Principles, Alogent commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Alogent at privacy@alogent.com. Alogent has further committed to refer unresolved Privacy Shield complaints to International Centre for Dispute Resolution/American Arbitration Association, an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please visit <http://go.adr.org/privacyshield.html> for more information or to file a complaint. The services of American Arbitration Association are provided at no cost to you.

We are also subject to the investigatory and enforcement powers of the Federal Trade Commission with respect to the Framework. We may be required to disclose European Personal Data in response to lawful requests by public authorities, including meeting national security or law enforcement requirements.

For individuals residing in a EU member country, there are certain conditions, fully described on the Privacy Shield website (<https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint>), under which you may invoke binding arbitration when other dispute resolution procedures have been exhausted for unresolved privacy or data use disputes.

Information for California Residents

We are required by the California Consumer Privacy Act of 2018 (“CCPA”) to provide to California residents an explanation of how we collect, use and share their personal Information, and of the rights and choices we offer California residents regarding our handling of the personal information.

Your California privacy rights

As a California resident, you have the rights listed below. However, these rights are not absolute, and we may decline your request as permitted by the CCPA.

- **Information.** You can request the following information about how we have collected and used your Personal Information during the past 12 months:



- The categories of Personal Information that we have collected.
 - The categories of sources from which we collected Personal Information.
 - The business or commercial purpose for collecting and/or selling Personal Information.
 - The categories of third parties with whom we share Personal Information.
 - Whether we have disclosed your Personal Information for a business purpose, and if so, the categories of Personal Information received by each category of recipient.
 - Whether we have sold your Personal Information; and, if so, the categories of Personal Information received by each category of recipient.
- **Access.** You can request a copy of the Personal Information that we maintain about you.
 - **Deletion.** You can ask us to delete the Personal Information that we maintain about you.
 - **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination. This means that we will not penalize you for exercising your rights by taking actions such as by denying you goods or services, increasing the price/rate of goods or services, decreasing the service quality, or suggesting that we may penalize you as described above for exercising your rights. However, the CCPA allows us to charge you a different price or provide a different service quality if that difference is reasonably related to the value of the Personal Information we are unable to use.

How to exercise your rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by contacting us at privacy@alogent.com.

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:



- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Sale of Personal Information

We do not sell your Personal Information to third parties as defined in the CCPA.

Personal information that we collect, use and share

The personal information we collect, use and the sources from which they are obtained during the last 12 months are explained in the section “**Collection and Use of Personal Information**”, at the beginning of this policy.

Reporting Violations

If at any time you believe that we have violated these policies, please notify us by email at privacy@alogent.com and we will use all commercially reasonable efforts to promptly investigate and remedy the problem.

Contact Alogent

Attn: Compliance

35 Technology Parkway South, Suite 200

Peachtree Corners, GA 30092

privacy@alogent.com

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