

Privacy Policy for Conversionista and partners to CJAM Sessions 2021 - 2022

Conversionista

Kameleoon

Optimizley

AB Tasty

Conversionista: Privacy and cookie policy

Conversionista AB respects your privacy and the right to control your personal data. Our guiding principles are simple. We will be open to inform you about what data we collect and why. We will protect your data as if it were our biggest trade secret.

This policy also covers our sister company Curamando AB. Your personal data may be transferred between our sister companies "Conversionista AB" and "Curamando AB" for marketing, analysis and development of Conversionista's services and activities.

Conversionista AB ("Company") Privacy Policy describes what data we collect, the purpose of the processing, how you can control your own data and how to contact us. This Privacy Policy applies when you use apps, web pages, and services that are included in an app or on a website managed by the Company. The Conversionista AB is a personally responsible person in accordance with these terms and is responsible for processing according to current legislation.

Here is a summary of what you can expect by visiting our website:

- We track your web activity for marketing purposes
- We collect personal information for marketing purposes and communication.
- We process personal information by sending them to integrated Email and CRM systems for marketing and nurturing purposes.
- We save personal information in our systems for analysis purposes.
- Your behavior and web activity can be used for marketing purposes such as profiling, and marketing analysis.

What personal data do we collect?

Conversionista AB collects the information primarily from you as a customer. Examples of personal data that we might collect are your name and other contact details such as phone number, email address or physical address. Conversionista AB may update your information from other public records if it is necessary in order to maintain good registry care.

Conversionista AB registers personal data in connection with:

1. a) Notification of a service offered through the various platforms offered by the Company.
2. b) When you enter your e-mail address or your mobile phone number on the website.
3. d) If you contact us via email, by phone, our websites and social media.
4. e) If you sign up for email subscriptions.
5. f) Your visit to our websites and app, including but not limited to traffic data, location data, weblogs and other communications data, such as the IP address, type of device, operating system and browser type used for the visit.

Collection with consent

By filling out a consent form on the website (for example subscribe to newsletter, receive promotions and offers etc.) you agree that your personal information (for example name, telephone, email) may be used for marketing purposes for the services you are exposed to where you are asked to fill in your personal information. We also collect your IP address, geographic position, and interests in order to better adapt our marketing to you.

By browsing our website you also agree to that we may add cookies, both a so-called third-party and first-party cookies, on your computer from. These cookies will follow you and your online behavior in order to offer you marketing based on your online behavior.

How we use collected information

The Company processes personal data mainly for the purposes stated below and for any additional purposes stated at the time of collection:

1. To fulfill orders for services through one of the platforms offered by the Company;
2. Enable good customer service, like managing your requests, correcting incorrect information or sending information you requested e.g. newsletter;
3. Information on ordering a service is stored and analyzed, as well as the basis for offers and discounts as well as promotion of both general and targeted nature;
4. In order to manage customer profiles, conduct analyses and market research;
5. For system administration and for obtaining statistical data about the behavior and patterns of our users, this does not identify any individual but occurs at aggregated level;
6. To develop, deliver and improve our products and services through analysis of your behavior on our websites and app.
7. Personal data is also used for analysis to perform segmentation/profiling, in order to develop targeted offers and services
8. To send you information and promotion via SMS, email, app, push or other digital contact routes such as social media since you have an active customer relationship with us;
9. To contact you via app, SMS, email or post about other offers, promotions or services that we believe may be of interest to you, please note that you may decline this promotion at any time;
10. To provide you with relevant recommendations, offers, and custom services based on what other people with similar behaviors have been interested in, what you have chosen for service, looked at and shown interest in;
11. To help us develop our site and app to be more useful and to enhance your user experience of the platforms offered through the Company by customizing the display of the services to the device being used;
12. To send important messages as communication about changes in our terms and policies;

Information that may be disclosed

We can share information with other companies that process data on our behalf in order to perform our services, i.e. analysis, distribution or other services to maintain and apply our terms of use and delivery terms. However, all handling of personal data always ensures high security and confidentiality.

The Company only collaborates with partners handling personal data within the EU/EEA or with companies that maintain the same level of protection as in the EU/EEA by, for example, have joined the so-called Privacy Shield Agreement between the EU and the United States.

About cookies

When you use our site and app, personal data may be collected via e.g. cookies. This is only done through a separate consent. This will store the information about your use and the pages that are visited. This could be technical information about your device and Internet connection such as operating system, browser version, IP address, cookies, and unique identifiers. When visiting our websites where our services are provided, different techniques can be used to recognize you in order to learn more about our users. This can be done directly or through the use of third-party technology.

Legal basis, storage, and disclosure of personal data

By submitting data to the Company, you provide your permission for the Company to register and store information about which service purchased and processing the specified personal data for the specified purposes. As a legal basis for treatment, the Company will refer to the fulfillment of agreements, legitimate interest or consent. If the Company uses legitimate interest as a basis, it will only be done for the purposes stated above. Please note that you can at any time withdraw your consent by contacting us, for contact details, see the heading How to contact us.

The treatment is in accordance with current legislation and means that personal data are not retained for a longer period than necessary for the purpose of the treatment. The Company will store your personal data as long as you are a customer with us. For marketing purposes, information older than 3 years is not used. This implies that data will be erased when they are no longer relevant or necessary for analysis or direct marketing for the purposes for which they have been collected. Some information may be retained longer when required due to other legal requirements. However, all handling of personal data always ensures high security and confidentiality.

Your rights and choices

You have rights regarding your personal data and you are able to influence your information and what is saved. The Company will, on its own or the customer's initiative, rectify data that is found to be incorrect. You can also at any time request that your data be deleted or that its use is limited by contacting us (for contact routes see the heading "How to contact us"). If you believe that we do not respect your rights, please contact the Company or you can contact the Data Protection Authority in your country, please find the right one at

http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm

You can at any time refrain from receiving marketing communications from us by updating your account settings on My Pages by clicking "unsubscribe" in the email and SMS communications that we send you. You are always welcome to contact our customer service to help you decline our communications.

You can, once a year, receive information about the personal data registered in a written form from Conversionista AB.

Links to other sites

In the event that our site contains links to third party websites, websites, or materials published by third parties, these links are for information purposes only. Because the Company has no control over the content of these websites or its materials, we are not responsible for its content. The Company is also not responsible for any damages or losses that might arise from the use of these links.

How to contact us

For further information about personal data management or if you have any questions, feel free to contact us at:

This privacy policy applies from

Conversionista AB

Regeringsgatan 30, 111 53, Stockholm.

tel: 08-128 769 10

email: hej@conversionista.se

Org.nr. 556845-0075

This privacy policy applies from 2020-11-05 10:30:05

Kameleoon: Privacy Policy

1. Preamble and scope

Kameleoon is committed to protecting your privacy. This privacy policy covers Kameleoon's practices in terms of data collection, processing and use. It also details your options for consulting, using and modifying your personal data. If you disagree with these practices, you must abstain from using our website.

This privacy policy is updated regularly. Kameleoon will publish any change in the privacy policy on this page, and send you a more personal notification by e-mail when the changes are significant.

In any event, Kameleoon encourages you to check this privacy policy on a regular basis.

If you have questions about this privacy policy or the processing of the information you provide, please send an e-mail to legal@kameleoon.com or a letter to Kameleoon, 12, rue de la Chaussée d'Antin 75009 Paris addressed to the Privacy Department.

2. Data Controller

The processing of the personal data of users registered on Kameleoon websites is subject to French law, in particular the amended Law n° 78-17 dated 6 January 1978 pertaining to information technology, databases and civil liberties, (known as the Information Technology and Civil Liberties Law). The "Data Controller" for the personal data of Kameleoon website users, as defined by said Law, is Jean-René Boidron.

We undertake, in the performance of our business activities, to respect the provisions of said Law, and to undertake fair, honest and transparent processing of your personal data. Namely, this includes the processing of data for specific, explicit and legitimate purposes, without further processing the data in any way that is incompatible with those purposes, for a period that does not exceed the time required for the purposes for which they are collected and processed.

Finally, we inform you that the processing of personal data of Kameleoon website users has been duly declared to the Commission Nationale Informatique et Libertés (the French Data Protection Authority, known as CNIL) under the number GCA1368568E.

To contact our Data Protection Officer : dataprotection@kameleoon.com

3. Categories of personal data collected and processed

- Personal data that you communicate to Kameleoon

We collect personal data from Internet users wishing to: download a resource, request a demo, receive our news, sign up for an event or apply for an advertised position.

Personal data

Personal data means all the information that you willingly communicate to Kameleoon and that identifies you personally, including details such as your name, your e-mail address, the name of your company, its address, your telephone number and any other information about you or your company.

Personal data also includes information pertaining to your browsing when this information enables a person to be directly or indirectly identified. Browsing information means information about your computer and your visits to this website, in particular, your IP address, your geographical location, the type of browser, the reference sources, the length of the visit and the pages viewed. Besides this information, Kameleoon does not collect any other sensitive information about you.

Log files

When you use the services or consult the content made available by Kameleoon, certain information concerning your computing hardware and software is also automatically collected. This information may include: your IP address, type of browser, domain names, Internet service provider, (ISP), files viewed on our website (for example, HTML pages, images, etc.), operating system, click path data, times of access and addresses of originating websites. This information is used by Kameleoon to ensure the running of the subscription service, maintain the quality of the subscription service and obtain general statistics on the use of the Kameleoon website. For these purposes, this data collected automatically is associated with personal information such as name, e-mail address and telephone number.

- Cookies

The cookies used on our website enable us to identify the pages a user visits, the resources he or she downloads and more generally their on-site visiting behavior.

WHAT IS THE PURPOSE OF OUR COOKIES?

The cookies used on our website enable us to identify the pages a user visits, the resources he or she downloads and more generally their on-site visiting behavior.

1° Optimizing the user experience on our site

- by offering personalized content and highlighting resources on Kameleoon.com,

- by adapting Kameleoon's interface to the device you are using (language, resolution, OS, etc),
- by memorizing information contained in forms you filled out on our site or via partner technologies* (sign-in to a real-life or virtual event, download of a resource, demo request, access to your Kameleoon account).

* Google Form, Hubspot.

2° Improving our website

Cookies help collect statistical data regarding site frequentation and content consumption and enable us to offer an experience adapted to your needs and interests.

3° Measuring our audiences

We are using Google Analytics to measure our Kameleoon's site's audiences.

4° Offering targeted ads via Adroll.

According to content consumed by the visitor on Kameleoon.com, cookies enable us to offer targeted ads regarding our content and services via the Adroll retargeting service.

- THIRD-PARTY COOKIES

Third-party cookies are deposited by other companies such as partners while you are surfing on our site or sharing personal data on our site using external services.

We are particularly vigilant as to the observance by partner websites of national data protection regulations and GDPR compliance. We request that they take all appropriate measures regarding security and confidentiality of personal data.

Please find below the purpose of the cookies we are aware of and the means at your disposal to change cookie setup.

Third-party apps integrated into our website

We are using third-party apps on our website in order to:

- to share our site's content with others (social sharing buttons): The corresponding social networks may be able to identify you via this button, even if you don't use it while browsing our site or app. If you opened a session on one of the networks on the device you use to visit our website before arriving on our site, the network is able to track your navigation on our site. We have no control over the collection of data by the social network regarding your navigation on our site and do not have access to personal data in their possession. However, you can access the confidentiality policy of the social network to learn more about the subject and regulate the information you agree or refuse to share.
- to collect your personal data (name, first name, email): We have no control over the quality of data management by Hubspot, Google.

Web tags and other technologies

We use web tags to track your navigation on our site and in our emails (via our marketing automation solution). Web tags are code lines that recognize given types of information on your computer, such as cookies, time and date of a page visit, or description of the page where the tag is located.

We use this type of tags to improve the navigation experience on our site and to understand if a user reads and clicks our emails, with the aim of offering Kameleoon users content consistent with their expectations.

Mobile devices

Certain mobile devices send information regarding the model of the phone the OS version, the connectivity, the name and version of used apps or the geographical location at the time of the connection.

This data is automatically processed by Kameleoon's and some of Kameleoon's partners' servers (Hubspot, Google Analytics). This enables us to offer relevant experiences, in line with the technical characteristics of your device.

- Accept or refuse cookies

You can choose not to receive cookies from our website at any time.

You can decide to block cookies we may deposit in your browser, either case by case or by refusing them systematically once and for all.

Note that if you refuse our cookies, we cannot guarantee an optimized browsing experience.

For an efficient cookie management meeting your requirements please use your browser's setup options, taking into account the cookies' purpose (as mentioned above).

You can also delete cookies already stored in your browser. For instance, to delete cookies deposited by Kameleoon:

- Google Chrome

Open the browser's "Settings" tab. Click on "Advanced" followed by "Privacy and security", "Content settings", then "cookies" and "See all cookies and site data". Search "Kameleoon", tick the boxes and delete.

- Firefox

Open the browser's "Options" tab and select "Privacy and Security". In the "History" section, click on "remove individual cookies". Search files containing the name "Kameleoon", select and delete them.

- Microsoft Edge

Click on the "Other action", then on "Settings" ». Click on "Choose data to delete". Check the box "Cookies data from registered websites", search files containing "Kameleoon", select and delete them.

- Safari

Open, the browser's "Preferences" tab and open the tab "Confidentiality". Click on "Manage website data", search files containing "Kameleoon" select and delete them. Click on "Done".

4. Conditions of use for personal data

- Purpose of collecting and processing your personal data

Users' personal data is collected and processed for set and specific purposes, such as: (i) supplying and managing our services; (ii) managing the processing of your recruitment applications and your product orders; (iii) communicating with users and improving the quality of our services, namely answering your questions and keeping you informed about our news; (iv) preventing online fraud; and (v) resolving any possible disputes or problems arising from the use of our services.

Any use of personal data for a purpose other than those set out above in our Privacy Rules will require your express prior consent.

- Length of time your personal data is stored

We undertake to keep your personal data for only the length of time required to process it for above-stated purposes, and in any event for the time limits imposed by the law. Moreover, the personal data may be kept for several days or several years, depending on its type.

In any event, we undertake to delete your personal data from our databases at the end of these different lengths of time.

However, we may keep certain information for a period subsequent to the closing of your personal account so as to fulfil our legal, accounting and tax obligations and, in particular, so as to prevent potential illicit behavior following the deletion of your personal account (reuse of your former account by a third party). Under these circumstances, your data will be deactivated and will no longer be accessible online.

5. Sharing information with third parties

- Absence of communication to third parties

We undertake not to disclose to third parties the personal information and data that you communicate to us. This personal information and data is used exclusively by our internal departments and will on no account be passed on or sold to third parties without your express prior consent.

- Communication for judicial or legal reasons

Your personal information and data could be disclosed to a third party if Kameleoon is compelled to do so by the law, a regulatory provision, or a court order, or if this disclosure is made necessary by the requirements of an investigation, injunction or judicial procedure, in France or abroad.

Likewise, we may need to share your personal information and data with companies or third persons so as to:

Enforce the current privacy policy and general terms and conditions of sale of the Kameleoon website, or to determine possible breaches of these;

Guard against any violation of rights, goods or the safety of the company Kameleoon and its users, in accordance with the law.

6. Personal data safety

We implement all the safety measures necessary to protect the personal data in our possession against any unauthorized access, disclosure, modification, damage or destruction.

To this end, Kameleoon and its technical and hosting service providers have deployed the appropriate measures to ensure the integrity, privacy and safety of your personal data.

Finally, we inform you that your personal data is stored on servers located within the European Union.

7. Respecting website user rights

You have the right to access (for example, to check the data we are storing about you), rectify (update or correct your data), or delete (for example, closing your personal account) your personal data, as well as the right to object to the collection and processing of all or part of this data for commercial prospecting, including profiling where this is linked to such prospecting.

In addition, it should be stipulated that these rights give you the possibility of modifying your notification preferences at any time, by accepting or objecting to the use of your personal data in our marketing or promotional activities. You may exercise these rights at any time through a choice of two methods:

by letter to the address mentioned in Section 1 above;

or by e-mail to: legal@kameleoon.com

If you exercise these rights, we will make every effort to address your requests as soon as possible.

Update, 30th of October 2019

Optimizley: Privacy policy

This is the privacy policy of the Optimizley group of companies (Optimizley, we, our or us) which comprises Episerver AB, Optimizely Inc., Episerver Inc., Episerver GmbH, Zaius, Inc. and our other subsidiaries and associated companies from time to time.

Optimizley takes your privacy seriously and is committed to protecting your privacy rights. We want you to know why we collect your personal information, what we collect, how we use it, and for how long we store it. We also want you to know how you can access, amend, correct, and in some cases delete your personal information.

This privacy policy explains the information we collect through the Optimizley websites, including www.optimizely.com and world.optimizely.com as well as through other Optimizley managed websites or pages where this privacy policy is posted or linked (our Websites). This privacy policy also describes the personal information collected from or on behalf of end users of our services and software-as-a-service products (our Products and Services).

The Appendix to this privacy policy contains specific provisions that supplement this privacy policy to meet the requirements of specific data protection and privacy laws where they apply.

What personal information we collect

In general terms, personal data, personal information or personally identifiable information are terms used to mean any information about an individual from which that person can be identified. Throughout this privacy policy, we refer to this kind of information as personal information. Where the identity of a person has been removed (by anonymization), then this is not personal information. We call this anonymized information.

We collect both personal information and anonymized information. We may use both personal information and anonymized information to create aggregated information such as statistical or demographic data, which we may use for any purpose.

In general terms, the types of personal information we collect include:

- General Information: first name and surname, username and password, email address, contact information, country of residence, job title, physical address and other information you provide us when you create an account or interact with us.
- Transaction and Payment Information: information that may relate to transactions you may carry out with us, including bank account details and other relevant payment information.
- Identity Information: information that we may require to establish your identity. This may include your title, first name and surname, preferred name, photographic images, residential address and any additional names.
- Usage Information: information about how you use our Websites and our Products and Services including viewing, logs, metrics and other device and technical data and support tickets. This may include information such as your web request, Internet Protocol ("IP") address, device identifiers, device information (such as OS type or browser type), cookie IDs, referring / exit pages and URLs, interaction information (such as clickstream data), domain names, pages viewed, crash data, and other similar technical data.

- Location Information: location information either provided by a mobile device interacting with one of our Websites or applications or associated with your IP address when you visit our Websites or use our Products and Services.
- Public/Third Party Information: information from third party or public sources or that we receive from companies that partner with us to provide our Products and Services.
- User Generated Information: content and information that you submit when using the Websites or our Products and Services, including, for example, information you provide in any blogs or forums on the Websites, comments you add on our Products and Services, information you provide when you participate in any interactive features or surveys, and information you submit when filing a support ticket.
- Consents and Preferences Information: details of permissions consents and preferences that you give us.

Where we need to collect personal information by law, or under the terms of a contract we have with you, and you fail to provide that personal information when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with Products and Services). In this case, we may have to cancel the Products and Services you have with us, but we will notify you if this is the case at the time.

Optimizely and our customers – our role as a processor

- Our Products and Services allow our customers to build websites, ecommerce sites, and manage marketing campaigns, and they may be used by them to collect personal information.
- We do not control the content of these webpages, emails or other messages, or the types of personal information that our customers may choose to collect or manage using our Products and Services.
- In these cases, it is our customers that control the processing of personal information, and we act on their behalf as a processor by collecting information under the direction of our customers and we have no direct relationship with those individuals whose personal information we process. The terms of our processing activities are regulated by a data protection agreement entered into between us and our customer. If you have a question about how your personal information is processed by one of our customers or have any other requests relating to that personal information, please contact the relevant customer as the owner of the website or sender of the communication.
- Personal information that is collected using our Products and Services on behalf of our customers belongs to them and is used, disclosed and protected by them according to their privacy policies and policies and is not subject to this privacy policy.

Why we collect personal information

The purposes for which we use personal information depend on the relationship we have with you.

Products and Services End-Users

Purpose	Type of personal information
<p>To provide you with information you ask for including:</p> <ul style="list-style-type: none"> ● Following up with you on the resolution of issues, including to provide support. ● Responding to your requests, questions and issues. 	<ul style="list-style-type: none"> ● General Information ● Identity Information ● Usage Information ● User-Generated Information
<p>To be able to process any order you place, to deliver our Products and Services including:</p> <ul style="list-style-type: none"> ● Sending you important operational information. ● Complying with our contractual obligations to you in relation to the Products and Services. ● Managing our relationship with you, which will include notifying you about changes to this privacy policy and the terms and conditions of our Websites. 	<ul style="list-style-type: none"> ● General Information ● Transactions and Payment Information ● Identity Information ● Consents and Preferences Information
<p>To process financial transactions including for our legal and regulatory reasons.</p>	<ul style="list-style-type: none"> ● General Information ● Transactions and Payment Information ● Identity Information

<p>To operate, maintain, analyze, develop, update and improve our Products and Services including determining how to improve them and also to analyze trends and gather Aggregated Information about our user base to better tailor our marketing efforts, including soliciting for reviews of our Products and Services, which may be administered through partners and/or third parties.</p>	<ul style="list-style-type: none"> ● Usage Information ● Location information ● Public / Third Party Information ● Consents and Preferences Information
<p>To prevent and detect crime, fraud and corruption.</p>	<ul style="list-style-type: none"> ● General Information ● Transaction and Payment Information ● Identity Information ● Usage Information ● Location Information ● Public/ Third Party Information ● User Generated Information ● Consents and Preferences Information

Website Users

Purpose	Type of personal information
<p>To provide you with information you may ask for.</p>	<ul style="list-style-type: none"> ● General Information ● Identity Information
<p>To allow you and us to publish any comments or any user generated content that you may post to our Websites (such as on Optimizely World).</p>	<ul style="list-style-type: none"> ● General Information ● Identity Information ● User Generated Information

<p>For our advertising partners to deliver interest-based advertising on our behalf.</p>	<ul style="list-style-type: none"> ● General Information ● User Generated Information ● Usage Information ● Consents and Preferences Information
<p>Personalizing your experience whilst visiting our Websites including:</p> <ul style="list-style-type: none"> ● Allowing us to understand the effectiveness of our Websites. ● Allowing us to better understand your needs. 	<ul style="list-style-type: none"> ● General information ● Usage Information ● Location Information ● User Generated Information ● Consents and Preferences Information
<p>To prevent spam and fraudulent input.</p>	<ul style="list-style-type: none"> ● General Information ● Identity Information ● Usage Information ● Location Information ● Usage Generated Information

Representatives of Corporate Customers and Partners or a Third Party Business

Purpose	Type of personal information
<p>To provide you with information you ask for including:</p> <ul style="list-style-type: none"> ● Following-up with you on the resolution of issues, including to provide support. ● Responding to your requests, questions and issues. 	<ul style="list-style-type: none"> ● General Information ● Identity Information ● Usage Information ● User Generated Information
<p>To follow-up on our marketing content to evaluate its effectiveness for marketing purposes including where you have requested information about a marketing asset.</p>	<ul style="list-style-type: none"> ● Usage Information ● Location information ● Public/ Third Party Information ● Consents and Preferences Information
<p>To be able to process any order you place, to deliver our Products and Services including:</p> <ul style="list-style-type: none"> ● Sending you important operational information. ● Complying with our contractual obligations to you in relation to the Products and Services. ● Managing our relationship with you, which will include notifying you about changes to this privacy policy and the terms and conditions of our Websites. ● Sending you information that is relevant to your use of the Products and Services. ● 	<ul style="list-style-type: none"> ● General Information ● Transactions and Payment Information ● Identity Information ● Consents and Preferences Information
<p>To enable you to resell and provide our Products and Services, which includes fulfilling our contractual obligations to you as a partner.</p>	<ul style="list-style-type: none"> ● General Information ● Transaction and Payment Information

<p>To verify your email address to prevent spam and misuse.</p>	<ul style="list-style-type: none"> ● General Information ● Transaction and Payment Information ● Identity Information ● Usage Information ● Location Information ● Public/ Third Party Information ● User Generated Information ● Consents and Preferences Information ●
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Event Participants

Purpose	Type of personal information
<p>When you register for an Optimizely event which includes managing and following up on the event.</p>	<ul style="list-style-type: none"> ● General Information ● Identity Information ● Consents and Preferences Information
<p>When you participate at an Optimizely event which includes:</p> <ul style="list-style-type: none"> ● For managing and following up on the event. ● Allowing you to subscribe to our newsletter or other marketing communications. ● To enter a competition or game. 	<ul style="list-style-type: none"> ● General Information ● Identity Information ● Consents and Preferences Information

Where we obtain personal information from

We use different methods to collect personal information from and about you including through:

- Direct interactions. You may give us your personal information by submitting information to us, filling in forms on our Websites or by corresponding with us by post, phone, email or otherwise. This includes when you:
 - apply for or enquire about our Products and Services – as a customer, potential customer or reseller;
 - create an account on our Websites;
 - request support for our Products and Services;

- subscribe to our publications;
 - request marketing to be sent to you;
 - register for an event;
 - participate at an event;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.
- Automated technologies or interactions. As you interact with our Websites and through your use of our Products and Services, we will automatically collect personal information relating to your equipment, browsing actions and patterns. For example, this includes when we collect the URLs of any pages viewed or links clicked on our Websites and connect them to your profile. We collect this personal information by using cookies, server logs and other similar technologies. Please see our Cookies Policy for further details.
 - Third parties or publicly available sources. We will receive personal information about you from various third parties and public sources as set out below:
 - analytics providers such as Google;
 - advertising networks;
 - search information providers;
 - providers of technical, payment and delivery services;
 - data brokers or aggregators; and
 - publicly available sources.

Data sharing

Data sharing within Optimizely

- We may share personal information within Optimizely to deliver Products and Services to our customers.
- Optimizely has employees and offices globally. This means that we may transfer information globally. Outside of the EU, we have offices in, for example, United States, Vietnam, Norway, Australia, and South Africa, but Optimizely employees or sub-processors may access the information from other countries, subject to any controls that may have been put in place to restrict access to personal information in the form of geofencing controls.

Data sharing with those who support our Products and Services

- In order to deliver our Products and Services, we rely on a number of different systems, platforms and services, some of which are provided by members of the Optimizely group of companies and some of which are provided by third party vendors and service providers. This covers everything from the software we use in our finance department to the infrastructure we use to run our Products and Services, including when you participate in a free trial. Where we use vendors and service providers, they act as processors on our behalf. These vendors are under a data processing agreement with us, act on our instructions and adhere to the policies described in this document.

- Third party vendors that we use in order to provide support for our services include:
 - Salesforce – <https://www.salesforce.com/>
 - Zendesk – <https://www.zendesk.com/>
 - Chartio (an Atlassian company) – <https://chartio.com/>
 - Heroku (a Salesforce company) – <https://www.heroku.com/>
 - Segment.io, Inc. – <https://segment.com/>
 - New Relic – <https://newrelic.com/>
 - Looker (a Google company) – <https://looker.com/>
 - Amplitude – <https://amplitude.com/>
 - Slack – <https://slack.com/>
 - Marketo – <https://www.marketo.com/>
 - Atlassian – <https://www.atlassian.com/>
 - Okta – <https://www.okta.com/>
 - Gainsight – <https://www.gainsight.com/>
 - Mailchimp – <https://mailchimp.com/>
 - Virtua – <https://virtua.tech/>
 - Aha, Inc. – <https://www.aha.io/>
 - Chargebee – <https://www.chargebee.com/>
 - LaunchDarkly – <https://launchdarkly.com/>
 - Intercom – <https://www.intercom.com/>
 - Fullstory – <https://www.fullstory.com/>
 - JIRA – <https://www.atlassian.com/software/jira>
 - Netsuite – <https://www.netsuite.com/>
 - OneTrust – <https://www.onetrust.com/>
 - 6sense – <https://6sense.com/>
 - Litmos – <https://www.litmos.com/>
 - Drift – <https://www.drift.com/>
 - G2 – <https://www.g2.com/>
 - Trust Radius – <https://www.trustradius.com/>

Data sharing with other third parties

- We never sell or rent your personal information to third parties.
- If you are an individual based in the EEA and have given us your express permission, we may share your personal information with select partners that you decide. If you are an individual not based in the EEA, we may share your personal information with select partners that are clearly labelled when you sign up. We always make clear when we share that information – as an example when we provide an event or an asset in collaboration with a partner of ours.

Protection of your personal information

- We take care to protect your personal information against abuse or loss. As an example, we store personal information in secure environments. We also provide training to our employees on data protection best practices and require them to enter into a confidentiality agreement.
- We cannot guarantee absolute security though. If you would like to learn more about what we do to protect your personal information, please contact us at privacy@optimizely.com.

- We hold our vendors and service providers to the same high privacy standards as we hold ourselves. In all cases where we share your personal information with anyone outside of Optimizely, we explicitly require them to acknowledge and adhere to our privacy and customer data handling policies through a data processing agreement.

Children's Privacy

- Protecting the privacy of young children is especially important. For that reason, Optimizely does not knowingly collect or solicit personal information from anyone under the age of 13. In the event that we learn that we have collected personal information from a child under age 13, we will delete the information we have stored as quickly as possible. If you believe that we might have any information from or about a child under 13, please contact us as indicated in the contact section below.

How long we keep personal information

Generally

- In general terms, we keep your personal information for as long as it is warranted to fulfil our commitments to you and to adhere to legal or regulatory requirements.
- If you are a customer, partner or someone else with whom we deal, we keep the personal information as a minimum for the duration of our relationship. Certain personal information may be kept for longer though, for example, to ensure that we have an accurate record of your dealings with us in the event of any complaints or challenges; or if we reasonably believe there is a prospect of litigation relating to your relationship with us.
- If you have requested to receive marketing communications, we will keep your personal information only for as long as you wish to receive those communications.

If you are an Optimizely customer or partner (or prospective customer or partner)

- If you are an Optimizely customer or partner, we may keep your personal information for the duration of our contract between your organization and us. If not required by law or regulation to keep your information beyond that term, we will remove it within 12 months of the contract ending.
- If you have signed or entered into a contract with us, we typically archive and store that contract for an extended period of time, typically seven years or longer, depending on jurisdiction. Other items such as invoices may also be kept for longer than 12 months.
- If you have been in touch with us with a question, demo request, asked for a quote, or have engaged with a sales representative, your information will be stored for up to 12 months after the last recorded activity, and will then be removed or anonymized.
- If you are a prospective Optimizely partner, we may keep your personal information for so long as you are active as a prospect or until you tell us you do not wish to become an Optimizely partner.
- If you have asked to receive one of our newsletters or other marketing communications from us, we will keep your personal information to maintain your subscription, even if you would no longer be a customer or partner of ours.
- If you have signed up to take part in our developer community or discussion forums, your personal information will be retained indefinitely unless you explicitly tell us to remove it.

If you are not an Optimizely customer or partner

- If you have opted into any of our content marketing initiatives or have opted into our newsletters, your personal information will be kept for as long as you seem to be an active subscriber.
- If we haven't seen any activity on your part for 12 months, we will remove your personal information or anonymize it.
- If you have signed up to take part in our developer community or discussion forums, your personal information will be retained indefinitely unless you explicitly tell us to remove it.

Your choices and rights

This section describes the rights you have under this privacy policy. You may have additional rights under applicable law - please see the Appendix for details.

How you can opt out of Optimizely marketing

- You can choose to opt out of marketing communications from us at any time.
- If you don't want to receive marketing communications from us, you can at any time use the "Unsubscribe" link present in all marketing emails from us or go to our unsubscribe page.
- Please note that opting out of email marketing typically doesn't mean that you won't see ads from us – please see our Cookie Policy on how you can opt out of web tracking, although it doesn't mean that you will opt out of ads altogether.

How you can opt-out of third party marketing such as from our customers

- Our customers are solely responsible for their own marketing emails and other communications and we cannot unsubscribe you from their communications.
- You can unsubscribe from our customers' marketing communications by clicking on the "unsubscribe" link located on the bottom of their emails, or by contacting them directly.
- If you believe any of our customers has engaged in unsolicited sending of mass email (or SPAM) and that they are using our Products and Services to do so, please contact us at abuse@optimizely.com.

How to contact us

If you are based in the European Economic Area, you can write to:

Episerver AB
c/o Legal Department
Box 7007
103 86 Stockholm
Sweden

- Send email to: privacy@optimizely.com.
- If you are based outside of the European Economic Area, you can write to:

Optimizely Inc.
c/o Legal Department
119 Fifth Avenue, 7th Floor
New York, NY 10003
USA

Changes to this Privacy policy

From time-to-time, we may change this privacy policy to accommodate changes to our Products and Services and companies, new technologies or industry practices, updated laws or regulatory requirements, and generally to keep it up to date. We will provide notice to you (as described below) if these changes are material.

Notices may be by email to the last email address you provided us, by posting notice of such change on our Websites or the Product and Services you use, or by other communication channels.

APPENDIX TO THE PRIVACY POLICY

Supplementary Provisions

Section A - UK and EEA Data Subjects

If you are an individual in the United Kingdom (UK) and/or European Economic Area (EEA), we collect and process information about you only where we have a legal basis for doing so under applicable laws (applicable law), which include (but are not limited to) the UK and EU data protection and privacy laws.

Legal basis for processing your personal information

The legal basis upon which we rely depends on which of our Products and Services you use and the reasons for which you contact us. We collect and use your personal information where:

- Contractual – performing any contract we have with you or to take steps at your request prior to entering into a contract with you.
- Legitimate Interests - this is necessary for our legitimate interests as a business and is not overridden by your legitimate privacy interests. These legitimate interests include our interest in:
 - operating and providing our Websites and our Products and Services, including to provide customer support and process your orders, requests, questions and concerns;

- collecting product usage, analytics and performance data relating to our Websites and our Products and Services, in order to maintain, analyze, develop, update, and improve them;
- maintaining records of bugs, customer support requests and similar requests you file, and our response to these requests;
- using information to personalize content and features on our Websites and our Products and Services;
- detecting, investigating and preventing activities that may breach or violate our policies or applicable laws (such as fraud detection and prevention);
- managing our business in an efficient and proper way, which includes managing financial administration, business capability, planning, communications, corporate governance and audit;
- maintaining corporate or business records consistent with our retention policies and applicable laws;
- protecting against activities that may threaten the security, integrity, or availability of our or another party's products, systems, and services;
- protecting our legal rights and defending claims; and
- for marketing and selling our Products and Services consistent with applicable laws.
- Consent - You give us consent to process your personal information.
- Legal Obligations - We need to process your personal obligation to comply with a legal obligation, such as a lawful subpoena or law-enforcement request or to fulfil the lawful instructions of our customers (when they are acting as the controller).
- Other - We have another lawful basis for processing your personal information in accordance with applicable law.

International data transfer

Within Optimizely

We may share your personal information within Optimizely relying on binding corporate rules in place from time to time.

With third parties

- Third parties to whom we provide your personal information may be located outside the UK and EEA or they may use servers that are located outside the EEA. In that event, we will ensure that adequate protection of your personal information is provided as required by applicable law, for instance by concluding Standard Contractual Clauses issued by the European Commission.
- Some vendors and service providers are based outside the EEA and UK, including the United States. Whenever we transfer your personal information outside the EEA and/or UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:
 - We will only transfer your personal information to countries that have been deemed to provide an adequate level of protection for personal data under applicable law.
 - Where we use certain service providers, we may use specific contracts approved for use in the UK and/or EEA that give personal information the same protection it has in the UK and/or EEA.

- In the case of specific service providers, we may implement supplemental safeguard measures, which may be technical, contractual and/or organisational in nature.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK and/or EU.

Your Rights

Under applicable law, you have the following rights:

- Access to your information: You have the right to request a copy of the personal information we hold about you.
- Correcting your information: We want to have accurate personal information about you. Please contact us if you think the personal information we hold is not up to date or correct and we will correct it for you.
- Deletion of your information: You have the right to ask us to delete personal information about you if it no longer is required for the purpose it was collected, you have withdrawn your consent, you have a valid objection to us using your personal information, or our use of your personal information is contrary to law or our other legal obligations.
- Objecting to how we may use your information: You have the right at any time to require us to stop using your personal information for direct marketing purposes. In addition, where we use your personal information on legitimate interest grounds then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.
- Restricting how we may use your information: In some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you have made to our use of your information. The right might also apply where there is no longer a basis for using your personal information but you don't want us to delete the information. Where this right is validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.
- Automated processing: If we use your personal information on an automated basis to make decisions that significantly affect you, you have the right to ask that the decision be reviewed by an individual to whom you may make representations and contest the decision. This right only applies where we use your information with your consent or as part of a contractual relationship with you.
- Withdrawing consent using your personal information: Where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which consent was given. Note, however, that this will not affect any processing that has already taken place.

Please contact us if you wish to exercise any of these rights. You can find the contact details below.

How to contact us

- We have appointed a Data Protection Officer. If you are a UK or EEA resident who requires assistance in exercising your privacy rights, please write to our Data Protection Officer at dpo@optimizely.com.

Complaints

- We always want to resolve directly all complaints about how we handle personal information.
- If you are an EEA resident, you also have the right to lodge a complaint with the Swedish Data Protection Authority (Datainspektionen). You can reach Datainspektionen using one of the following methods:

Postal address: Datainspektionen, Box 8114, SE-104 20 Stockholm

Office address: Drottninggatan 29, 5th floor, Stockholm

E-mail: datainspektionen@datainspektionen.se

Telephone: +46 8 657 61 00

- If you are a UK resident, you also have the right to lodge a complaint with the Information Commissioner's Office (ICO). You can reach the ICO using one of the following methods:

Postal address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow SK9 5AF

Email: <https://ico.org.uk/global/contact-us/email/>.

Section B - California Resident Notices

California Consumer Privacy Act

Effective January 1, 2020, the California Consumer Privacy Act of 2018 (the CCPA) allows consumers who are California residents, upon a verifiable consumer request, to request from a business:

- Delete any personal information about the consumer that the business has collected from the consumer;
- Disclose to the consumer certain information about the personal information that the business collects from the consumer; and
- Direct a business that sells personal information about the consumer to third parties not to sell the consumer's personal information.

Optimizely does not sell any consumer personal information to third parties. To submit a data access or data deletion request, please visit our portal or contact us at privacy@optimizely.com or 1-603-594-0249. Please note that these requests apply only to information that Optimizely holds as a "controller." If your request relates to the personal data collected through a customer's websites or digital products, you should direct your request to the owner of that website or product. Please note that you must verify your identity and request before Optimizely will process your request. You may be required to provide email confirmation or other information in order for us to verify your identity. Consistent with California law, if you choose to exercise your rights, you will not receive discriminatory treatment by Optimizely.

Under certain circumstances, you may designate an authorized agent to make a request on your behalf. In order to designate an authorized agent to make a request on your behalf, you must provide a valid power of attorney, your valid government-issued identification, and the authorized agent's valid government-issued identification to allow Optimizely to verify that the agent is authorized to make the request on your behalf.

If you have any questions about Optimizely's privacy policies and practices, please contact us at privacy@optimizely.com.

California's Shine the Light Law

CA Civil Code § 1798.83 permits California residents to request and obtain from Optimizely once a year, free of charge, a list of the third parties to whom Optimizely may have disclosed their personal information (if any) for their direct marketing purposes in the prior calendar year, as well as the type of personal information disclosed to those third parties. As a general policy, Optimizely does not share **personal information with third parties for their own direct marketing purposes without your prior consent. Accordingly, you can prevent disclosure of your personal information to third parties for their direct marketing purposes by withholdi**

Text missing

AB Tasty: General terms and conditions of use

AB TASTY

Simplified joint-stock (SAS) company with capital of 72,957.44€

NAF Code : 6202A

RCS Paris : 518 685 540

VAT intra-community : FR 92 518 685 540

Responsible for publication : Alix de Sagazan

AB Tasty is also an accredited training center.

Phone: +33 (0)1 84 17 87 52

Email: contact@abtasty.com

DATA HOSTING

The website <https://www.abtasty.com> is hosted by Kinsta Ltd.

Physical Address:

Kinsta WordPress Hosting

Unit 22 Bulrushes Business Park

Coombe Hill Road

East Grinstead

West Sussex

RH194LZ, UK

Email: dmca@kinsta.com

The AB Tasty Data Protection Officer is the ASTON AVOCATS Law Firm, 140, avenue des Champs-Élysées, 75008 PARIS, France, in the person of Christophe Lévy-Dières, a lawyer at the Paris Bar: 01 4494 0000; dpo@abtasty.com

1. PROTECTION OF PRIVACY

Personal data of Clients and Users such as name, identifier and business contact details (“Corporate User Client Data”) which is provided as part of the Client’s commercial relationship with AB Tasty, may be processed and stored outside of the Client’s country by AB Tasty, its affiliates or third party providers.

AB Tasty will be acting as a data controller in respect of the Corporate User Client Data collected for the purposes of this Agreement. Processing of Corporate User Client Data is based on the direct contractual relationship between AB Tasty and the Client and on the legitimate interest of AB Tasty to conduct justified and legitimate business according to applicable legislation.

AB Tasty shall use Corporate User Client Data to (i) perform its contractual obligations (including but not limited to administration of client relations and of payment transactions), (ii) customize, analyse and improve its products and services, (iii) prevent fraud and other prohibited or illegal activities, and/or (iv) send, in accordance with applicable law, Users' information on AB Tasty products, services and events which may be of interest to them.

AB Tasty shall keep Corporate User Client Data, for the course of the contractual relationship and, to the extent permitted by law, after termination of the Agreement.

Where permitted by law, Clients and Users have the right (i) to obtain access to their personal data, (ii) to amend such data, (iii) to be forgotten by AB Tasty, (iv) to restrict the processing, (v) to receive Corporate User Client Data concerning them, which they have provided to AB Tasty, in a structured, commonly used and machine-readable format, (vi) to object to the processing of Corporate User Client Data for the purposes of direct marketing and (vii) on legitimate grounds, to object to the use of such data, or to request that it be removed. Said right may be exercised at any moment by sending a request to AB Tasty at the following email address: dpo@abtasty.com, or by post to the company's postal address: [19 Rue Michelle-Comte, 75003 Paris](#). Affected individuals may also lodge a complaint with the competent supervisory authority.

Note that AB Tasty may be required to communicate the above information at the request of judicial, regulatory or administrative authorities.

2. USE OF AB TASTY SERVICES ON CLIENT WEBSITES / COOKIES

Use of AB TASTY Services on Client websites

AB Tasty provides a software solution known as Software as a Service, "SaaS" to enable marketing and statistical testing (A/B testing) on websites, intranet and mobile sites and mobile applications. AB Tasty therefore makes available an IT solution via internet which enables its Clients to collect online website usage statistics which is then reported on a web interface only accessible by AB Tasty Clients. Using the collected data, each Client is then able to improve the ergonomics of its website and the range of goods or services offered on it.

AB Tasty reminds its Clients, acting in their data controller capacity, that they must comply with any applicable data protection requirements including the General Data Protection Regulation (if applicable).

Clients undertake to inform their Visitors of the existence of processing carried out by AB Tasty, as well as to inform Visitors of their rights, including their right to access their data, their right to be forgotten, their right to object to processing, their right to demand rectification and removal of their personal data (e.g. IP address and cookies) and their right to opt-out as detailed below.

AB Tasty will be acting as a data processor in respect of the Visitor's data collected for the purposes of this Agreement. The subject matter of the data processing is the performance of AB Tasty Services.

Data collected by AB Tasty

When a Visitor consults the website of an AB Tasty Client, AB Tasty collects website usage statistics. Such information relates, for example, to the navigator used, the number of pages visited, the number of visits, tracking the Visitor's movements on a website, time spent on the website, on a particular page, filling or dumping the shopping cart, etc.

No primary personal data (name, first name, phone n°, address...) is gathered on AB Tasty's initiative when AB Tasty solutions are being applied.

Only two types of secondary data (i.e. data that might possibly lead to an individual in certain circumstances) are collected by AB Tasty solutions – cookies and IP n°.

Cookie and single visitor

A “cookie” is a text file which registers information regarding the Visitor's navigation. It is controlled by the browser.

For Visitors, “cookies” are the best means of personalising browsing. They often make it possible to avoid repetition of advertising messages, questions, and also to save time on websites where an identifier and/or a password is/are required.

For AB Tasty “cookies” ensure correct functioning of the solution and make it possible to guarantee the reliability of the testing by recognising a single visitor making different visits (recognising the same Visitor without knowing their identity). Such “cookies” in particular store the version of the testing used for the Visitor, for the sole purpose of representing the same version on that Visitor's subsequent visits and thus not causing any change in behaviour and thus skewing the results of the testing.

Results essentially concern browsing and behaviour: number of visitors, visits, pages visited and other information required to measure the performances of each version of the pages under testing. They therefore make it possible to improve the ergonomics and content of the websites visited.

The AB Tasty solution uses “first party” cookies, i.e. issued by the URL of the site using the AB Tasty service.

In accordance with European directive 2009/136/EC known as “E-Privacy directive”, its implementing legislation and the recommendations of CNIL (i.e. the French Data Protection Authority), cookies are only stored and read by the AB Tasty solution after the internet user has given consent to use of the cookies by AB Tasty's Clients. Visitors also have access to a management interface making it possible for them to change cookie settings. Finally, in compliance with the CNIL recommendations on cookies, it is specified that the lifespan of the cookies shall not exceed 13 months.

IP and Geolocalisation

On collecting and processing the data, AB Tasty uses the Visitor's IP for sole purposes of geo-localising the connecting device (regional details, potentially details of the town in some countries) to enrich the data collection.

The IP is deleted just after the operation of geo-localising and not stored by AB TASTY.

Blocking cookies

In any event, Visitors have control over the cookies since they are stored on the computer, at browser level. The Visitor is therefore able to read them, filter them, refuse them and suppress them.

Refusing a cookie via browser software

The Visitor may at any time choose to disable some or all of the Cookies. The browser may also be set as stated hereunder to indicate the Cookies saved in the terminal and request whether or not to accept them (on a case by case or overall basis). However disabling all Cookies shall prevent the Visitor from using the AB Tasty Website.

- Internet Explorer: Click on the Tools button, then on Internet Options. In the General tab, choose Browsing history, click on Settings. Then click Select files and select the Cookie(s) you wish to

disable. Then close the window containing the list of Cookies and click twice on OK to return to internet.

- Firefox browser: Click on the Firefox Menu icon, then on the Tools button, then Options; in the window that appears, select Privacy and collect Remove Specific Cookies. Select the Cookies you wish to disable then remove them.
- Safari: click on the Settings button, then on Preferences. In the window that appears, choose Privacy/Security and click on Show Cookies. Select the Cookies you wish to disable then click on Delete or Delete All.
- Chrome: click on the Google Chrome menu, then Settings. At the bottom of the page, click on Advanced Settings. In the Privacy section, click on Content Settings. To disable cookies: Select Block sites from storing any data. Click on Cookies and site data then move the mouse over the website which created the Cookie, and click on X in the right corner, or click on Remove All.

“Opt-out” option

AB Tasty offers Visitors an option to Opt-out, blocking collection of information on visits to the AB Tasty website as well as AB Tasty Client websites, for which sites AB Tasty collects data through its own cookie.

In order to enable this option, the Visitor must agree in advance to a cookie from the site in order to be able to proceed with the opt out request. If the cookie is not accepted, or if it is later deleted, AB Tasty may not be able to proceed with the request for non-participation and cookies will still be received.

To activate the opt-out option, at the end of the URL of the website for which the Visitor does not wish AB Tasty cookies to be collected/used, the Visitor adds the setting #abtastyoptout=1. For example, in order not to receive cookies on the pages of the AB Tasty website the Visitor must go to the <https://www.abtasty.com/#abtastyoptout=1> page.

The option does not delete pre-existing cookies but will prevent updates, and therefore no new data will be collected. Please note that if the Visitor cleans his cookies, deletes the exclusion cookie, or changes computer or browser, then the opt-out will have to be reinitiated.

3. INTELLECTUAL PROPERTY

The “AB Tasty” brand and associated logos are the exclusive intellectual property of AB Tasty and are not to be reproduced, used or represented in any form or format or by any medium whatsoever, without the express authorisation of AB Tasty.

All graphics, photos, animations, videos and texts contained on the AB Tasty website and more generally the items created to enable or facilitate browsing on the AB Tasty website – architecture, design, code pages, CSS pages, and other items – are the exclusive intellectual property of AB Tasty and are not to be reproduced, used or represented in any form or format or by any medium whatsoever, without the express authorisation of AB Tasty.

Users specifically undertake not to modify, copy, reproduce, download, circulate, transmit, commercially exploit and/or distribute by any means whatsoever any AB Tasty Services, AB Tasty webpages, or computing codes for items composing the AB Tasty services and the AB Tasty website.