

Last Updated: September 11, 2019

PESA Privacy Policy Overview

PESA is very committed to the security and privacy of our customers' data. This Privacy Policy details how we collect, use and disclose personal information and how we safeguard that data. Any personal data provided by you (whether through this website, in person, in connection with our products or services, or otherwise, collectively called "Services") will be treated by PESA in accordance with applicable data protection and privacy laws, and in accordance with this Privacy Policy. Your use of our Services is subject to the terms of this Privacy Policy. To the extent that PESA's website includes third party advertisements or links, the privacy policy of that advertiser or the owner of that link governs the use of any personally identifiable information collected during your access to that advertisement or link.

Changes

We may update this Privacy Policy when necessary to reflect changes in our Services, how we use personal information, or the applicable law. When we post changes, we will change the "Last Updated" date at the top of the Privacy Policy. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Information we collect

While using our Service, you may provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personal information may include, but is not limited to email address, first and last name, phone numbers, address, including city, state, province, postal zip code, country, region, cookies, addresses, and usage data. PESA will collect and "process" this data, which may simply mean we will store it electronically. Additional details:

- **Personal Information:** your name, address, email address, telephone number and service details (if applicable).
- **Information about use of our website:** including details of your internet protocol (IP) address, domain name, cookie details, browser version and operating system, traffic data, the web pages you viewed, and how long you stayed and location data from your IP address.
- **Information about use of our products and/or services:** product and services interests and preferences, other data you may provide us, including from forms you may fill out, products or services you indicate are of interest to you, or details you provide us about a service request.
- **Payment details:** such as credit/debit card number, billing address and expiration date.
- **Our correspondence:** normally, we will keep a record of correspondence, whenever you contact us.

How and when we collect information

Your personal information will mainly be collected directly, through our interactions with you in one or more of the following ways:

- When you use our website, we may obtain information via cookies and similar devices or forms you fill out online.
- When you register for events, such as tradeshow, training events, seminars, workshops you may fill out forms with your information. When you visit our trade shows, you may provide us information associated with your admission badge, business card or by filling out form.

- When you register for webinars or request other marketing collateral, you may be requested to fill out forms. We may also make note of the web pages and collateral you view.
- When you email us or otherwise contact us, you may provide us your contact information including email address and/or phone number.
- When you send us a service request, you may provide us contact information.
- When you purchase our products or services: you may provide us your contact information.
- If you apply for a position you may provide us information in connection with that application.
- When you provide a business card, you are providing us with contact information.

There may also be occasions when we collect information about you from third parties, such as, but not limited to, companies that provide badge scanning at trade shows that we attend.

Use of Your Data

PESA will use your personal information for the following purposes:

Use of Data	Data is used
To maintain our internal records	<ul style="list-style-type: none"> • in relation to any communications or interactions we have with you
To communicate with you	<ul style="list-style-type: none"> • to conduct our business, including responding to your queries, communicating with you, and/or to make good on our obligations arising from any agreements we (meaning you and us) have entered together.
To deliver products, services or information requested	<ul style="list-style-type: none"> • to process and handle service requests and to maintain, develop and improve our products and services.
To inform you of changes	<ul style="list-style-type: none"> • to notify you about changes to our products and services. This may take many forms including, email, newsletters, direct mail, etc.
For marketing purposes	<ul style="list-style-type: none"> • to provide you with updates, offers and communications about our products and services, to the extent permitted by law. You may unsubscribe from receiving marketing communications from us at any time as stated in the Marketing Communications section below.
To process payments	<ul style="list-style-type: none"> • to process payments to our contractors, employees and/or vendors and to process payments from our customers.
To help ensure website content is relevant	<ul style="list-style-type: none"> • to help ensure that content from our websites is presented in the most effective manner for you and for your device, which may include passing your data to business partners, suppliers and/or service providers. We also may use “Cookies” to provide a better

website viewing experience – please see section on Cookies below.

To comply with legal and regulatory requirements

- we may process your personal information to comply with our regulatory requirements or dialogue with regulators as applicable, which may include disclosing your personal information to third parties, courts and/or regulators or law enforcement agencies in connection with inquiries, proceedings or investigations by such parties anywhere in the world or where compelled to do so.

In relation to fraud prevention

- we and other organizations that undertake fraud checks may also access and use certain information to prevent fraud as may be required by applicable law and regulation and best practice at any given time. If false or inaccurate information is provided and fraud is identified or suspected, details may be passed to fraud prevention agencies and may be recorded by us or by them.

To evaluate information that you provide us

- such as a job application or service experience.

In addition to the third parties mentioned above, we may also disclose your personal data to third party service providers and our group companies who process your personal data on our behalf for the purposes set out above. We do not sell your information to advertisers.

Marketing Communications

We will only send you marketing communications if you indicate that you consent to receive such communications, when required by law. Where we have your consent or are otherwise permitted to do so, we may:

- send you information by mail, email or other methods of communication about trade shows we are attending, webinars, white papers or similar events or collateral.
- send you information by mail, email, or other methods of communication about new and existing products or services and special offers that we may be providing.

To stop receiving marketing communications from us, you can use the 'unsubscribe' or similar facility contained in any such communication or you can email us at the email address set out in "Contact us" below stating that you do not wish to receive further communications from us.

Public Forums

Please remember that any information (including personal information) that you submit, post or otherwise reveal in a public forum, including any such feature of our Services (such as a bulletin board, chat room, blog or product discussion forum) will be seen by third parties not related to us. If you are using such a public forum on any of our Services, you are not authorized to collect or use any personal information there (including to contact any individual other than through functionality provided by us in such public forum).

Transfer of Data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside United States and choose to provide information to us, please note that we transfer the data, including Personal Data, to United States and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Security of Data

The security of your data is important to us and we strive to take reasonable steps to protect your personal information, but no security system is 100% infallible and standard internet connections are not secure. We cannot and do not warrant that your personally identifiable information will not be disclosed or accessed by parties other than those authorized under these terms and conditions; however, we strive to use commercially acceptable means to protect your personal data. Please always think carefully about keeping your information secure and protecting it from vulnerabilities.

Where we have given you (or where you have chosen) a password that enables you to access certain parts of our websites, you are responsible for keeping this password confidential and for complying with any other security procedures that we notify you of. We ask you not to share a password with anyone.

Retention of Personal Information

We retain personal information for as long as necessary to provide the Services you have requested, or for other essential purposes based on business needs or legal requirements, including resolving disputes, and enforcing our agreements. Because these needs can vary for different data types in the context of different Services, actual retention periods can vary significantly based on criteria such as user expectations or consent, the sensitivity of the data, the availability of automated controls that enable users to delete data, and our legal or contractual obligations.

You may have the right to request to have your personal information changed, updated or deleted as described in the “Your rights” section above, but please note: (1) there might be some latency in deleting this information from our servers and back-up storage; and (2) we may retain this information if necessary to comply with our legal obligations, resolve disputes, or enforce our agreements. You can communicate your request by contacting us via e-mail at privacy@pesa.com

Links to Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Analytics

We may use third-party Service Providers to monitor and analyze the use of our Service.

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having your activity on the Service made available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about your activity during visits to the Service.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>

Tracking & Cookies Data

PESA may place information on your computer to allow PESA to identify you in the form of a "cookie". The use of cookies is an industry standard and many websites use them. This information is generally not linked to any personally identifiable information. We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

We also use Cookies to enhance the user experience, deliver personalized content, and collect information about the use of the Services we provide. We also use Cookies to prevent you from having to re-enter your identification and password information each time you use our Services, combat fraud, analyze and improve Service performance, and fulfill other legitimate purposes. Cookies are not designed to retrieve personal or business data from your hard drive, your email, or any other personal information.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Our websites may include cookies from third-party service providers, such as analytics, news content, videos, or ads. Since your browser connects to those third parties' web servers to retrieve that content, those third parties can set or read their own cookies on your device and may collect information about your online activities across websites or online services.

Statement Regarding Children

Our Service does not address anyone under the age of 13 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 13. If you are a parent or guardian and you are aware that your any of your Children has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from Children without verification of parental consent, we take steps to remove that information from our servers.

The European Union General Data Protection Regulation

If you use our Service while you are in the European Union, we are the data controller and processor of your Personal Data and are subject to the European Union General Data Protection Regulation (“GDPR”). Under Article 4 of the GDPR, “data controller” means the person or company that determines the purposes and means of processing Personal Data. Under Article 4 of the GDPR, “data processor” means a natural or legal person, public authority, agency or any other body that processes Personal Data on behalf of the data controller

The GDPR and the provisions in this Privacy Policy that pertain to the GDPR do not apply to you if you are not located in the European Union.

We adhere to the Directive of 1995 and the GDPR of May 25, 2018. We use your data to provide you with the best possible experience, products, and services on the Service. We use such data for the purposes of, among others, providing and managing your access to the Service; keeping our records up to date; personalizing and tailoring your experience on the Service; responding to communications from you; performing market research; analyzing your use of the Service and gathering feedback to continually improve the Service and your user experience; and supplying you with emails.

Under the GDPR, we shall ensure your Personal Data is processed lawfully, fairly, and transparently without adversely affecting you. We will only process Personal Data under one of the following bases:

- a. You have given consent to the processing of your Personal Data for one or more specific purposes;
- b. Processing is necessary for the performance of a contract to which you are a party or in order to take steps at the request of you prior to entering into a contract;
- c. Processing is necessary for compliance with a legal obligation to which we are subject;
- d. Processing is necessary to protect the vital interests of you or of another natural person;
- e. Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; and/or
- f. Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of Personal Data, in particular where the data subject is a child.

Point (f) shall not apply to processing carried out by public authorities in the performance of their tasks.

As it pertains to point (a), you will be deemed to have provided your consent when you expressly accept the terms of this Privacy Policy. You may withhold or withdraw your consent at any time using the contact details provided below.

Your Rights

Depending on where you are based you may have the right to ask us:

- a. to provide access to, and provide rectification or erasure of, personal information.
- b. to provide you with further details on how we use and process your personal information
- c. to provide restrictions on the processing of personal information under certain circumstances
- d. to delete personal information that we no longer have grounds to process
- e. if any automated processing of personal information is based on your consent or a contract with you, you have a right to transfer or receive a copy of your personal information in a usable and portable format;
- f. if the processing of personal information is based on your consent, you can withdraw consent at any time for future processing.
- g. for residents of France, you can send us specific instructions regarding the use of your data after your death.
- h. In addition, under certain conditions and depending on where you are based, you have the right to:
 - i. lodge a complaint with a supervisory authority;
 - ii. object to any processing of personal information on the “legitimate interests” or “public interest” grounds, unless our reasons outweighs your interests, rights and freedoms.
 - iii. object to direct marketing (including any profiling for such purposes) at any time as set out in the “Marketing Communications” section.
 - iv. ask us to transmit the personal data you have provided to us, if we still hold it, to a third party electronically.

These rights are subject to certain exemptions to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege) and may not all be available in the country in which you are based. If you have the right to do so, you can exercise these rights by contacting us at the “Contact us” section below. Please inform us if you are unsatisfied with how we have processed your Personal Data. You may contact us using the contact information provided below.

Contact us

If you have any questions about this Privacy Policy, please contact us at privacy@pesa.com or

PESA
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