

Ventiv Technology Website Privacy Policy

Ventiv Technology Inc. and Ventiv Technology Group International Ltd (“Ventiv Technology Inc.,” “We,” “Us,” “Our”) are part of **Symphony Technology Group**. Ventiv Technology’s websites are <http://www.ventivtech.com/>, <https://www.riskconsole.com>, <https://www.riskconsole.eu>, <https://rca.ventivtech.com>, <https://rca.ventivtech.eu>, <https://mobile-eu.ventivtechnology.com>, and <https://mobile.ventivtechnology.com>. This Privacy Policy explains how we use personal information we collect about you when you visit Ventiv Technology’s websites or use Ventiv Technology’s mobile applications.

Ventiv Technology Inc. provides customized risk management software and services to help companies manage their claims and exposure information. This [Website Privacy Policy](#) does not apply to personal information processed by our business customers or the services that we provide to our business customers.

Definitions

For this Policy, the following definitions apply:

- **'consent'** means your freely given, specific, informed and unambiguous expression of your wishes through a statement or other clear affirmative action such as checking a box which indicates your agreement to our processing of personal data relating to you.
- **'personal data'** or ‘personal information’ means any information relating to you from which you can be identified, directly or indirectly, including your name, identification number, location, online identifier such as your IP address or device ID, or one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity.
- **'processing'** means any operation or set of operations performed on personal data or on sets of personal data, including by automatic methods, such as collecting, recording, organizing, structuring, storing, adapting or altering, retrieving, consulting, using, disclosing, transmitting, sharing or otherwise making available, aligning or combining, restricting, erasing or destroying.
- **'third party'** means our business partners and service providers who we authorize to process your personal data to help us with: development, maintenance, and support of our websites and mobile applications, marketing research and analysis, communications, and customer service. It also includes government bodies and public agencies and authorities.

Topics

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What Information We Collect About You?

We collect information about you when you register an account with us or place an order for products or services or visit our websites.

We collect your Name, Email, Phone Number, Address, Payment Details, IP address, device ID and/or location if you provide it to us so we can contact you and process your order or account.

If you apply for a job on our website Careers page we also collect your employment history and IP address, device ID and location and hiring statistics if you provide them to us including your gender, ethnic and racial identification and veteran and disability status.

We also collect information about you when you visit our websites or access or use our mobile applications or our pages on social media websites. Information about you when you visit our websites is collected by cookies.

We also collect information about you when you voluntarily complete customer surveys, provide feedback to us, submit a review, testimonial, or blog.

How We Use Information About You?

We take reasonable steps to ensure that the personal information we collect from you is relevant and reliable for our processing and use, and accurate, complete and current as necessary for our uses. We will not process your Personal Information in a way that is inconsistent with the purposes for which we have collected it or for which you have given us your consent.

We collect information about you necessary to perform a contract with you including:

- processing your order or job application,
- managing your account,
- communicating with you,
- responding to your questions, comments, or postings,
- providing you customer service and technical support, and
- if you agree, to email you about other products and services, you may be interested in.

We use your information collected from our websites and mobile applications for our legitimate interests in:

- protecting the safety, security and legal rights of our business, websites, customers, and our business partners and service providers;
- improving our products and services;
- conducting research and analysis; and
- if you agree, to track your use on our websites and personalize your visits to our websites for marketing purposes.

How We Share Your Information?

We share your personal information:

- If you agree, with our Group of companies so that they can offer you their products and services;
- With service providers who help us with: development, maintenance, and support of our websites and mobile applications, marketing research and analysis, communications, and customer service. We do not authorize these service providers to use or disclose your personal information except as necessary to perform tasks we have asked them to do for us or to comply with legal requirements;
- To comply with laws or to cooperate with a legal investigation or a request from a government authority;

- To protect our legal rights and legitimate interests, and those of our business partners, service providers, and customers;
- To protect the legal rights, safety, and security of users of our websites.
- To prevent fraud;
- As a business asset in connection with a sale, merger, or other transaction of Ventiv Technology;
- In non-personally identifiable form; or
- With your consent.

We will not share your information for marketing purposes with companies outside of Ventiv Technology Inc. and Ventiv Technology Group International Ltd.

In processing your order or job application, we may send information about you to credit reference agencies and fraud prevention agencies and use information from those agencies.

In processing your job application, we may also share information about you with your former employers and may use information from them.

Your Rights Regarding Your Information

You have rights regarding the personal information we have about you.

You may object to, or restrict, our collection, use, sharing, transfer and/or storage of your personal information. You may also request a copy of the information that we have about you. You may also ask us to correct or remove information you think is incorrect.

If Ventiv's business customer (the data controller) is using Ventiv's products or services to process your personal information, you may contact Ventiv's business customer to object, restrict, access, correct or delete your personal information. If you need help finding contact information for a Ventiv business customer's privacy office, please contact us using our contact information below.

If you have a registered account in our system, you may object, restrict, access, correct, or request deletion or a copy of some of all of your personal information by logging in to your account or by contacting your account manager.

If you do not have a registered account or account manager in our system and you would like to object, restrict, access, correct, delete, or request a copy of some or all of your personal information, please email privacy@VentivTech.com write or call us at the following address:

Ventiv Technology Inc.
Privacy Officer
3350 Riverwood Parkway, 20th Floor
Atlanta, Georgia 30339
Phone: 770-308-5499

We will respond to your request within a reasonable period of time.

Please note, we will keep your personal information for as long as necessary for us to provide you services. We will also keep and use your personal information to comply with laws including tax laws, employment laws, social security and other applicable laws. We will also keep your information as necessary for and for backup, archiving, audit, preventing fraud, resolving disputes, and troubleshooting problems.

If you are located in the European Union (EU), European Economic Area (EEA) or Switzerland, please see also the EU-US and Swiss-US Privacy Shield section below about how to make complaints regarding data collected in the EU and transferred to the U.S. under the Privacy Shield Frameworks.

Marketing

We would like to send you information about products and services of ours and other companies in our Group that you may be interested in. If you have agreed to receive marketing messages from other companies in our Group or us, you may opt-out at any time.

You have a right at any time to stop other companies in our Group or us from sending you marketing messages or giving your information to other Ventiv Technology companies.

If you no longer want to be contacted by **us** about our other products and services, please visit the Ventiv Technology Communication Preferences website at <http://info.ventivtech.com/communication-preferences>.

If you no longer want to be contacted by **other companies in our Group** about their products and services, please visit the Ventiv Technology Communication Preferences website at <http://info.ventivtech.com/communication-preferences>.

If you want to opt-out of targeted interest-based advertising, please visit Network Advertising Initiative (NAI) Consumer Opt-Out website at http://www.networkadvertising.org/managing/opt_out.asp, or if you are located in the European Union/European Economic Area, please visit European Interactive Digital Advertising Alliance (EDAA) Your Online Choices website at <http://www.youronlinechoices.eu/>.

Please note you will continue to receive generic ads.

Because we plan our communications in advance, it may take several weeks for your opt-out request to take effect. If you continue to receive marketing messages from other companies in our Group or us after you opt-out, please let us know so that we can investigate the situation.

Cookies

Cookies are text files placed on your computer by websites to collect standard log information and visitor behavior information. Our service providers and we use cookies on our websites. Information from cookies is used to track your use on our websites and to make statistical reports on activity on our websites.

For more information about cookies visit Pinsent Masons About Cookies website at www.aboutcookies.org or All About Cookies.org at <http://www.allaboutcookies.org/>.

You can set your browser to reject cookies, and the above websites tell you how to remove cookies from your browser. In a few cases, some of our website features may not work when your browser does not accept cookies.

Some of our web pages use "Frames" to serve content to/from our business partners while preserving the look and feel of our websites. A Frame is a part of a web page or browser window which displays content independent of its container, with the ability to load content independently. Please be aware that you are providing your personal information to these third parties and not Ventiv Technology Inc.

We use Google Analytics and Bing Analytics, to help us measure visitors and trends for our websites. For more information about how Google collects, uses, and shares your information, please visit the Google Privacy Policy-Partners website at <http://www.google.com/policies/privacy/partners/>.

Your California Privacy Rights

If you live in California, California law allows you to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed your personal information (if any, and as defined under California law) for the third party's direct marketing purposes in the prior calendar year, as well as the type of your personal information disclosed to those parties. If you live in California and would like to request this information, please send your request in an email to privacy@VentivTech.com.

Transferring Your Information to Other Countries

Our websites and mobile applications are provided from within the United States and are subject to state and federal laws of the United States. If you are located outside the United States, your personal information is being transferred to, stored, used, and shared in the United States.

EU-US and Swiss-US Privacy Shield

Ventiv Technology Inc. complies with the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of your personal information transferred from the European Union and Switzerland, respectively.

Ventiv Technology Inc. has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms of this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles will govern.

We will comply with the Privacy Shield Principles for as long as we keep the Personal Information we collect about you under the EU-US and Swiss-US Privacy Shield Frameworks. To learn more about the Privacy Shield List and to view our certification please visit <https://www.privacyshield.gov/list>.

As explained above in this Privacy Policy, we sometimes share your Personal Information with third parties so they can perform services for us. If we share Personal Information, we have received under the Privacy Shield Frameworks with a third party, that third party's access, use, and disclosure of your Personal Information must also comply with our Privacy Shield obligations. We may be liable for any failure by any of our third parties to comply with the Privacy Shield Principles unless we prove that we are not responsible for the event giving rise to the damage.

Under the Privacy Shield Frameworks, we are subject to the regulatory and enforcement authority of the U.S. Federal Trade Commission. In certain situations, we may be required to disclose personal information requested by government authorities, including for national security or law enforcement purposes.

In compliance with the Privacy Shield Principles, Ventiv Technology Inc. commits to resolve complaints about our collection or use of your personal information.

If you are located in the European Union (EU), Switzerland or European Economic Area (EEA), and have a question or complaint regarding data collected in the EU or Switzerland and subsequently transferred to the U.S. under the Privacy Shield Frameworks should first be directed to privacy@VentivTech.com. You can also write or call us at the following address:

Ventiv Technology Inc.
Privacy Officer
3350 Riverwood Parkway, 20th Floor
Atlanta, Georgia 30339
Phone: 770-308-5499

Ventiv Technology Inc. has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to BBB EU PRIVACY SHIELD, a non-profit alternative dispute resolution provider located in the United States and operated by the Council of Better Business Bureaus.

If you do not receive timely acknowledgment of your complaint from us, or if we have not resolved your complaint, please visit <https://www.bbb.org/EU-privacy-shield/for-eu-consumers> for more information or to file a complaint. The services of the BBB EU Privacy Shield are provided free of charge to you.

If your Privacy Shield complaint is not satisfactorily addressed by this process, you may make a privacy and/or data use complaint about us to the UK Information Commissioner's Office (ICO) at <https://ico.org.uk/concerns/>

or by calling the UK ICO helpline at +44-0303-123-1113. You can also make a complaint to the Data Protection Authority in the EU/EEA Member State where you live or work by visiting the Office of the Data Protection Commissioner list of Data Protection Authorities at <https://www.dataprotection.ie/docs/European-Functions-Useful-Links/b/99.htm>.

Ventiv Technology Inc. commits to cooperate with the UK Information Commissioner's Office and/or the Swiss Federal Data Protection and Information Commissioner and comply with the advice given by the UK Information Commissioner's Office and the Swiss Federal Data Protection and Information Commissioner with regard to personal data transferred from the from the EU, EEA and or Switzerland.

Finally, as a last resort and in limited circumstances, you may be eligible to request binding arbitration under the Privacy Shield program described on the Privacy Shield Annex I website found at <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>.

Other Websites and Social Media

Our websites contain links to other websites. This privacy policy only applies to Ventiv Technology websites and mobile applications so when you visit or use other websites or mobile applications you should read their own privacy policies. Our websites, mobile applications, and communications may contain links to social media websites such as Facebook, LinkedIn, Twitter, and, or GitHub, etc., and social media features, such as the Facebook "Like" and "Share" buttons.

Social media sites and features may collect and use Personal Information from you. We have no control over and are not responsible for the privacy practices, policies, or content of any Social Media websites or Features, even if you link to them from, or use them, on Ventiv websites or mobile applications. This Privacy Policy does not apply to any Social Media websites or Features. When you link to Social Media websites or use their Features, you should read their own privacy policies.

LinkedIn and Job-Search Websites

In addition to on our website Careers page, you can apply for a job on our websites using LinkedIn and other job search websites. Those websites will verify your identity, give you the option to share personal information (such as your name and email address) with us, and auto-fill our job application signup form.

Internet Blogs/Forums

Our websites offer public blogs or community forums. Any information, including personal information, you share or post on those Blogs or in those forums is public and is not covered by this Privacy Policy. We are not responsible for the results of your blog or forum postings.

Security of Your Information

We use reasonable data security techniques to protect your information from unauthorized access, use and/or disclosure. No data security technique is 100% secure so we cannot guarantee that your personal information will never be accessed, used, or disclosed.

"Phishing" is a scam designed to steal your personal information. If you receive an e-mail that looks like it is from us asking you for information about you, please contact us.

Changes to Our Privacy Policy

We keep this privacy policy under regular review, and we will email you when we make changes in the future. We will also place any updates on our websites. This privacy policy was last updated on **February 22, 2018**.

How to Contact Us

Please contact us if you have any questions about our privacy policy or information we have about you:

Ventiv Technology Inc.
Privacy Officer
3350 Riverwood Parkway, 20th Floor
Atlanta, Georgia 30339
privacy@VentivTech.com

Appendix A: Record of Changes

Version Number	Date	Author/Owner	Description of Change
1.0	2/23/2018	CMR/Privacy	Original draft
2.0	3/21/2018	CMR/Privacy	Updated introduction section and contact section.