

Apporto's GDPR & CCPA Privacy & Cookie Policy

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www.apporto.com

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Apporto Corporation ("Apporto," "we," "our," or "us") is committed to protecting your privacy and safeguarding your personal data. This Privacy & Cookie Policy explains how we collect, use, disclose, and protect your information in compliance with the **General Data Protection Regulation** (GDPR), the California Consumer Privacy Act (CCPA), and other applicable laws.

1. Data Processor & Contact Information

For GDPR purposes, Apporto Corporation acts as the **Data Processor** of customer data, while customers serve as the **Data Controller**. However, when Apporto collects marketing data for its own use (and such data is not shared with customers), Apporto serves as the **Data Controller** for that data in that specific context only.

Contact:

Apporto Corporation 3558 Round Barn Boulevard, Suite 200 Santa Rosa, CA 95403 United States Phone: +1 (877) 751-4081

Email: <u>privacy@apporto.com</u>

2. Information Apporto Collects

Apporto may collect some of the following categories of personal data:

- Identifiers: Name, email address, phone number.
- **Usage Data:** IP address, browser type, operating system, device details, access times, and pages viewed.
- **Service Data:** Data entered or generated when using our virtual desktop, applications, or cloud services.
- **Support Data:** Records of communications with our customer service team.

Apporto does not collect sensitive personal data unless strictly necessary and only with the users' consent.

3. How Apporto Collects Customer Data

Apporto collects user data only in the following situations:

- Directly from the user when they create an account, contact support, or use our services.
- Automatically via technical logs when the user accesses Apporto websites or applications.
- From third-party service providers that help deliver Apporto's services.

4. Purpose & Legal Basis for Processing

Apporto processes personal data only when we have a lawful basis, such as:

- **Contract performance** to provide and manage our services.
- Legitimate interests to improve our services and maintain security.
- **Legal obligations** to comply with applicable laws.
- **Consent** where required for optional features.

5. How Apporto Uses Customer Data

Customer personal data is used to:

- Operate, maintain, and improve our services.
- Provide secure user authentication.
- Respond to inquiries and support requests.
- Monitor usage for performance and security purposes.
- Fulfill legal obligations.
- Apporto uses Zendesk, a customer support platform, to handle support enquiries. Zendesk may process personal data on our behalf in the United States and other locations. Transfers are safeguarded by Standard Contractual Clauses and other measures in accordance with UK and EU data protection law.

6. Data Sharing and Disclosure

Apporto does not sell or share personal customer data. Apporto shares information only with:

• Service providers under strict contractual obligations.

- Legal authorities if required by law.
- **Corporate transactions** such as a merger or acquisition.

7. International Data Transfers

If customer data is transferred outside of the customer's jurisdiction, including outside the European Economic Area (EEA), Apporto applies safeguards such as **Standard Contractual Clauses (SCCs)** in place with data sub-processors to protect all data.

8. Data Retention

Apporto retains customer data only for as long as necessary to fulfill the purposes stated in this policy or as required by law.

9. Your Rights Under GDPR

If you are in the EEA or UK, you have the right to:

- Access your personal data.
- Request correction or deletion.
- Restrict or object to processing.
- Data portability.
- Withdraw consent at any time.

Because Apporto acts as a **Data Processor** and not a **Data Controller**, you should direct such requests to your employer or educational institution, which serves as the Data Controller for your information.

10. Your Rights Under CCPA

If you are a California resident, you have the right to:

- Know what personal data Apporto collects, uses, and shares.
- Request deletion of your personal data.
- Request a copy of your personal data.
- Be free from discrimination for exercising your rights.

Because Apporto acts as a **Data Processor** and not a **Data Controller**, you should direct such requests to your employer or educational institution, which serves as the Data Controller for your information.

11. Security Measures

Apporto implements technical and organizational measures, including encryption, access controls, and monitoring, to protect personal data from unauthorized access, disclosure, or misuse.

12. Third-Party Links

Our services may contain links to third-party websites. Apporto is not responsible for their privacy practices.

13. Cookies & Tracking Technologies

Apporto uses cookies and similar technologies to ensure the proper functioning of our services, to enhance the user experience, and to analyze usage patterns. Apporto does not use cookies for marketing purposes, targeted advertising, or cross-site tracking. However, certain third-party tools integrated into our services may deploy their own cookies, which are subject to the privacy policies of those third parties.

Types of Cookies Apporto Uses

- **Strictly Necessary Cookies:** Required for our website to function and cannot be disabled.
- Performance Cookies: Help us understand how users interact with our services.
- Functional Cookies: Remember user settings and preferences.

Your Cookie Choices

You can manage or disable cookies through your browser settings. Disabling some cookies may affect the availability or functionality of our services.

14. Changes to this Policy

Apporto may update this Privacy & Cookie Policy from time to time. The updated version will be posted here with a new effective date.

15. Contact Information

If you have questions or wish to exercise your privacy rights, contact us at:

Apporto Corporation

3558 Round Barn Boulevard, Suite 200 Santa Rosa, CA 95403 United States Phone: +1 (877) 751-4081

Email: privacy@apporto.com

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