

Alogent Privacy Policy

Last modified: May 24, 2018

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

Collection and Use of Personal Information

Personal Information we collect online

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

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

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

How we collect

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

Using Cookies: Cookies are pieces of information stored directly on the device you are using. Cookies we use do not contain or capture unencrypted Personal Data. Cookies allow us to collect information such as browser type, time spent on the Site, pages visited, and your relationship with us. We use the information for security purposes, to facilitate navigation, to display information more effectively, to personalize/tailor your experience while engaging with us, and to recognize your device to allow your use of our online products and services.

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

How we use Personal Data

We may use personal data:

- to respond to your inquiries and fulfill your requests;
- to inform you about important information regarding the Site, products or services for which you apply or may be interested in applying for, or in which you are already enrolled, changes to terms, conditions, and policies and/or other administrative information;
- to deliver marketing communications that we believe may be of interest to you, including, ads or offers tailored to you;

- to send email newsletters and commercial messages to readers who have voluntarily opted to receive the products and provided their email address. Each email we send includes an "opt-out" link readers can use to remove themselves from the distribution list

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

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

How we share Personal Data

We do not share this information with anyone else.

Data Integrity and Security

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

Children's Privacy

Alogent does not knowingly collect, maintain, or use Personal Data from children under 13 years of age, and no portion of this website directly solicits children under the age of 13 and we request that these individuals do not provide Personal Data through the Site. If you learn that your child has provided us with Personal Data without your consent,

you may alert us at privacy@alogent.com. We will take steps to delete it if we learn we have collected it.

Terms for Disclosing Personal Data

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

European Personal Data

Legal Bases for Processing

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

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

When confidential commercial information, including European Personal Data, is received by Alogent, the data is an electronic copy of the original data set. We do not maintain or update the content of the data received. Alogent temporarily uses this data in a controlled environment for supporting our banking clients and/or performing software updates. The data is not used by Alogent to make any decisions upon an individual such as credit, finance, accounting, or benefits, nor is this data used to perform any type of transaction processing. Therefore, any data access or modifications

should be requested through the original party and data controller who collected and maintains the original and active copy of the data.

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

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

Data Subject Rights

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

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

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

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

Restriction of processing: To request restriction of processing of personal data about such individual for certain reasons, such as, for example, if such individual considers personal data collected by us to be inaccurate or has objected to the processing and the existence of legitimate grounds for processing is still under consideration.

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

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

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

EU-U.S. Privacy Shield Framework

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

If you have an unresolved concern related to your European Personal Data that we were unable to first address through direct contact, we have selected the International Centre for Dispute Resolution/American Arbitration Association to serve as our independent dispute resolution body for the Framework. As such, please contact, free of charge, the ICDR/AAA website at: <http://go.adr.org/privacyshield.html> to submit a complaint.

We are also subject to the investigatory and enforcement powers of the Federal Trade Commission with respect to the Framework. We may be required to disclose European

Personal Data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

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

Reporting Violations

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

Contact Alogent

Attn: Compliance

350 Technology Parkway

Peachtree Corners, GA 30092

privacy@alogent.com