



noHold Privacy Policy

Article I. noHold Privacy Policy

(last update: March 27, 2020)

At noHold Inc. ("NOHOLD"), we are committed to protecting your privacy and providing you with the most powerful and secure online experience. You can travel through most of this web site (this "Site") without giving us any information about yourself. But sometimes we do collect information to provide services and/or information that you request, and this statement of privacy (this "Privacy Policy") explains data collection and use practices of NOHOLD in those situations. Please read this Privacy Policy.

Article II. Collecting your Personally Identifiable Information

We may collect information that personally identifies you ("Personally Identifiable Information" or PII) or allows us to contact you. Generally, this information is requested when you are requesting additional information, or to be contacted by a sales representative. Personal information collected by this Site often is limited to first and optionally last names, e-mail address, and business phone number. You can avoid supplying Personally Identifiable Information by limiting what information you supply to us.

Our products are cloud based, and when you buy a product you will be submitting additional information to our servers. However, that information is controlled by your user agreement. This policy concerns information collected on our website, and not information transmitted by users of our services.

Article III. Use of your Personally Identifiable Information

We may use your personal information for the following purposes:

- To proceed with a subscription to a mailing list and to make this Site easier for you to use by not making you enter your personal information more than once.



- To deliver information that you request.
- To help us create and publish content most relevant to you.
- To alert you to product upgrades, special offers, updated information and other new services from NOHOLD.
- To correspond with you and/or to respond to your inquiries, request for information or any other message posted through this Site.
- To send you newsletters, direct marketing information and to perform market research or surveys, unless if you have requested NOHOLD to not contact you for this purposes by clicking on the appropriate option or by editing our updating your personal profile.

By accepting the Terms of Use (this Privacy Policy being part of it), NOHOLD assumes that you have given your permission to collect and use your personal information as per this Privacy Policy.

Article IV. Information Sharing

We may provide and share your Personally Identifiable Information to our affiliated companies, subsidiaries or business partners on a need to know basis to support us for the above usage purposes.

We also occasionally hire other companies to provide limited services on our behalf, including packaging, mailing and delivering purchases, answering customer questions about products or services, sending postal mail and processing event registration. We will only provide those companies the information they need to deliver the service, and they are prohibited from using that information for any other purpose.

NOHOLD may disclose your personal information 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 NOHOLD or this Site; (b) protect and defend the rights or property of NOHOLD, its affiliated companies or subsidiaries and its family of Web sites, or (c) act in urgent circumstances to protect the personal safety of users of NOHOLD, its Web sites, or the public.



In the event that NOHOLD sells or transfers all or part of its business, your Personally Identifiable Information collected through this Site could be transferred to the company acquiring such business unless you instruct NOHOLD not to do so.

Article V. GDPR Principles

Your information may be stored and processed in the United States or any other country in which NOHOLD or its affiliates, subsidiaries or agents maintain facilities, and by using this Site, you consent to any such transfer of information outside of your country. NOHOLD complies with the General Data Protection Regulation otherwise known as GDPR. The following GDPR principles outline the way that noHold uses Personally Identifiable Information and your rights as a user of this Site.

Article 5(1) requires that personal data shall be:

- a) processed lawfully, fairly and in a transparent manner in relation to individuals ('lawfulness, fairness and transparency');
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes ('purpose limitation');
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in



the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals ('storage limitation');

- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

Article VI. Control of your Personal Information for California Residents

You can and should control what information you provide to NOHOLD. When you give us personal information, NOHOLD will not share that information with third parties without your permission, other than for the limited exceptions already listed. It will only be used for the purposes stated above. NOHOLD may send out periodic e-mails informing you of technical service issues related to a product or service you requested as they are essential to the use of the product or service.

Our Company would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

- **The right to access** – You have the right to request Our Company for copies of your personal data. We may charge you a small fee for this service.
- **The right to rectification** – You have the right to request that Our Company correct any information you believe is inaccurate. You also have the right to request Our Company to complete the information you believe is incomplete.
- **The right to erasure** – You have the right to request that Our Company erase your personal data, under certain conditions.
- **The right to restrict processing** – You have the right to request that Our Company restrict the processing of your personal data, under certain conditions.



- **The right to object to processing** – You have the right to object to Our Company’s processing of your personal data, under certain conditions.
- **The right to data portability** – You have the right to request that Our Company transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email:

Email us at: info@nohold.com

Or write to us:

Attn: Privacy Department
225 South Milpitas Boulevard
Milpitas, CA 95035

Article VII. Access to your Personally Identifiable Information

We will provide you with the means to ensure that your personal information is correct and current. You may review and update this information or request deletions of any and all of your personal information at any time by submitting an email to info@nohold.com.

Article VIII. Security of your Personally Identifiable Information

This Site strictly protects the security of your Personally Identifiable Information and honors your choices for its intended use. We carefully protect your data from loss, misuse, unauthorized access or disclosure, alteration, or destruction. Your personal information is never shared outside NOHOLD without your permission, except under conditions explained above. Inside NOHOLD, data is stored in password-controlled servers with limited access.

You also have a significant role in protecting your Personally Identifiable Information. As an example, no one can see or edit your personal information without knowing your password, so do not share



this with others. If you believe that your password has been compromised, you should immediately change your password.

Article IX. Data Collected Outside this Site

While travelling through this Site, you may encounter links to third parties web sites (such as site of NOHOLD business partners); even though a connection might be made to such third parties sites, NOHOLD is not responsible for their respective and own privacy policies.

Article X. Use of Cookies and Other Mechanisms

To ensure we are publishing content users need and want, this Site collects information, including site-visitation statistics using cookies. We use this information in aggregated form and use site-visitation statistics for improving this site.

When someone visits this Site, a cookie is placed on the user's machine (if the user accepts cookies) or is read if the user has visited this Site previously.

Web beacons, also known as clear gif technology, or action tags, assist in delivering the cookie. This technology tells us how many visitors clicked on key elements (such as links or graphics) on this Site. We do not use this technology to access your personally identifiable information on this Site; it is a tool we use to compile aggregated statistics about this Site usage. We may share aggregated site statistics with partner companies but do not allow other companies to place clear gifs on our sites.

If you choose to not have your browser accept cookies from this Site, you will be able to view the text on the screens, however you will not experience a personalized visit nor will you be able to subscribe to the service offerings on this Site.

- **What types of cookies do we use?**

There are a number of different types of cookies, however, our website uses:

Functionality – Our Company uses these cookies so that we recognize you on our website. This includes an anonymous session ID and the type of device from which you are accessing our Site



(e.g., Desktop, Mobile, Tablet).

Advertising – Our Company does not use advertising cookies.

- **How to manage cookies**

You can set your browser not to accept cookies, and the cookie preference manager on this Site tells you how to remove cookies from your browser.

Article XI. Collecting Your Domain Information

NOHOLD also collects domain, IP, browser, language, and country of origin information as a part of our analysis of the use of our web sites. This data enables us to become more familiar with the individuals who visit our web sites and pages, how often they visit, and what parts of the web sites they visit most often. NOHOLD uses this information to improve our web-based offerings. This information is collected automatically and requires no action on your part.

Article XII. Children's Information

NOHOLD web sites do not target, and are not intended to attract, children under the age of 13. NOHOLD does not knowingly collect personal data from children under the age of 13 or send requests to children for personal data.

Article XIII. Changes to this Privacy Policy

NOHOLD will occasionally update this Privacy Policy. When we do, we will also revise the "last updated" date at the top of this Privacy Policy. For material changes to this Privacy Policy, NOHOLD will notify you by placing prominent notice on this Site.

Continued use of this Site implies your acceptance of any changes to this Privacy Policy.

Article XIV. Contact information

If you have any question about this Privacy Policy, please contact us at info@nohold.com.