

## Atlatl PRIVACY SHIELD NOTIFICATION

*Effective and last revised May 24, 2018*

This Privacy Shield Notice (“Notice”) describes how Atlatl SOFTWARE, INC. (“Atlatl”) and its subsidiaries and affiliates in the U.S. (“Atlatl”, “we”, “us”, or “our”) collect, use and disclose certain personally identifiable information transferred from the European Union to the United States. Atlatl has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. This Notice supplements our Privacy Policy located at <https://www.atlatlsoftware.com/privacypolicy> (“Privacy Policy”); if there is any conflict between the terms in this Notice, the Atlatl Privacy Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern with respect to Personal Data transferred to the US from the EU. For more information about the Privacy Shield, and to view our certification, visit the Privacy Shield website located at [www.privacyshield.gov](http://www.privacyshield.gov).

For purposes of this Notice, “Personal Data” means information that (i) is transferred from the European Economic Area (“EEA”) to the United States, (ii) is recorded in any form, (iii) is about, or relates to an identified or identifiable consumer, customer, customer supplier or other individual. This Notice outlines our general policy and practices for implementing the Privacy Shield principles for Personal Data.

Atlatl adheres to the Privacy Shield principles of notice, choice, accountability for onward transfer, security, access, data integrity, and enforcement and oversight.

### **1. Personal Data Collection and Use**

Our Privacy Policy describes the categories of Personal Data that we may collect as well as the purposes for which we use the Personal Data. We may receive the following categories: name, physical address, zip code, email address, phone number, and demographic data. We use the Personal Data of consumers, customer, suppliers and others (i) to respond to their request, (ii) to evaluate the quality of our products and services, (iii) to communicate with them about our products, services and related issues, (iv) to notify them of and administer offers, contests, sweepstakes, and other promotions, and (v) for internal administrative and analytics purposes, and (vi) to comply with our legal obligations, policies and procedures. Before we use your Personal Data for a purpose that is materially different than the purpose we collected it for or that you alter authorized, we will provide you with the opportunity to opt out.

### **2. Sharing of Information**

In addition to using the information collected by Atlatl for the purposes described in this document, we may also share your information with various third parties who perform functions on our behalf as described in our Privacy Policy. Where required by the Privacy Shield, we enter into written agreements with those third parties requiring them to provide the same level of protection the Privacy Shield requires and limiting their use of the data to the specified services provided on our behalf. We take reasonable and appropriate steps to ensure that third parties process Personal Data in accordance with our Privacy Shield obligations and to stop and remediate any unauthorized processing. Under certain circumstances, we may remain liable for the acts of our third party providers who perform services on our behalf for their handling of Personal Data that we transfer to them.

### **3. Security**

Atlatl takes reasonable and appropriate administrative, technical and physical safeguards in an attempt to help protect your Personal Information from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction.

### **4. Access Rights**

You may have the right to access the Personal Data that we hold about you and to request that we correct, amend, or delete it if it is inaccurate or processed in violation of the Privacy Shield. These access rights may not apply in some cases, including where providing access is unreasonably burdensome or expensive under the circumstances or where it would violate the rights to someone other than the individual requesting access. If you would like to request access to, correction, amendment, or deletion of your Personal Data, you can submit a written request to the contact information provided below. We may request specific information from you to confirm your identity.

### **5. Questions or Complaints**

You can direct any questions or complaints about the use or disclosure of your Personal Data to us at [privacy@atlatlsoftware.com](mailto:privacy@atlatlsoftware.com). We will investigate and attempt to resolve any complaints or disputes regarding the use or disclosure of your Personal Data within 45 days of receiving your complaint. For any unresolved complaints, we have agreed to cooperate with ICDR/AAA. If you are unsatisfied with the resolution of your complaint, you may contact ICDR/AAA at ([www.icdr.org](http://www.icdr.org)) for further information and assistance.

### **6. Binding Arbitration**

You may have the option to select binding arbitration for the resolution of your complaint under certain circumstances, provided you have taken the following steps: (i) raised your complaint directly with Atlatl and provided us the opportunity to resolve the issue; (ii) made use of the independent dispute resolution mechanism identified above; and (iii) raised the issue through the relevant data protection authority at no cost to you.

### **7. Contact**

If you have any questions on our Privacy Shield Notice or our practices concerning Personal Data, you can contact us at:

Phone Number: 843-314-1860

Email address: [privacy@atlatlsoftware.com](mailto:privacy@atlatlsoftware.com)

By mail: 658 King St.

Charleston, SC 29403

### **8. Amendment**

We reserve the right to amend this Notice from time to time consistent with the Privacy Shield Principles.