

## **Midaxo Privacy Policy**

Please read this Privacy Policy (“Policy”) carefully before using Midaxo or the [www.midaxo.com](http://www.midaxo.com) website. This Policy is applied to the processing of personal data and Personally Identifiable Information collected through the website [www.midaxo.com](http://www.midaxo.com) as well as through the Midaxo cloud application and related discussion forums made available by Midaxo. Using Midaxo or Midaxo’s website constitutes agreement by a user (“user”, “you”, “your”) to the Policy and its terms.

This Policy addresses the handling of online personal data and 'Personally identifiable information' (PII), which is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context.

The term ‘personal data’ and the term ‘Personally Identifiable Information’ mean roughly the same thing. Personal data is the term used especially in EU, while Personally Identifiable Information is the equivalent of personal data in US. There are differences between the terms, but for practical purposes in the context of Midaxo they are sufficiently close, therefore, when we refer to personal data below in this document, we mean both the EU and US term of it.

### **Collecting your information**

When subscribing to Midaxo or registering on Midaxo’s site, you may be asked to enter certain information such as your name, email address, mailing address, phone number, company name or other details to help you with your experience.

Midaxo may also collect information from you when you place an order, subscribe to a newsletter, respond to a survey, speak with Midaxo’s sales or support staff, fill out a form, or interact with Midaxo or Midaxo’s website.

Personal data contained in Midaxo’s customer data register may be located at a physical location of Midaxo’s choosing, including in the member states of the European Union, the European Economic Area and/or the United States.

### **Using your information**

Midaxo may use the personal data to improve your user experience and to improve its services in the following ways:

- To personalize a user's experience and to allow Midaxo to deliver the type of content and product offerings in which you are most interested.
- To improve Midaxo’s website in order to better serve you.
- To allow Midaxo to better service you in responding to your customer service requests.
- To quickly process your transactions.
- To send periodic emails regarding your order or other products and services.

### **Protecting your information**

Your personal data is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems and are required to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted e.g. using Secure Socket Layer (SSL) technology. We do not use vulnerability scanning and/or scanning to PCI standards. We do not use Malware Scanning. All transactions are processed through a gateway provider and are not stored or processed on our servers.

## **Cookies**

Midaxo may use “cookies” or similar technologies to improve its products, services and your user experience. Cookies are small files that are transferred to your computer through your Web browser (if your computer has enabled cookies) that allows a site to recognize your browser and capture and remember certain information. For instance, Midaxo may use cookies to help it remember where you are in the trial tour. Cookies are also used to help Midaxo understand your preferences based on previous or current site activity, which enables Midaxo to provide you with improved services. Midaxo may also use cookies to help it compile aggregate data about site traffic and site interaction to offer better site experiences and tools in the future.

Midaxo may also use trusted third party services that track collected user information on its behalf.

If you disable cookies on your computer, some features of Midaxo may be disabled or may have diminished operation. However, you can still place orders for the Midaxo cloud service over the telephone by contacting Midaxo customer service.

## **Third party disclosure**

We do not sell, trade, or otherwise transfer your personal data to outside parties without your permission. Some functions of Midaxo may use third party functionality which may require provision of personal data as necessary to said third parties. In this case, you will be notified of this, for example when you register for a service that Midaxo provides in conjunction with a trusted third party that requires such necessary personal data. Midaxo may provide necessary personal data to its website hosting partners and other parties who assist in operating its website, conducting its business, or servicing you consistent with the terms of use and other agreements with you in connection with using Midaxo. Any third parties which receive necessary personal data are required to keep this information confidential consistent with the present Policy. Midaxo may also release your personal data as necessary to comply with a lawful court order, subpoena, to enforce our site policies, or protect the safety of others.

Notwithstanding the above, non-personally identifiable information may be provided to other parties for other uses as seen fit by Midaxo.

## **Third party links**

Midaxo’s site may offer third party products or services, including links to third party sites. These third party sites may have separate and independent privacy policies, or none. Midaxo is not responsible for the content or other policies of third party sites. Nonetheless, any feedback about linked third party sites may be submitted to Midaxo using the provided links on Midaxo’s site.

## **Google**

Midaxo may use Google AdSense advertising, including the Demographics, Analytics and Interests Reporting functionality thereof, including so-called DART cookies, DoubleClick cookies. Users may opt out of such features as provided by Google in the applicable feature links and settings. Information about this feature can be found in [AdWords policies](#).

You can set preferences for how Google advertises to you using the Google Ad Settings page in your browser. Alternatively, you can opt out by visiting the Network Advertising initiative opt out page or permanently using the Google Analytics Opt Out Browser add on.

## **California Online Privacy Protection Act**

CalOPPA requires commercial websites and online services to post a privacy policy such as this one and applies to collection of information from California consumers. This Policy is therefore conspicuously indicated on Midaxo's site, which can be visited anonymously. More information can be found at: <http://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT51.dpuf>

Midaxo's intention and policy is to honor established do-not-track (DNT) protocols with respect to cookies and advertising. Midaxo does not allow third party behavioral tracking.

## **COPPA (Children Online Privacy Protection Act)**

Regarding the collection of personal information from children under 13, the Federal Trade Commission enforces the Children's Online Privacy Protection Act (COPPA), which spells out what operators of websites and online services must do to protect children's privacy and safety online. Midaxo does not specifically market to children under 13.

## **Fair Information Practices**

The information networks to which we are all connected are not entirely within Midaxo's control. However, Midaxo's intention and policy is to follow Fair Information Practices Principles and reasonable individual redress principles if and as required by applicable statutes. Midaxo's intention and policy is to notify you within 1 business day via email should a data breach occur which Midaxo determines affects personal data you provided to Midaxo.

## **CAN SPAM Act**

Midaxo's intention and policy is to comply with the terms of the CAN-SPAM Act. The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations. We collect your email address in order to:

- Send information, respond to inquiries, and/or other requests or questions.
- Process orders and to send information and updates pertaining to orders
- Send you additional information related to your product and/or service.
- Market to our mailing list or continue to send emails to our clients after the original transaction has occurred

To be accordance with CANSPAM we agree to the following:

- NOT use false, or misleading subjects or email addresses
- Identify the message as an advertisement in some reasonable way
- Include the physical address of our business or site headquarters
- Monitor third party email marketing services for compliance, if one is used.
- Honor opt-out/unsubscribe requests quickly
- Allow users to unsubscribe by using the link at the bottom of each email

If at any time you would like to unsubscribe from receiving future emails from Midaxo, you can follow the instructions at the bottom of each email sent by Midaxo.

### **Information about the Correction and Deletion of Data**

Your information is shown in Midaxo when you have a Midaxo account. You can view data about yourself, and if necessary, correct it. If this is not feasible, you can address other requests for information, correction or deletion to [security@midaxo.com](mailto:security@midaxo.com).

### **Information about statements of Consent**

You are giving your consent to the collection, use and storage of your personal data when subscribing to Midaxo Newsletter at Midaxo web pages.

You are entitled to withdraw your consent at any time by confirming your wish to [security@midaxo.com](mailto:security@midaxo.com) or your Midaxo representative.

### **Data privacy provisions in the Midaxo SaaS agreement**

You are also advised to refer to the data protection and data security provisions outlined in the Midaxo SaaS Agreement.

### **Contacting us**

If there are any questions regarding this Policy you may contact us using the information below.

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Boston, MA 02210  
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