



## Privacy Statement

This Privacy Statement tells you about the collection, use, and disclosure of information related to, and your rights in respect of, the data South River Technologies, Inc. ("Company", "We", or "Us") collects and process related to your use of our <https://southrivertech.com/> website, all domains that route to our primary corporate website (e.g., [www.titan-dmz.com](http://www.titan-dmz.com), [www.webdrive.pro](http://www.webdrive.pro), etc.), our LinkedIn page at <https://www.linkedin.com/company/south-river-technologies>, our corporate events (such as technology conferences, networking events, tradeshow or trainings) and other electronic services that link to this Privacy Statement (collectively the "Service(s)" and such locations or applications, the "Sites"). Please be sure to read this entire Privacy Statement before using the Service. If you are using our Webdrive product with Google Drive, please see the section below entitled "Webdrive Users and Google User Data."

### Background and Overview

In general, We collect information about visitors to our website and/or corporate events, potential and current customers, suppliers, or partners in connection with our Services, or when you otherwise interact with us. This can include:

Information voluntarily provided to us by website visitors, customers, suppliers, partners, event participants and other individuals, such as:

- contact details, including name, address, company name, email and telephone number;
- account information, if applicable; comments on our LinkedIn postings;
- financial and transaction data, including purchase history, payment and billing information;
- information given to us by customers and other individuals, such as referrals or other contacts

Information required to operate our business or information provided during use of our Products, such as

- information necessary to register and secure customer accounts, including a username (no personal information is required to be included in the username);
- other information relating to your interactions with Us, including requests for customer or sales support, feedback, and payment for the purchase of our products and services;
- information provided when you visit our website or any of our offices, or attend a Company technology event.

Usage, analytics and navigational information, such as:

- clickstream information, such as which search engines our website visitors use most frequently;
- uses of our software and the frequency of customer interactions with content within our platform;
- IP address and MAC address when our Services phone-home to our license management system (for purposes of confirming compliance with our software license use restrictions).



### General privacy statement

Subject to our more explanatory statement below, we do not sell your personal information and, except for relationship messaging from us, we do not share your contact information with third parties except with your consent (opt in), which opt in can be via connecting your account with third party accounts.

### Acceptance

By registering for or otherwise using the Service, you agree to the terms of this Privacy Statement. Specifically, you authorize the collection, processing, retention, and disclosure of Information about You by Company and its affiliates, business partners, and service providers for the purposes described in this Privacy Statement or as described to you during your interactions with the Service. For example, We might clarify our practices when you register or when you use the Service, or one of its functions, for the first time.

### Effective Date and Changes to this Privacy Statement

This Privacy Statement is updated as of February 1, 2024. We reserve the right to update this Privacy Statement. If We update this Privacy Statement, We will use reasonable electronic efforts to advise you of the change, which may include posting a notice of the change in the Service (for example when you login), or we may send you an electronic notification of the change. If We notify you by an electronic communication, We will provide these electronic messages to your last known or provided electronic communication address (which may be for example, a text message address or other site address). You are responsible to review communications we send to those addresses, to authorize communications from us, and to keep those addresses up to date. Use of the Service after our notice of a change in the Privacy Statement is acceptance of the terms and changes in the updated Privacy Statement, which shall, unless expressly prohibited by applicable law (or unless expressly stated in such changed Privacy Statement), be effective from the inception of your use of the Service.

**NOTICE REGARDING NON-SALE OF PERSONAL INFORMATION.** We collect and process your personal information as described below solely for use in providing Services to you. Some government jurisdictions take a broad view of “sale of personal information” to include use of anonymized and de-identified data shared with companies such as Google. As noted below, we do not sell your Personal Information.

### NOTICE AT COLLECTION

**THIS IS A NOTICE TO YOU CONCERNING, AND BY USING THE SERVICE, YOUR CONSENT, TO THE COLLECTION AND USE OF PERSONAL INFORMATION ABOUT YOU COLLECTED AND USED BY COMPANY.**



Categories of personal information we collect and the purpose for which we collect such data: The categories of personal information we collect and associated examples are below:

Category	Examples (not exhaustive)	Purpose for which we collect and use this information
Personal identifiers	Name, address, phone number, social media names, email address	We use personal identifiers to communicate with you, and to verify your identity. We obtain personal identifiers manually directly from you, or from authentication providers we may link to our service, such as Google, Amazon, Microsoft. We use this information to verify your claimed identity and to provide you our Services. We use third party contractors under contracts with us, who assist us to provide the Service. These contracts with contractors restrict use of your information to providing the Services.  If you opt in to marketing communications, we use your personal identifiers to send you communications from companies and businesses that have products and services that we believe you may be interested in.
Device information	Browser user agent and internet protocol address	We use Device information to monitor and improve the Services and user experience and for analytics. This information is shared, on an anonymized basis, with analytics service providers we may use.
Bank / credit card information	Credit card number, identifying information related to credit card and payment card data	We use third-party payment processors and merchant services to process your payment. We do not store, or have access to, your credit card number, banking information, or any other payment/financial information.

Uses of Information about You

We use the information about you to provide the Service, to fulfill your information requests, and contact you as you have requested. We may also use information about you to improve our products or the content of our Service, and for our analysis.

Exchanging information with Other Parties

Except as disclosed above in the section “NOTICE AT COLLECTION” We do not share information about you with third parties.



### Managing Information about You

To keep the information that you provide via this Service accurate, current, and complete, please contact Us as specified below and We will take appropriate steps to update or correct such information in our possession, or to make changes to the Information about You so that we no longer contact you for certain purposes. We may make some or all of these options available in the Service interface, in which case you will manage your own preferences.

### Communicating with You

We may communicate with you through electronic communications and through the Service, such as through the use of notifications and alerts. You may manage certain other ways in which We communicate with you. For example, you may subscribe or unsubscribe to certain electronic communications from Us, such as for notifications and information about updates to the Services. You may not unsubscribe from administrative Service and electronic messages that We may send, such as to alert you of changes in our Privacy Statement or Terms of Service.

### Links to Other Services

The Service may provide hyperlinks and references to other websites or allow you to connect your information on this Service to such sites. Our Privacy Statement does not apply to those websites, and we are not responsible for the content or function of those websites. We encourage you to become familiar with the privacy practices of the other websites that you use.

### Contacting Us

We are happy to hear from you. If you have any questions about this Privacy Statement or the practices of the Service, you may contact Us at [privacy@southrivertechnologies.com](mailto:privacy@southrivertechnologies.com)

### Other Special Considerations

#### Technology Logging, Cookies, and Related Techniques

When you interact with the Service, your browser or other device may communicate other technical information that we use as part of our Services. For example, as you use the Service, your browser or other device communicates with our technology, which in turn keeps records of your interactivity and requests for services and content to assist Us in managing and improving the utility of the Service, and to conduct research and analysis on its use. The types of such interactive information may include your Internet Protocol (IP) address, browser / device type, URL, requests made, device identification information, and related technical usage information. We use cookies and other remote side storage technology to authenticate you to the Service, maintain your session, to analyze how the Service is used, to keep track of your progress in viewing a video or other content, to link information about how you use the Service with your account, and to help tailor our Services. The Service may not function properly if your browser or device is configured so it does not accept these associated cookies and other technical means.



## WebDrive Users and Google User Data

If you are a WebDrive user (<https://southrivertech.com/webdrive/>) and elect to connect Google Drive, this section applies to You. WebDrive allows Google Drive Users to access your files and folders via a mapped drive letter in Windows or iOS. Once You have authenticated to Google Drive, You can access the files selected and view or edit them. WebDrive does not access files that the You have not requested to view.

### ***What Google user data is collected by Our Webdrive application?***

WebDrive prompts users to authenticate using the OAuth Process and then presents Google user data/files to properly authenticated users for their access, editing, and transferring. WebDrive does not store any personal data or user data, including Google user data. South River Technologies never has access to any user Google Data.

### ***How and when do We retain and delete your Google user data?***

Google user data is neither stored nor retained by the WebDrive application or by South River Technologies. File contents are not examined by WebDrive or South River Technologies in any way.

### ***With Whom do We share, transfer, or disclose Google user data?***

Neither the WebDrive application nor South River Technologies shares, transfers, or discloses Google user data with any other entity, organization, or individual.

### ***How does Our Webdrive application use Google user data?***

WebDrive does not use Google user data. WebDrive is a pass-through mechanism for customers to access their Google files and content.

## Information about Children

Our Services are intended for use strictly by adults. We do not knowingly solicit or collect any personal information from children.

## Rights under Laws

You may have additional rights under state law to access certain information. For example California residents may have rights under California Code Section 1798.83. We honor those rights.

General Privacy Control (GPC). You may set a browser or other device to automatically send a “do not track” or “do not sell” or other privacy signal to our servers, which is generally known as the general privacy control (GPC) signal. See, generally, [globalprivacycontrol.org](http://globalprivacycontrol.org). We do not use the GPC to opt out of selling your personal information, instead, please use this link [privacy@southrivertech.com](mailto:privacy@southrivertech.com).

## Location of Processing

Company is a United States of America business with its core operations in the United States. Information about You may be processed by Us, our affiliates, business partners, or service providers in the United States.



## Your rights under certain laws

This section describes certain rights you may have under the California Consumer Privacy Act of 2018 (CCPA) as amended by the California Consumer Privacy Act (CPRPA), other similar state laws applicable in the United States, and under Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (“GDPR”). Collectively the above referenced laws and regulations are referred to herein as the “Data Privacy Laws.”

### Process for Exercising your rights in Personal Data

For those users of our Services and Sites who are residents of countries in the European Union (or that have equivalent rights, such as residents of the Great Britain), the State of California, or certain other states that have adopted laws similar to CCPA/CPRPA, we have created the following mechanisms and practices to provide you with the following control over your personal information that comprises personal data as defined under GDPR, or personal information as defined under the CCPA/CPRPA (references below to “Personal Data” are meant to also encompass the term “personal information” under the CCPA/CPRPA and similar laws):

#### A. What are your rights?

If any of your Personal Data provided to Company is subject to the Data Privacy Laws, you have a number of rights. Further information and advice about your rights can be obtained from the data protection regulator in your country (under the GDPR) or typically from your state Attorney General, under CCPA/CPRPA and other state laws.

**IMPORTANT:** When you contact Company to exercise your rights it is very important for security verification and other purposes that you use any email address that you know is associated with the Personal Data about which you are contacting Company. Be aware that Company may use reasonable efforts to verify your identity to ensure that it does not disclose Personal Data to an impostor.

Please also be aware that we cannot search, and therefore cannot locate, any stored documents or information that are encrypted in a manner that precludes us from accessing the unencrypted information.

#### 1. The right to *object to processing* of your Personal Data (the right to *opt out*)

You have the right to object to certain types of processing, including processing for direct marketing (i.e. if you no longer want to be contacted with potential opportunities from third parties).

**HOW TO EXERCISE YOUR RIGHT:** If you want to object to certain types of processing, please direct your communication to our Privacy Officer as noted below, providing specific and detailed information regarding your objection and requested action.

Be aware that you cannot object to certain types of processing of your Personal Data, which limitations are set forth in the Data Privacy Laws. If Company determines that it is required to continue to process your Personal Data it will provide you the basis on which it has made this determination.



## 2. The right to an *accounting of the processing* (the *right to know*)

You have the right to be provided with clear, transparent, and easily understandable information about how we use and process your Personal Data. This is why we are providing you with the information in this privacy policy.

**HOW TO EXERCISE YOUR RIGHT:** If you have questions about the privacy policy or how Company may be processing your Personal Data, please direct your communication to our Privacy Officer as noted below and please be specific and detailed about your questions and Company will promptly address those questions.

## 3. The *right of access*

You have the right to obtain access to your Personal Data (if we are processing it), and certain other information about Our privacy practices with respect to your Personal Data (similar to that provided in this Privacy Statement).

This is so you are aware and can check that we are using your information in accordance with GDPR/CCPA/CPRA or any other applicable data protection laws.

**HOW TO EXERCISE YOUR RIGHT:** If you have questions specific to your Personal Data and how Company is using it in accordance with GDPR, CCPA/CPRA or other applicable laws, please direct your communication to our Privacy Officer as noted below, and please be specific and detailed about your questions and Company will promptly address those questions.

## 4. The right to *rectification*

You are entitled to have your Personal Data corrected if it is inaccurate or incomplete.

**HOW TO EXERCISE YOUR RIGHT:** If you believe your Personal Data processed by Company is incorrect and needs to be updated or otherwise corrected, please check your settings with respect to your account, and if you still believe your Personal Data is inaccurate, direct your communication to our Privacy Officer as noted below.

## 5. The right to *erasure* (the *right to delete*)

This is also known as “the right to be forgotten” and, in simple terms, enables you to request the deletion or removal of your Personal Data where there’s no basis for us to continue to process it or to retain it. This is not a general right to erasure; there are exceptions as stated in the Data Privacy Laws.

**HOW TO EXERCISE YOUR RIGHT:** If you no longer want Company to have and/or process your Personal Data, to the extent we do not provide a self-service means of deleting your Personal Data, please direct your communication to our Privacy Officer as noted below.

(NOTE: Consistent with Data Privacy Laws Company may retain a trivial amount of information, for example, to keep a record of its compliance with your request.)



#### 6. The right to *restrict processing*

You may have rights to “block” or suppress further use of your Personal Data that Company processes. When processing is restricted, we can still store your Personal Data but may not use it further. We may keep lists of people who have asked for further use of their information to be “blocked” to make sure the restriction is respected in future, but also be aware that upon making this request, we may terminate your account and delete your Personal Data instead of restricting the processing of it.

**HOW TO EXERCISE YOUR RIGHT:** If you want to restrict, or terminate restrictions, on Company’s processing your Personal Data, please direct your communication to our Privacy Officer as noted below.

#### 7. The right to *data portability*

You may have rights to obtain and reuse your Personal Data for your own purposes across different services. For example, if you decide to switch to a new provider of services like the Services from Company that you subscribed to, this enables you to move, copy, or transfer your Personal Data.

**HOW TO EXERCISE YOUR RIGHT:** Company may have or may in the future provide you with the ability to download your Personal Data. If Company has done so, please use these functions to obtain a copy of your Personal Data. If Company has not enabled this functionality, and if you want Company to export your Personal Data for portability, please direct your communication to our Privacy Officer as noted below.

(NOTE: Company will retain and continue to process your Personal Data unless you also request to be forgotten or request restricted or blocked processing.)

#### 8. The right to *lodge a complaint*

You have the right to lodge a complaint about the way we handle or process your Personal Data with your national data protection regulator (GDPR/UK) or applicable state regulator (under CCPA/CPRA or other state law). However, we hope you will contact Company first (by calling or emailing our Privacy Officer as noted below) so Company can try to address your complaint directly.

**HOW TO EXERCISE YOUR RIGHT:** If you want to lodge a complaint with Company, please direct your communication to our Privacy Officer as noted below.

#### 9. The right to *withdraw consent*

If you have given your consent to anything we do with your Personal Data, you have the right to withdraw your consent at any time. This includes your right to withdraw consent to us using your Personal Data for marketing purposes.

**HOW TO EXERCISE YOUR RIGHT:** If you want Company to withdraw your consent to process your Personal Data, please either use out functionality in the Sites to make such a request, or if we have not enabled such functionality, direct your communication to our Privacy Officer as noted below.





10. The right to be *free from discrimination* for exercising your rights.

We cannot deny goods or services, charge you a different price, or provide a different level or quality of goods or services just because you exercised your rights under Data Privacy Laws. However, if you refuse to provide your Personal Data to us or exercise one of your rights, for example, to delete your Personal Data or restrict its processing, and that Personal Data or processing is necessary for us to provide you with services, we may not be able to complete that transaction and we may terminate your access to the Services.

You may report any claim that we have engaged in discrimination against you to an applicable regulator, though we would prefer that you first contact our Privacy Officer as noted below so that we may address your concern.

B. Notice regarding costs to exercise rights.

First, to the extent Data Privacy Laws requires us to take an action without charging you, we will comply with those legal requirements. In some cases we may be permitted to charge for some of these services. We usually act on requests and provide Personal Data free of charge, but in such cases we may charge a reasonable fee to cover our administrative costs of providing the Personal Data, which such costs can arise in one or more of the following cases, which are not meant to express all the instances in which we may charge a fee:

Baseless or excessive/repeated requests, or

Further copies of the same Personal Data.

Alternatively, we also may be entitled to refuse to act on the request. Please consider your request responsibly before submitting it. We will respond as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we will come back to you and let you know.

C. Company's Retention of Personal Data Under Data Privacy Laws.

We only retain your Personal Data for as long as is necessary for us to use your information as described above or to comply with our legal obligations and legitimate interests. Please be advised that this means that we may retain some of your Personal Data after you cease to use our Services. For instance, we may retain your data as necessary to meet our legal obligations, such as for tax and accounting purposes.

Our service is not a backup service. We do not assume an obligation to retain your information.

When determining the relevant period in which we retain or establish/revise periods for retaining Personal Data, we will take the following factors into account:

Our contractual obligations and rights in relation to the information involved, including contractual obligations we may owe to our customer;



Legal obligation(s) under applicable law to retain data for a certain period of time or with respect to pending or anticipated legal actions;

Our legitimate interest where we weigh your interest in controlling your Personal Data and against our lawful purpose in processing your Personal Data;

Statutes of limitations under applicable law(s);

If you have made a request to have your information deleted; and

Guidelines issued by relevant data protection authorities.

Otherwise, pursuant to Data Privacy Laws, we will securely erase your Personal Data once there is no lawful basis or legal obligation to store or process it.

D. Data Security.

We have implemented measures designed to secure your Personal Data from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on servers or in locations in data centers that we control or manage such resources.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Sites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we take reasonable effort to secure your Personal Data, we cannot guarantee the security of your Personal Data transmitted to our Sites or via our Services. Any transmission of Personal Data is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Sites or via the Services.

Where noted above when contacting us about privacy matters, please contact Us at [privacy@southrivertechnologies.com](mailto:privacy@southrivertechnologies.com).