

PRIVACY STATEMENT

SMB GROUP, INC.

SMB Group respects your privacy. The type of information and ways we collect and use the information you provide while on our website (“Site”), and during certain other interactions are listed below:

WHEN DOES SMB GROUP COLLECT INFORMATION?

SMB Group may collect certain information when an individual:

- Registers for use of the Site or uses the Site.
- Registers for use of the SMB Group online social media communities or posts information on a shared area of the Site.
- Purchases certain products or services from us.
- Registers for one of our events or webinars.
- Respond to surveys, polls or assessments.
- Wish to obtain more information about our products and services.

WHAT INFORMATION DOES SMB GROUP COLLECT?

- Personal contact information you may choose to provide while visiting or registering on our Site, including registrations to attend SMB Group events and webinars. This information may include your: name, address, company name, job title, telephone number, email address, and the name and email of third parties you may provide to us.
- If you register to participate in SMB Group online communities or other shared areas of the Site, you may be asked to create a profile. Your profile may be made available to other members of the shared site(s) and may include the registration information you provide as well as other information you choose to add such as work history and education.
- Behavioral information about how you use the Site and your IP address.

HOW DOES SMB GROUP USE THE INFORMATION?

- **To fulfill our obligations.** SMB Group uses personal contact information you share with us to fulfill contractual obligations that may include providing products or services that you or your employer purchased, answer your contract administration related inquiries or communicate with you about your account or transactions with us, and send you information about features on the Site, or changes to our policies or events for which you registered.
- **To improve research, the Site and measure effectiveness.** SMB Group regularly analyzes data pertaining to visitor trends, research consumption, and research grading to improve our research, plan site enhancements, and measure overall site effectiveness.
- **To maintain a secure Site.** IP addresses are collected in order to maintain our Site security and ensure access to restricted portions of the Site is limited to authorized users.
- **To improve our performance by using third party vendors.** We may also disclose certain data to third party contractors or vendors in connection with their performance of services to us. Contractual agreements between us and such third parties provide that your information will be kept confidential and secure.
- **To send you marketing emails subject to your opt-in.** If you opt into such communications, SMB Group may use your email address to send periodic promotional emails and special offers.
- **To enable SMB Group online communities.** If you participate in SMB Group online communities or other shared services, your profile information may be shared with other members to enable collaboration.
- **To conduct research on topics of interest to SMB Group and its customers.**

PURSUANT TO WHAT LEGAL BASES DO WE PROCESS YOUR INFORMATION?

We rely on a number of legal bases to use your information in the ways indicated above. These legal bases include where:

- necessary to perform the contractual obligations in our agreement with you or your employer and provide services to you;
- you have consented to the processing, which you can revoke at any time;
- necessary to comply with a legal obligation, a court order, or to exercise or defend legal claims;
- necessary for the purposes of our legitimate interests; and
- you have expressly made the information public.

Note that we principally rely on consent (i) to send marketing messages, and (ii) for sharing data of event attendees with sponsors post event.

Where we process your information on the basis of legitimate interests, we do so as it is necessary to pursue our legitimate interests of providing and improving SMB Group services for our customers. SMB Group has a legitimate interest in understanding how our services are being used. We also pursue our legitimate interests of improving our services, efficiency, and determining the level of interest in services for customers by obtaining insights into usage patterns of the services.

SMB Group has a legitimate interest in customizing your on-site experience to help you discover relevant research and topics. SMB Group also engages third-party companies and individuals (such as research companies, and analytics providers) to help us operate, provide, and market the services. These third parties have only limited access to your information, may use your information only to perform these tasks on our behalf, and are obligated not to disclose or use your information for other purposes. SMB Group may also use your information to maintain a secure Site, including sharing of your information for such purposes, because it is necessary to pursue our legitimate interests in ensuring the security of our services, including enhancing protection of our Site, intellectual property infringement and security risks of all kind. SMB Group has a legitimate interest in working with service providers to make our services better even if some service providers we use are not strictly necessary for us to provide the Services.

SMB Group may also process and share your personal information with a third party in response to lawful requests by public authorities, including to meet legitimate national security or law enforcement requirements; defend against legal claims, to comply with a subpoena, court order, legal process, or other legal requirement; or when we believe in good faith that such disclosure is reasonably necessary to comply with the law.

COOKIES

- What are cookies?
A cookie is a small text file that a website saves on your computer or mobile device when you visit the site. It enables the website to remember your actions and preferences (such as login, language, font size and other display preferences) over a period of time, so you don't have to keep re-entering them whenever you come back to the site or browse from one page to another.
- What types of cookies does SMB Group use?
 - Necessary: cookies required for access to the Site and core functionality.
 - Behavior and analytics: cookies used to gather behavioral information through the Site; provide customized content and recommendations; and analytics.
 - Marketing: cookies that are used to deliver relevant advertising.
- Behavioral information collected by our web analytics vendor is used to analyze data pertaining to visitor trends, research consumption, and research grading in order to improve our research, plan Site enhancements, and measure overall Site effectiveness. We may also use cookies or web beacons to help us offer you products, programs, or services that may be of interest to you and to deliver relevant advertising. We may use third-party advertising companies to help tailor Site content to users or to serve ads on our behalf. These companies may also employ cookies and web beacons to measure advertising effectiveness.

- Aggregated (non-personally identifiable) user behavior collected through cookies or web beacons may be shared with our other third-party service providers to either analyze or execute marketing programs.
- Please note that SMB Group or other SMB Group vendors or third-party advertisers may also use cookies that are independent of those placed by our analytics contractor (for example, to remember your password or tailor Site content).
- Cookies and web beacons do not contain personally identifiable information; however, if you are a registered user, we may store this information with your registration information to enable us to better serve you. Use of cookies may also allow SMB Group to automate your access to password-protected portions of the Site making it unnecessary for you to have to re-enter your password each time you visit our Site.
- What can you do about cookies?
You may choose to control and/or delete all cookies from your hard drive. If you delete a cookie, however, please be advised that some features of our Site may not be accessible to you. Another option available to you is to change the preferences or settings in your web browser to control cookies. In some cases, you can choose to accept cookies from a primary Site, block them from third parties, or clear out all cookies.

TRANSFER OF DATA

- We operate globally and may transfer your personal information to our affiliate companies or third parties in locations around the world for the purposes described in this privacy policy. Wherever your personal information is transferred, stored, or processed by us, we will take reasonable steps to safeguard the privacy of your personal information. Additionally, when using or disclosing personal information transferred from the European Union, we use standard contract clauses approved by the European Commission, adopt other means under European Union law for ensuring adequate safeguards, or obtain your consent.

WHAT YOU CAN DO AND YOUR RIGHTS

- You can unsubscribe from promotional emails you receive at any time by clicking the link at the bottom of the email and may disable notifications on your mobile device. You may not be able to opt-out of important service announcements and administrative messages.
- You can choose to control and/or delete cookies from your hard drive. See the Cookie section above for more details.
- You can choose to not let anyone scan a bar code at a SMB Group event unless you want that sponsor to have your contact information.
- When attending a sponsored session at an event you can inform a SMB Group representative that you do not want your information shared with the event sponsor.
- There may be public areas of the Site that allow you to post or upload information. Any information you choose to upload or post can be viewed by all users. We discourage you from uploading any personal information in these areas of the Site.
- If you are using Tap and you do not want your name or user ID associated with Your Taps, you can choose not to link to your Facebook profile, however, this may diminish your user experience and lower the credibility of Your Taps. You may delete your account and the Tap application from your mobile device if you no longer wish to access Tap, but Your Taps will remain on Tap even after such deletions.
- You have the following rights. Please note SMB Group may have lawful reasons to deny requests related to the rights below:
 - The right to be informed: You have the right to be informed of SMB Group's purposes for processing your personal data, SMB Group's retention periods for that personal data, and who it will be shared with.
 - The right of access: You have the right to access your personal data and supplementary information to allow you to be aware of and verify the lawfulness of the processing.
 - The right to rectification: You have the right to have inaccurate personal data rectified or completed if it is incomplete.

- The right to erasure: You have the right to have your personal data erased from our systems.
- The right to restrict processing: You have the right to request the restriction or suppression of your personal data.
- The right to data portability: You have the right to obtain and reuse your personal data for your own purposes across different services.
- The right to object: You have the right to object to processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling); direct marketing (including profiling); and processing for purposes of scientific/historical research and statistics.
- Rights in relation to automated decision making and profiling: You have rights related to automated decision making any profiling. Please note that SMB Group does not make any such automated decision making or profiling.
- If you want to exercise any of your rights or need to contact SMB Group, please email sanjeev.aggarwal@smb-gr.com. You can always contact SMB Group at +1 508-410-3562 should you have any questions or concerns.

ADDITIONAL INFORMATION THAT MAY BE OF INTEREST

- SMB Group account managers, analysts, and other members of the research staff can place research documents into a client's Research Bookmarks. To prevent duplicate placement of research, research and account management employees can review the contents in this area.
- We have implemented technical, administrative, and physical security measures that are designed to protect your information from unauthorized access, disclosure, use, and modification. Please be aware though that, despite our best efforts, no security measures are perfect or impenetrable.
- SMB Group does not knowingly collect any personal information from children and does not market or offer services to children. You must be at least 13 years of age to access the Site.

CHANGES

Changes to this policy may be posted from time to time. We encourage you to visit this page periodically for changes.

Last updated June 1, 2018