



Privacy Policy

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Winland Electronics, Inc. (“Winland,” “we,” “us,” or similar terms) is pleased to make information about our business, products, and services, as well as our INSIGHT™ platform, available to users via our websites located at winland.com and winlandinsight.com, and through our mobile applications available via the Apple App Store and Google Play Store (collectively, the “Services”). Winland is committed to protecting the privacy of our Services users and clients. The purpose of this Privacy Policy is to inform you about the types of information we gather about you when you interact with our Services or use certain products or features, how we use that information, and how we disclose it to third parties.

Please read this Privacy Policy carefully. **By using the website or one of our products or services you launch from our website, or otherwise providing information to us, you consent to our collection, use, and disclosure of your personal information in accordance with this Privacy Policy.** The effective date of this Privacy Policy is posted above. We may update this Privacy Policy from time to time. If we make updates, we will revise the date at the top of this Privacy Policy, and if required by law, we may provide you with additional notice (such as by adding a statement to our homepage or by sending you an email). We encourage you to review this Privacy Policy whenever you access the Services to stay informed about our information practices and the choices available to you.

Information We May Collect or Receive About You

For the purposes of this Policy, “personal information” is any information that identifies, relates to, or can be used to contact a particular individual. The types of personal information we collect include the following categories:

- Contact information – first name, last name, business email address, business mailing address, business billing address, telephone number (personal or business), and employer and employment details.
- Account information – if you register to use our Services, your username, account password, account number, and other information that we may request or that you may provide relating to your account.
- Transaction information – details about your company’s transactions with us, including method of payment, payments received, payment details, transaction history, and other information relating to the products or services purchased by your company.
- Payment information – if you enter into a transaction with us that requires payment, we will collect your payment information, such as payment card information, bank account/routing information, billing address, and other similar billing information. Note, all payments are processed on our behalf by our third-party payment processor.
- Marketing information – details regarding informational and promotional materials you may have requested or received from us, the products in which you are interested, your receipt of promotional communications, and information on your marketing or communication preferences.
- Communication information – copies of communications and inquiries you transmit or submit via our Services to other users, including through email, telephone call, video call, chat, and similar features available in our Services.
- Customer support information – details of any communications or inquiries you submit to us, including technical or customer support requests, through email, calls, chats, our software applications, or other features available in our Services.
- Device and usage information – details regarding how and when you use our Services, including the device used to connect to our Services, your IP address and device identifier, the frequency and duration of your



usage, the pages you view, what websites or search terms referred you to our Services, and information about your interaction with our Services.

We collect this information when you access, use, or navigate our Services, fill in forms on our Services, request information via our Services, communicate with us or another user (including by phone, email, chat, or otherwise), interact with any chatbot or similar features available in our Services, visit or engage with our social media pages, participate in surveys or sponsored activities, or otherwise provide us with personal information.

Please note that we may aggregate or anonymize the foregoing types of data such that they are no longer capable of identifying you, in which case they are no longer considered “personal information.”

Automatically Collected Usage and Device Information

Like most website and mobile application operators, we use passive information collection technologies to collect personal information about your interaction with our Services, such as your internet protocol address (“IP address”), the identity of your Internet Service Provider, the name and version of your operating system, the name and version of your browser or device, the date and time of your visit, and the pages you visit. These technologies include:

- Cookies - A “cookie” is an example of a passive information collection technology. It is a file that our (or a third-party) web server may send to your browser or device when you access our Services. This file is then stored on your browser or device. Winland may use cookies and certain other technologies to allow our Services to “remember” your personal preferences. You can also learn more about cookies by visiting www.allaboutcookies.org.

Winland may use “session” cookies. Session cookies are temporary bits of information that are erased once you exit your web browser window or otherwise turn your device off. Session cookies are used, for example, to improve navigation on our Services, and to collect aggregated statistical information.

Winland also may use “persistent” cookies. Persistent cookies are more permanent bits of information that are placed on your browser or device and stay there unless you delete the cookie. Persistent cookies store information on your browser or device for a number of purposes, such as retrieving certain information you have previously provided (e.g., passwords), helping to determine what areas of the web visitors find most valuable, and customizing the Services based on your preferences on an ongoing basis.

- Log files – We use log files to track actions occurring on the websites and mobile applications and collect data about visitors, including IP address, browser type, Internet service provider, referring/exit pages, date/time stamps, and device identifiers. This information is used for security purposes and to detect and prevent fraud.
- Pixels, tags, and web beacons – Our Services may also use “pixels,” “tags,” or “web beacons.” These technologies are small pieces of code that run when a website or mobile application page or email is loaded. They are used to monitor the behavior of the visitor or email recipient—such as what icons were clicked or whether links in an email were opened—and gather analytics. For example, when you open the winland.com homepage, or log into a Winland mobile application, a pixel or similar piece of code may run and generate information based on the visit, and then this information is processed by us or our vendors. Pixels work in conjunction with cookies to let us know what portions of our Services are of interest to you and to help us provide you with tailored information from our Services. If you turn off cookies, the pixels, tags, and web beacons we use may still detect certain information about your interaction with our Services and disregard any cookie-prohibitive markers or signals. NOTE, THE VENDORS THAT SUPPLY US THESE PIXELS, TAGS, WEB BEACONS, OR SIMILAR TRACKING TECHNOLOGIES COLLECT YOUR PERSONAL



INFORMATION INSTANTANEOUSLY AND SIMULTANEOUS TO OUR COLLECTION OF YOUR INFORMATION AND THEY MAY USE THE INFORMATION FOR THEIR OWN PURPOSES.

- Analytics. Our Services may also use third-party analytics tools, such as Google Analytics. You can find more information about how data is collected and processed in connection with the Google Analytics service [here](#). You can also read Google's privacy policy [here](#).

The information collected through these technologies may be combined with other personal information. We may disclose information about your use of our Services to our advertising and analytics partners, who may combine it with other information that you previously provided to them.

Identifiable information collected online or through surveys also may be combined with the information you provide to us through other sources, and the combination will be treated as discussed in this Privacy Policy. For example, if you interact with us on any social media platform, the information you make available via that social media platform may be made available to us and we may combine that information with other personal information we have collected about you. Note, social media platforms operate independently from Winland; we encourage you to review the privacy policies and settings of any social media platform with which you interact.

How We Use Information

We (or the service providers acting on our behalf) use the personal information identified above for the following purposes:

- Negotiating, entering into, and managing our business relationship and agreements with your company, including providing our products and services to and processing payments from our operational partners and customers.
- Making our Services available to individual end users.
- Providing and optimizing your experience on our Services and ensuring that our content is presented to you in the most effective manner.
- Communicating with you and responding to your inquiries, and communicating regarding our services, our agreements with your company, and other issues.
- Sending you promotional or informational communications and solicitations, tracking your marketing preferences, and for our internal marketing purposes.
- Managing customer service issues, including issues relating to the performance of our Services and customer feedback.
- Developing, updating, and improving our services, customer service, and customer experience, and otherwise improving our knowledge and insights regarding users.
- Preventing and detecting fraud, financial crime, hacking activities, security breaches, and other unlawful activities in connection with the Services or the purchase or use of our Services.
- Enforcing our agreements with you or our organizational partners and customers, complying with our legal or regulatory obligations, and defending or advancing legal claims.
- Notifying you about changes to our Services, our Terms, or material changes to this Policy.
- Providing you with surveys or otherwise soliciting feedback from you.



- Performing other functions as otherwise described to you at the time of collection or to which you otherwise consent.

We may keep and use identifiable information we collect from or about you to provide you with access to our products or services, to respond to your requests, to provide ongoing service and support, to contact you with information that might be of interest to you, to ask for your opinion about services or products, for record keeping and analytical purposes and to research, develop and improve programs, products, services, including this website.

We may use identifiable information you give us to contact you periodically by email, mail or telephone to provide information. In addition, some of the features on the website or one of our products or services may allow you to communicate with us using an online form. If your communication requests a response from us, we may send you a response via email or other communication method you select, including texts.

Finally, we may use your identifiable information to protect our rights or property, or to protect someone's health, safety or welfare, and to comply with a law or regulation, court order or other legal process.

For more information about your options relating to your personal information and your communication preferences, continue reading below.

Our Marketing Efforts

We may send you direct marketing communications from time to time including news, updates, offers, and other announcements relating to our services and business. We will only send marketing messages where the law allows us to do so and, in the event that you no longer wish to receive marketing communications from us, then you can always unsubscribe using the option provided in the communication you have received (e.g., in the footer of the email) or by contacting us using the information below.

To Whom We Disclose Your Information

We may disclose your information to third parties in the following situations or for the following purposes:

- **Service Providers and External Processing.** Your information may be shared with third party service providers, affiliates, or other trusted businesses to provide certain services we use to operate our business. For example, our service providers include (i) IT and system administration providers, (ii) data storage providers, and (iii) vendors to facilitate payments and payment processing. We may also share your information with our third-party vendors whose technologies we leverage to provide certain features in the Services. Note, the technology vendors we use to make the Services available to you via the internet or a mobile application may collect your personal information instantaneously and simultaneous with us collecting your personal information.
- **Marketing and Analytics.** We may disclose your information to marketing and advertising vendors that may assist with lead generation, hosting information relating to customers and business partners and potential customers or business partners, marketing automation, advertisement placement and targeting, and marketing campaigns and communications. Also, analytics vendors in order to understand our Services traffic and usage patterns, optimize our Services, and identify potential new customers or users.
- **Legal Process.** We may be legally compelled to release your private information in response to a court order, subpoena, search warrant, law or regulation. We may cooperate with law enforcement authorities in investigating and prosecuting Solution visitors who violate our rules or engage in behavior which is harmful to other visitors (or illegal). We also may disclose your private information to third parties if we feel that the disclosure is necessary to protect our rights or property, protect someone's health, safety or welfare, or to comply with a law or regulation, court order or other legal process.



- **Corporate Transactions.** We may disclose your personal information to buyers or other successors prior to or in the event of a merger, acquisition, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as a part of bankruptcy, liquidation, or similar proceeding, where the information is among the assets being transferred.

We may also disclose your personal information to our professional advisors, such as lawyers, accountants, and other advisors, or other parties for any purpose we disclose at the time you provide the information.

Security

We use appropriate safeguards to protect personal information from loss, misuse, alteration, or destruction. Despite these precautions, we cannot guarantee that unauthorized persons will not obtain access to your personal information, and we are not responsible or liable for the criminal acts of unrelated third parties, such as hackers. We do not warrant the security of your personal information and you provide your personal information at your own risk.

There may be links, features or tools on our website or Services, such as social media features and widgets that are hosted by a third party. We are not responsible for the performance of these sites or for your business dealings with them. Your interactions with these third party features are governed by the privacy policy of the company providing it.

Do Not Track Disclosure.

This website does not monitor for or behave differently if your computer transmits a “do not track” or similar beacon or message.

California Privacy Rights.

California Civil Code Section § 1798.83 permits users of our website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to tech.support@winland.com.

Children’s Privacy Rights.

We will not intentionally collect any private information (such as a child’s name or email address) from children under the age of 16. If you think that we have collected private information from a child under the age of 16, please contact us at 800-635-4269 or tech.support@winland.com.

EU, UK, and Switzerland Residents

The European Union’s General Data Protection Regulation and the United Kingdom’s and Switzerland’s versions of the same (collectively, the “GDPR”) afford certain rights to individuals in the European Economic Area (together with the UK and Switzerland, the “EEA”). If you are in the EEA, you have the following rights. Note, however, that not all rights apply in all circumstances.

- **Right of access:** subject to certain exceptions, you have the right of access to your personal information that we hold. If you are requesting access to your data in order to protect the rights of others, we may require you to validate your identity before we can release that information to you
- **Right to rectify your personal information:** if you discover that the information, we hold about you is inaccurate or incomplete, you have the right to have this information rectified (i.e., corrected).
- **Right to be forgotten:** you may ask us to delete information we hold about you in certain circumstances. This right is not absolute and it may not be possible for us to delete the information we hold about you, for example, if we have an ongoing contractual relationship or are required to retain information to comply with our legal obligations.



- Right to restriction of processing: in some cases, you may have the right to have the processing of your personal information restricted. For example, where you contest the accuracy of your personal information, its use may be restricted until the accuracy is verified.
- Right to object to processing: you may object to the processing of your personal information (including profiling) when it is based upon our legitimate interests. You may also object to the processing of your personal information for the purposes of direct marketing and for the purposes of statistical analysis.
- Right to data portability: you have the right to receive, move, copy, or transfer your personal information to another controller when we are processing your personal information based on consent or on a contract and the processing is carried out by automated means.

With regard to the personal information we collect from our customers and users of our Services, we are typically the "data controller" for such information under the GDPR. For our customers who are located in the European Economic Area, if you believe you may have any additional rights related to your data under the GDPR or other law, please contact us directly at 800-635-4269 or tech.support@winland.com.

This is normally free, unless this process is unduly difficult or is clearly unfounded, repetitive, or excessive, in which case we may charge a reasonable fee or decline to respond. Once we have received your request, we will review it and contact you within thirty (30) days of receipt of your request, will notify you of any delay in processing your request and, in any event, will respond to the request within three (3) months. Please note that we may need to request specific information from you to help us confirm your identity. If you are located in the EEA and have a concern about our processing of your data, you may have the right to make a complaint to the appropriate data protection authority in the EEA UK.

We will process different types of information under different lawful bases under the GDPR depending on the nature of the information and your relationship with us. The following table describes how we plan to use your personal information and our lawful basis for doing so. We may process your personal information on more than one basis depending on the specific purpose for which we have collected or are otherwise using your information.

Purpose/Activity	Type of Information	Basis of Processing
To enter into and subsequently to manage our business relationship with you including: <ul style="list-style-type: none"> • Negotiating, entering into, and performing agreements with your company • Responding to inquiries and providing customer support and service • Managing and processing transactions for our services • Notifying you about changes to our website, business terms, or this Policy • Communicating with you and responding to your 	<ul style="list-style-type: none"> • Contact Information • Transactional Information • Payment Information • Account Information • Communication Information • Customer Support Information 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to manage our business relationships and administer our operations including through the keeping of appropriate records) • Performance of a contract with you • Necessary to comply with legal obligations



Purpose/Activity	Type of Information	Basis of Processing
<p>inquiries regarding our services, agreements with your company, and other issues</p>		
<p>To administer and protect our business and Services including:</p> <ul style="list-style-type: none"> • Maintaining business records for legal purposes and to comply with tax requirements • Defending and advancing legal claims • Enforcing our rights under any agreements • Ensuring effective security for our services and website • Conducting website maintenance • Identify and address security risks and unlawful activity 	<ul style="list-style-type: none"> • Contact Information • Transactional Information • Account Information • Communication Information • Payment Information • Device and Usage Information • Customer Support Information 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (running our business, facilitating administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise) • Necessary to comply with legal obligations
<p>To make decisions about how best to deliver relevant website content and advertisements to you, and otherwise market to you, and to better understand the effectiveness of our marketing efforts</p>	<ul style="list-style-type: none"> • Marketing Information • Transactional Information • Communication Information • Device and Usage Information 	<p>Necessary for our legitimate interests (better understanding Services functionality and how Services users navigate and interact with the platform)</p>
<p>To advance and promote our business interests including contacting you regarding services or promotions that may be of interest, conducting surveys or soliciting feedback on our services, and updating, developing, and improving our services, customer service, and marketing efforts</p>	<ul style="list-style-type: none"> • Contact Information • Marketing Information • Transaction Information • Device and Usage Information 	<p>Necessary for our legitimate interests (to enhance our services, improve our marketing strategies and develop our business)</p>

If we transfer personal information from the EEA, Switzerland, or UK to the United States or any other country, we will implement appropriate legal mechanisms to ensure an adequate level of personal data protection consistent with



the GDPR's requirements. For example, if the recipient country has not received an Adequacy Decision from the European Commission (such as the United States), we will rely on Standard Contractual Clauses (SCC) that have been approved by the European Commission as the lawful mechanisms for such transfers. Further, we will enter into appropriate data processing agreements with all non-EU (sub)processors that contain SCCs and define data protection standards to be employed by each (sub)processor.

Data Storage and Retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or other mandatory reporting requirements. To determine the appropriate retention period we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure, the purposes for which we process it, whether we can achieve those purposes through other means, and the applicable legal requirements. We also consider any specific limitation periods under applicable law.

Policy Updates

We reserve the right to change this policy at any time, and will post any changes to this policy on our website as soon as they go into effect. Please refer back to this policy on a regular basis.

Updating Information

If you wish to access your information or to have your information deleted, updated, changed, or modified, you may do so by contacting us using the information below. There is an optional section of our website where input forms require your name, phone number, company, and email address. This form provides you the ability to opt in to receive future emails of any type from Winland unless you are a user of one of our products or services.

Contact Information

For further information, please contact us.

- Email: tech.support@winland.com
- Phone: 800.635.4269 Ext. 1 for Technical Support

Address:

Winland Electronics, Inc.
424 North Riverfront Drive, Suite 200
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