

Milloh CS Privacy Statement

Milloh CS is committed to compliance with privacy laws and legislation in the countries in which it operates, as well as respecting generally the privacy rights of the individuals. This privacy statement explains what personal data Milloh CS collects or otherwise processes about you, either through our direct interactions with you (e.g., as a customer or a visitor to our website) or through your interactions with an Internet site or application of one of our Customers or suppliers of products, services and operational systems (“Vendors”),

What Personal Data Does Milloh CS Collect?

Data collected through direct interactions with Milloh CS or Vendors.

Milloh CS, directly or through its Vendors’ systems, collects data from individuals with whom it interacts in person, as well as via interactions with its Internet site, online portal, Social Media and Vendors’ systems’ operational portals. This data is collected in order to operate efficiently; allow interaction to provide information regarding products and services offered by Milloh CS; protect the company’s networks, systems, data, and visitors; and to personalize our interactions to provide the best experiences with our sites and services. You provide some of this information directly, for example when using Milloh CS’s site and portals; registering for an Milloh CS or Milloh CS sponsored event, webcast, training; logging support tickets; visiting the Milloh CS booth; accessing resources (such as publications and white papers) available online; or speaking to one of our representatives. We collect other data through your interactions with our website and Vendors’ services, using technologies like cookies and methods for obtaining usage and device data.

Data is collected at your consent through your use of the site or system, or explicitly via consent requests. When asked to provide personal data, you may decline. If you decline to provide information required to obtain a product or service or access a feature, you may be unable to use that product, service, or feature.

Vendors perform business operations on Milloh CS’ behalf, such as CRM, support, sales, direct marketing, IT, or HR tasks, as well as providing the products and services which our customers buy from us. When we engage with such service providers, we seek assurances that the personal data about you was legally acquired and that we have the right to obtain such data from the service provider and to use such data for the described purpose.

The data collected depends upon the nature of your interaction with Milloh CS and the products, services, and features you use, as well as any decisions you make about providing data, including decisions through privacy settings that you may set

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on your browser or device. Categories of data collected may include the following and apply with respect to both customer representatives and non-customers:

Contact Information and Name. This data includes first and last name, email address, postal address, telephone number, company name, and similar contact data.

Login Information and Credentials. If you use any of our or Vendors' online portals, systems or communities, you may be asked to create an account and provide a login name, password, and similar security information for authentication and account access.

Employment, Job History, and Applicant Data. If you interact with Milloh CS or an online service provider used by Milloh CS to process employment applications, we collect information relating to your job history, educational history, resume, and related information used to evaluate candidates for employment with Milloh CS.

In some cases, you may provide such personal data via third-party service providers (such as job application sites or professional event coordinators) who then forward the data to Milloh CS. Such service providers perform business operations on Milloh CS's behalf, such as sales, direct marketing, IT, or HR tasks. When we engage with such service providers, we seek assurances that the personal data about you was legally acquired and that we have the right to obtain such data from the service provider and to use such data for the described purpose. We also agree to terms to ensure the protection of your personal data.

Data collected or processed through interactions with a Milloh CS customer

Milloh CS provides Vendors' content delivery and cloud security services designed to make the Internet fast, reliable, and secure for its customers. When you use the online services of one of Milloh CS's customers, Vendors will process and collect certain data about you associated with your interaction with our customer's services.

By using a customer's website or application, personal data about you may be included in the content that is sent across Vendors' network or that is stored on Vendors' servers as part of your session with the customer's website or application. We call this "End User Personal Data" and it may include login credentials; subscriber name and contact information; financial, payment, or other transaction information; or any other information relating to you as requested or provided through the use of the web services.

Milloh CS operates largely as a conduit for End User Personal Data collected, processed, and transmitted by its customers via Vendors' services. The customer

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determines what End User Personal Data is collected or otherwise used and how it will be processed by Vendors. The customer, therefore, will be responsible for compliance with applicable laws for such processing (e.g., appropriate end user notices or consents, and having chosen services appropriate for the type of End User Personal Data transiting Vendors' servers). Absent a specific customer request, Milloh CS does not store or otherwise process End User Personal Data other than as required to provide the services purchased by the customer.

Milloh CS and Vendors also collect network traffic data logged by Vendors' servers, relating to the delivery of information over the Vendors platform, as well as (when our customer has purchased the relevant services) data associated with user activity and interaction with web and Internet protocol sessions transiting Vendors' servers as part of your session with the customer's web property. We call this "Logged Personal Data," which may include the IP address used by your device, page activity data and URLs of sites you visit, country or region/city of origin based upon the IP address, and telemetry data (e.g., mouse clicks, movement rates, and user agent and related browser data).

Logged Personal Data may also be processed for purposes of billing, service issue resolution and service improvement (e.g., routing optimization), service troubleshooting, and aggregate reporting (i.e., reports that do not identify you or the customer).

Logged personal data is not collected or processed in a manner that allows Milloh CS or Vendors to positively identify you (that is, while we know your IP address, we do not know who you are or your name, address, etc.).

How Does Milloh CS Use Personal Data?

Milloh CS and Vendors use the personal data that they collect for three basic purposes:

1. Operation of our business, including providing, maintaining, developing, and improving our products and services (including identification and mitigation of security threats on the Internet);
2. Managing and supporting our relationship with our customers; and
3. Communications, including promotional communications.

These purposes are discussed in greater detail below.

Operation of our business

The data collected by Milloh CS and Vendors both through interaction with you directly and through your interactions with our customers is used to perform

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essential business operations and provide, maintain, and improve our products and services; including operating and maintaining our platform, improving performance, development of new features and capabilities, research, and customer support. Business operations uses include, for example:

Fulfillment of Transactions/Contractual Obligations. We use data to respond to requests from current and prospective customers, visitors to our site, applicants, and other interested parties.

Personalization of Your Experience on Our Sites. We use the data collected to provide you with a personalized experience on our website, communities, and portals, such as providing you with content in which you may be interested and making navigation on our sites easier. The data also is used to generate statistics about the usage and effectiveness of our sites and our service offerings, personalize your experience, and tailor our interactions with you.

Providing Support. We and Vendors use data to provide you with technical support as requested. We also use data collected to troubleshoot and identify errors in our sites, communities, and portals, as well as with our platform and services.

Product Development and Improvement. Vendors use data in the development of new products and services, and to improve and implement new features and capabilities in existing products. Logged Personal Data and other traffic data is used, for example, to derive and compile information relating to the type, nature, content, identity, behavior, signature, source, frequency, reputation, and other characteristics of malicious Internet traffic and activity.

Security. We and Vendors use data to detect and prevent potential fraud and security risks to our platform and to our visitors and customers.

Recruitment. In connection with a job application or inquiry, whether advertised on an Milloh CS site or on a third-party platform, you provide us or such third-party service providers with personal data about yourself, such as a resume and contact information. We may use this data within Milloh CS in order to address your inquiry or consider you for employment purposes. Unless you tell us not to do so, we will keep your personal data for future consideration.

Managing and supporting our customer relationships

We and Vendors use data collected about individuals representing our customers. This information is used to support our contracts and provide support for our services, provide access to customer service portals and communities, provide

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service training, communicate with customers, sell new services and features, troubleshoot issues, and other customer relationship related matters.

Communications, including promotional communications

We use data we collect to communicate with you, whether you are a visitor, prospective customer, existing customer, job applicant, or other interested party.

Promotional Communications. We use the personal data collected from your interaction with the sites to deliver marketing communications, special offers, or advertisements that may be of interest to you either directly or via third-party service providers.

You may decide not to be subject to such communications by informing us.

As part of any communications, we offer you the opportunity to choose whether or not we can use your personal data in this way. You may at any time choose not to receive marketing communications from us by following the opt-out instructions included in each email you may receive, by indicating so when we call you, or by writing to us.

Some of our offerings may be co-branded, as they are sponsored by both Milloh CS and third parties. We share data with these third parties for promotional purposes.

We encourage you to familiarize yourself with such third parties' privacy policies to gain an understanding of the manner in which they will handle personal data about you.

Customer Surveys and Service Improvements. As part of our customer relationship with you, we contact you (except in cases when you choose not to be contacted by us) via the personal data provided asking you to participate in our satisfaction surveys or in market research surveys. We use such surveys to improve our service offering and business operations to better serve you.

How Does Milloh CS Share Personal Data?

Milloh CS shares personal data with Vendors working on our behalf for the purposes described in this statement. These companies or organizations must abide by our data privacy, confidentiality, and security requirements and are prohibited from using the data for any other purposes.

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Milloh CS may share your data with your consent or as may be necessary to complete any transaction, fulfill a request, or provide you with a requested product or service either directly or through your interaction with one of our customers.

Milloh CS will share, transfer, access, disclose, and preserve personal data to the extent required, in our discretion, that such is necessary for:

Protection of the Rights and Property of Milloh CS and Others. We use and share the personal data you provide to protect the rights or property of Milloh CS, our business partners, third-party service providers, customers, or others when we have reasonable grounds to believe that such rights or property have been or could be affected.

Compliance with Applicable Law. We use and share personal data as required to comply with applicable law or regulation, respond to proper law enforcement requests or other valid legal process, or to comply with applicable government reporting obligations.

Corporate Transactions. Circumstances may arise where, whether for strategic or other business reasons, Milloh CS decides to sell, buy, merge, or otherwise reorganize its business. In such cases, we may share the personal data collected within Milloh CS, with Milloh CS third-party service providers, or other third parties as reasonable to proceed with the negotiation or completion of a merger, acquisition, sale, or other corporate transaction.

In all cases, Milloh CS will seek reasonably appropriate protections for your personal data when sharing it with third parties and we share it only if the recipient agrees to comply with this privacy statement or has in place substantially similar privacy policies regarding the treatment of personal data and only after execution of a data protection agreement or a non-disclosure agreement.

Where Does Milloh CS Process Personal Data?

Milloh CS operates in several countries and some Vendors are global organization with business processes, management structures, and technical systems that cross borders. As such, we share the personal data within Milloh CS and with our business partners, third-party service providers, and other third parties, and therefore transfer your personal data to countries in the world where we do business or operate our systems.

Safeguards for Transfer. For any transfer of personal data outside the European Economic Area to a country which is deemed by the EU to have an inadequate level of data protection, Milloh CS has put in place with its third-party service providers, and with its customers, the necessary safeguards and mechanisms to

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ensure that such transfers comply with applicable data protection laws. These safeguards include the [EU Standard Contractual Clause](#) and Vendors' EU-U.S. and U.S. – Swiss Privacy Shield certifications. In addition, Milloh CS may institute in the future in its discretion other lawfully approved mechanisms such as Binding Corporate Rules and Codes of Conduct. For transfers to third-party service providers, Milloh CS shall ensure that such entity maintains appropriate safeguards and shall have in place required data protection terms to ensure protection of personal data to the same degree as required of Milloh CS.

Milloh CS's Legal Basis for Processing of Personal Data

As discussed above, Milloh CS processes personal data for a number of reasons. In all cases, Milloh CS ensures that such processing is legal, fair, and reasonable. The various processing activities are justified by varying legal bases under the GDPR and similar laws.

Data Processed for Promotional Communications. In those cases where data is collected in order to provide promotional materials or communications, Milloh CS's processing is based upon the consent of the individual.

Data Processed to Provide a Service, Feature, or Functionality of a Website or Portal. In those cases where you are accessing or using a feature or service provided by Milloh CS or Vendors, the basis for Milloh CS's processing is either to provide a service requested by you or, when consent is requested on the website or portal, your consent.

Processing of Logged and End User Personal Data. Where Logged Personal Data is processed in order to provide, improve, and develop services and functionality, the legal basis for such processing is Milloh CS' and Vendors' legitimate interest in providing services to its customers, and improving and developing service to support its business objectives and provide benefit to its customers and Internet end users. In the case of End User Personal Data processed as a result of your interaction with a customer website or service, Milloh CS and Vendors will process such data on behalf of that customer subject to its instruction, and the legal basis for such processing will be determined by the customer.

Data Processed to Support Milloh CS Necessary Business Operations. Where Milloh CS and Vendors process personal data in order to support necessary business operations such as site operations and security, recruitment, site and service analytics, relationship management, and global operations, Milloh CS and Vendors process such data pursuant to its legitimate interest in maintaining viable and efficient business operations and support of necessary business functions (e.g., HR, Finance, etc.).

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In all cases of data processing, Milloh CS considers the impact on the rights and freedoms of the individuals whose data may be part of the processing, and ensures that its processing activities do not contradict or place at unreasonable risk any such rights or freedoms.

How Does Milloh CS Secure Personal Data?

Milloh CS and Vendors maintain administrative, technical, organizational, and physical measures designed, taking into account the nature of the data and the processing, the state of the art, the costs of implementation, and the potential for impact to the rights and freedoms of individuals whose data is being processed, to protect personal data in accordance with this statement and applicable laws against loss, and unauthorized access, use, alteration, and disclosure. Such measures include, by way of example, encryption in transit, two-factor authentication, and strict access controls. We also require that our third-party service providers protect personal data against unauthorized access, use, and disclosure as required under applicable laws.

How Long Do Milloh CS and Vendors Retain Personal Data?

The retention of personal data collected depends on the purpose it has been collected for and the systems used to process the data. For example, we will retain your account data for our sites and communities for as long as your account is active. With respect to Logged Personal Data collected as a result of your interactions with a customer's website or services, Milloh CS and Vendors will retain such personal data generally for no more than 90 to 100 days, and often for a shorter period than that. Similarly, customer data will be retained as long as required for the customer relationship. Please note that where applicable we will retain and use your personal data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Cookies, Web Beacons, and Other Technologies

As discussed above, we and Vendors collect information from your visits to our sites, communities, and portals, and your interactions with our customer service offerings, in order to help us gather statistics about usage and effectiveness; personalize your experience; tailor our interactions with you; and provide, develop, and improve our services. We do so through the processing of transaction logs, as well as the use of various technologies, including scripts, tags, Local Shared Objects (Flash cookies), Local Storage (HTML5) beacons, and cookies. A cookie is a piece of data that a website can send to your browser, which may then be stored on your computer as a tag that identifies your computer. While cookies are often only used to measure website usage (such as number of visitors and duration

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of visit) and effectiveness (such as topics visitors are most interested in) and to allow for ease of navigation or use and, as such, are not associated with any personal information, they are also used at times to personalize a known visitor's experience to a website by being associated with profile information or user preferences. Over time, this information provides valuable insight to help improve the user experience.

Cookies are typically categorized as "session" cookies or "persistent" cookies. Session cookies help you navigate through websites efficiently, keeping track of your progression from page to page so that you are not asked for information you have already provided during the current visit. Session cookies are stored in temporary memory and erased when the web browser is closed. Persistent cookies, on the other hand, store user preferences for current and successive visits. They are written on your device's hard disk, and are still valid when you restart your browser. We use session cookies, for example, for media performance analytics. We use persistent cookies, for example, to record your choice of language and country location.

You can opt out of the usage of tracking tools on sites by clicking on the "Consent Preferences" link either in the cookie banner or in the footer of the website under the header "Resources".

In addition, you can generally express your privacy preferences regarding the use of most cookies and similar technologies through your web browser. Look under the heading "tools" (or similar heading) in your particular browser for information about controlling cookies. You can set your browser in most instances to notify you before you receive a cookie, giving you the chance to decide whether to accept it or not. You can also generally set your browser to turn off cookies.

Since cookies allow you to take advantage of some of our sites' features or features of our service offerings and services, we recommend that you leave them turned on. If you block, turn off, or otherwise reject our cookies, some web pages may not display properly, or you will not be able to proceed to checkout, for instance. Some sites, service offerings, and services may also use web beacons or other technologies to provide better customer service. These technologies may be in use on a number of pages across the sites. When you as a visitor access these sites, a non-identifiable notice of that visit is generated, which may be processed by us or by our third-party service providers. These web beacons usually work in conjunction with cookies. If you don't want your cookie information to be associated with your visits to these sites or use of these services, you can set your browser to turn off cookies. If you turn off cookies, web beacon and other technologies will still detect visits to these sites; however, they will not be associated with information otherwise stored in cookies.

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Many Milloh CS and Vendors services that you interact with via our customer services also use session and persistent cookies in order to provide the service functionality. Examples of the purposes for use of various cookies include determining whether a given interaction is with a human or a “bot,” identifying attempts to bypass security settings, identifying devices that already have been authenticated, and similar necessary service functions.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that if you do this you may not be able to use the full functionality of our websites or benefit fully from the capabilities of services used by our customers.

We use Local Shared Objects, such as Flash cookies, and Local Storage, such as HTML5, to store content information and preferences. Third parties with whom we partner to provide certain features on our website or to display Milloh CS advertising on others’ websites based upon your web browsing activity also use Flash cookies or HTML5 to collect and store information. Various browsers may offer their own management tools for removing HTML5.

To manage Flash cookies, please visit http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html.

We may also include web beacons in marketing email messages or our newsletters in order to determine whether messages have been opened and links contained within have been clicked on.

Some of our business partners set web beacons and cookies on Milloh CS’ and Vendors’ websites, communities, and mobile applications:

Google Analytics. We and Vendors use Google Analytics for our sites, a web analysis service of Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; “Google”). The use includes the “Universal Analytics” operating mode. This facilitates the assignment of data, sessions, and interactions across several devices to a pseudonymous user ID and thus the analysis of a user’s activities across devices. Google Analytics uses cookies. The information generated by the cookie about your use of the site is usually transferred to a Google server in the USA and stored there. In case you are a EU citizen, and in case IP anonymisation is activated on the site, Google will shorten your IP address before it is transferred to Google servers in the USA. Only in exceptional cases will your complete IP address be transferred to the USA and shortened there. The IP address transferred by your browser will not be merged with other data Google holds. On our behalf Google will use your data for analytics relating to your use of

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the site, to compile reports on the site activity, and to provide us with other services related to website and Internet use.

For more information on Google's terms of use, please visit <https://www.google.com/analytics/terms/us.html>. Its Google Analytics privacy statement is available at <https://policies.google.com/privacy/partners>.

You may also prevent Google from collecting the data generated by the cookie and relating to your use of the website (including your IP address) and from processing this data by downloading and installing the Google Analytics Opt-out Browser Add-on, available here: <https://tools.google.com/dlpage/gaoptout?hl=en>. Opt-out cookies prevent the future collection of your data when you visit the site. To prevent Google Universal Analytics from collecting data across several devices, you must opt out on all systems used.

Third-Party Social Media Widgets. In addition, third-party social media widgets (e.g., Facebook's "Share" or "Like" button), the playing of videos embedded on our and Vendors' sites and operated by third-party video-sharing providers (e.g., YouTube), and surveys linked to from our sites and operated by third-party providers (e.g., SurveyMonkey), may log certain information such as your IP address, browser type and language, access time, and referring website addresses, and, if you are logged in to those social media sites, they may also link such collected information with profile information they may have about you. We do not control these third-party tracking technologies. Please make yourself familiar with these third-party web beacons and cookies usage and read their privacy statements to understand their data collection practices and the choices offered to you (e.g., for YouTube, <https://policies.google.com/privacy?hl=en>).

Depending upon your privacy settings with the social media service providers, we may be able to collect information from your profile set up for their social media services when you interact with the widgets.

We may include applications (or "widgets") from third-party social media offerings that allow you to follow or interact with us on social media platforms. These widgets, such as a Facebook "Share" or "Like" button, are visible to you on the web page you visit. When you use these widgets or when you are logged into those platforms, the respective social media providers may be able to collect information about your use of the sites. Please view the applicable social media network's privacy policy to better understand their data collection practices and choices they make available to you. The privacy policy of the social media network controls the collection, use, and disclosure of all personal information transmitted to that network.

Online Advertisement

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Milloh CS does not deliver third-party online advertisements on our sites, but we advertise our services on third parties' websites.

Please familiarize yourself with those website operators' or network advertisers' privacy policies to understand their practices relating to advertising, including what type of information they may collect about your Internet usage. Some advertising networks we may use may be members of the Network Advertising Initiative (NAI) or the European Interactive Digital Advertising Alliance (EDAA). Individuals may opt out of targeted advertising delivered by NAI or EDAA member ad networks by visiting <http://www.networkadvertising.org> and <http://www.youronlinechoices.eu/>.

We have also engaged with certain third parties to manage some of our advertising on other sites. These third parties use cookies and web beacons to collect information (such as your IP address) about your activities on Milloh CS's and others' websites to provide you targeted Milloh CS advertisements based upon your interests ("Remarketing"). When performing their remarketing services, the third parties are acting as independent controllers. Details about their tools to provide targeted advertisements are available on such third party's websites. E.g. for Facebook Pixel, the respective operation model used by Facebook Inc. at <https://www.facebook.com/business/help/651294705016616>. For Google Adwords, the respective operation model used by Google, <https://policies.google.com/technologies/ads..>

If you wish to not have your information used for the purpose of serving you targeted advertisements, you can opt out of the respective cookies used by such third party providers on the "Consent Preference" page, <https://www.MillohCS.com/uk/en/privacypolicies/opt-out-tracking.jsp>.

You can also disable cookies in general via your browser or via specific sites as described above in the "[Cookies, Web Beacons, and other Technologies](#)" section of this statement.

Please note that opting out for the respective cookies does not opt you out of being served non-targeted advertising. You will continue to receive generic, non-targeted advertisements.

Links to Third-Party Websites and Third-Party Applications

To allow you to interact with other websites on which you may have accounts (such as Facebook and other social media service providers) or join communities on such sites, we may provide links or embed third-party applications that allow you to log in, post content, or join communities from our sites. We may also provide you with general links to third-party websites.

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Your use of these links and applications is subject to the third parties' privacy policies, and you should become familiar with these third-party sites' privacy policies before using the links or applications. Milloh CS is not responsible for the privacy practices or the content of those other third-party websites.

How to Contact Us

If you have a question about this statement or Milloh CS's handling of your personal data, or if you wish to provide instructions regarding our use of your data as set forth in this statement, you may contact us:

By sending an email to admin@Milloh-CS.com

Your Rights as a Data Subject:

You have the right to request access to and rectification or erasure of personal data or restriction of processing concerning the data subject and to object to processing as well as the right to data portability. You also have the right to withdraw any consent that you may have given for the processing of personal data.

Please note that before Milloh CS is able to provide you with any access to information, correct any inaccuracies, or delete your personal data, we may ask you to verify your identity and to provide other details to help us to respond to your request. We will contact you within 30 days of your request.

Note Regarding Logged Personal Data. As discussed above, Milloh CS does not process or maintain Logged Personal Data (e.g., IP addresses) in a manner that allows us to positively identify any individual. We process such data from the point of view of identifying activities on the Internet and our customers' sites and identifying IP addresses and devices that may be the source of malicious or harmful activity. In addition, we do not collect additional information in order to positively identify any individual. Therefore, absent detailed and verifiable proof that a given IP address from any person requesting access to Logged Personal Data that may relate to them was actually assigned to the requestor during the time period of the request, we likely will not be able to provide any data in response to the request. If such verifiable and detailed information is available, Milloh CS will work with the requestor to determine if the request can reasonably be met.

How to Report a Concern

You may report any concerns you have regarding our processing activities of personal data by email to admin@milloh-cs.com.