

# Privacy Policy

*Last revised on May 26, 2016*

Xecurify ("Us," "We," "Our," "Xecurify," or the "Company") is committed to protecting the privacy of your information while using our website, including, but not limited to <https://miniorange.com>. We've crafted the policy below to help you understand how xecurify collects and uses personally identifiable information. The Company encourages you to review the privacy statements of other Web sites to understand their information practices.

## 1. Introduction

We protect your personal information using industry-standard safeguards. We may share your information only with your consent or as required by law as detailed in this policy, and we will always let you know when we make significant changes to this Privacy Policy.

Maintaining your trust is our top priority, so we adhere to the following principles to protect your privacy:

- We protect your personal information and will only provide it to third parties: (1) with your consent; (2) where it is necessary to carry out your instructions; (3) as reasonably necessary in order to provide our features and functionality to you; (4) when we reasonably believe it is required by law, subpoena or other legal process; or (5) as necessary to enforce our User Agreement or protect the rights, property, or safety of Xecurify, its Customers and Users, and the public.
- We have implemented appropriate security safeguards designed to protect your information in accordance with industry standards.

This Privacy Policy applies to miniorange.com, login.xecurify.com and the mobile applications associated with Xecurify, Xecurify platform technology and all other Xecurify websites, apps, developer platforms and other products and services (collectively "Xecurify" or the "Services").

Xecurify's Web sites may contain links to other Web sites. Xecurify is not responsible for the information practices or the content of such other Web sites.

## **2. Information**

### **2.1 What information we collect**

Our Privacy Policy applies to any Customer or User. If you live in the U.S., Xecurify Inc controls your information.

If you reside in the United States, then the personal information provided to or gathered by Xecurify is controlled by Xecurify Inc, 105 N 1<sup>ST</sup> ST Suite, 429 San Jose, CA 95103-3005. If you have any concern about providing information to us or having such information displayed on the Xecurify services or otherwise used in any manner permitted in this Privacy Policy and the User Agreement (together also referred to as Xecurify's Terms of Service), you should not become a Customer of Xecurify, visit our websites, apps or otherwise use our Services. If you have already registered, you can close your account by sending an email to [info@xecurify.com](mailto:info@xecurify.com).

We collect your personal information in the following ways:

- When you create an account with us, you provide us with information (including your name, email address, phone number and password) that we use to offer you a personalized, relevant experience on Xecurify.
- When you contact our Customer Support, personal contact information, such as name, company name, address, phone number, email address, and any other information necessary for us to provide Visitors with access to the various aspects of the Services. The Personal Information you provided is used for such purposes as answering questions, improving the content of the website, customizing the content, and communicating with the Visitors about Xecurify's Services, including specials and new features.
- When you contact our customer support services, we collect information that helps us categorize your question, respond to it, and, if applicable, investigate any breach of our User Agreement or this Privacy Policy. We also use this information to track potential problems and trends and customize our support responses to better serve you.

- We and our third party utility-tracking partners gather certain information automatically and store it in log files. This information includes Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, operating system and date/time stamp.
- When your user profile is created by or at the request of a Customer of which you are an employee, contractor, member, agent or other participant your employer may provide us with certain Personal Information, such as your name, email address, and telephone number. Please refer to Section 4.2 for more details.
- We also collect device-specific information (e.g. mobile and desktop) from you in order to provide the Services. Device-specific information includes attributes (e.g. hardware model, operating system, web browser version, as well as unique device identifiers), connection information (e.g. name of your mobile operator or ISP, browser type, language and time zone, and mobile phone number); and device locations (e.g. internet protocol addresses and Wi-Fi). We may need to associate your device-specific information with your Personal Information on a periodic basis in order to confirm you as a user and to check the security on your device.

We do not collect email address from Xecurify production service for marketing use. We do not collect information from individuals (“Visitors”) who visit the Xecurify Website. As Visitors navigate or interact with Xecurify’s website, Xecurify may also automatically collect information through the use of commonly-used information-gathering tools, such as cookies or as provided in Section 2.2.

We are constantly innovating to improve our Services, which means we may create new ways to collect information on the Services.

Xecurify is a dynamic, innovative environment, which means we are always seeking to improve the services we offer you. We often introduce new features, some of which may result in the collection of new information (for example, when the ‘Forgot Phone’ feature launched, we began collecting information about alternate emails and life questions etc.) Furthermore, new partnerships or corporate acquisitions may result in new features, and we may potentially collect new types of information.

## **2.2 Third-party Service Providers**

Xecurify employs third parties to help us with the Services.

We use some third party services. These services may place cookies on your device to gather, for example usage information and session preferences. These cookies help us understand how visitors interact with our websites by providing information about the areas visited, the time spent on the website, and any issues encountered, such as error messages. This helps us improve the performance of our websites. We

do not have control over the cookies these services may set in order to make their service run properly or the cookies they may set to collect usage and preferences.

Xecurify may also employ third party companies and individuals to facilitate our Services (maintenance, analysis, audit, marketing and development). These third parties have limited access to your information only to perform these tasks on our behalf and are obligated to Xecurify not to disclose or use it for other purposes.

Xecurify uses a third party intermediary to perform credit card processing when registering for the paid plans of the Service. This Privacy Policy does not cover information collected by this intermediary and Xecurify is not covered by, or responsible for, the intermediary's privacy practices or policy.

Xecurify may also transmit personal information to its third party vendors and the hosting partners that provide the necessary hardware, software, networking, storage, and other technology and maintenance services required to operate and maintain the Web site and the Service. This may require that your personal information be transferred from Your current location to the offices and servers of Xecurify and these authorized third parties.

## **2.3 Customer Testimonials/Comments/Reviews**

We post customer testimonials/comments/reviews on our web site which may contain personally identifiable information. If you wish to update or delete your testimonial, you can contact us at [info@xecurify.com](mailto:info@xecurify.com).

## **2.4 How we use your personal information**

When you register with Xecurify, you acknowledge that information you provide on your profile used by us as described in this Privacy Policy and our User Agreement.

The personal information you provide to us may reveal or allow others to identify aspects of your life that are not expressly stated on your profile (for example, your name may reveal your gender). By providing personal information to us when you create or update your account, you are expressly and voluntarily accepting the terms and conditions of Xecurify's User Agreement and freely accepting and agreeing to our processing of your personal information in ways set out by this Privacy Policy. Supplying to us any information deemed "sensitive" by applicable law is entirely voluntary on your part. You have the right to withdraw or modify your consent to Xecurify's collection and processing of the information you provide at any time, in accordance with the terms of this Privacy Policy and the User Agreement, by changing your account settings on Xecurify or by closing your respective account.

We communicate with you through email, notices posted on the Xecurify websites or apps, and other means available through the Services, including mobile text messages and push notifications. Examples of these communications include: (1) welcome and engagement communications - informing you about how to best use Xecurify, new features, etc.; (2) service communications; these will cover service availability, security, and other issues about the functioning of Xecurify. Please be aware that you cannot opt out of receiving service messages from Xecurify.

We use the information you provide on your profile to customize your experience on Xecurify.

We may share your personal information with our Xecurify affiliates (meaning entities controlled by, controlling or under common control with Xecurify) outside of the Xecurify entity that is your data controller as necessary to provide the Services. By agreeing to this Privacy Policy, you are consenting to this sharing.

Except as described in the policy, Xecurify will not give, sell, rent, or loan any identifiable Personal Information to any third party, without a Visitor's prior consent, unless required by law.

## **2.5 Compliance with Legal Process and Other Disclosures**

We may disclose your personal information if compelled by law, subpoena, or other legal process, or if necessary to enforce our User Agreement or to establish or exercise their legal rights or defend against legal claims.

It is possible that we may need to disclose personal information, profile information, or information about your activities as a Customer or User when required by law, subpoena, or other legal process, or if Xecurify has a good faith belief that disclosure is reasonably necessary to (1) investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies; (2) enforce the User Agreement, investigate and defend ourselves against any third-party claims or allegations, or protect the security or integrity of our Service; or (3) exercise or protect the rights, property, or safety of Xecurify, our Customers, personnel, or others. We attempt to notify Customers about legal demands for their data when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency.

Xecurify may also provide non-personal, summary or group statistics about our customers, sales, traffic patterns, and related Services information to reputable third-party vendors, but these statistics will include no Personal Information.

## **2.6 Disclosures to Others as the Result of a Change in Control or Sale of Xecurify Corporation**

If there is a change in control or sale of all or part of Xecurify, we may share your information with a third party, who will have the right to use that information in line with this Privacy Policy.

We may also disclose your personal information to a third party as part of a sale of the assets of Xecurify Corporation, a subsidiary, or division, or as the result of a change in control of the company or one of its affiliates, or in preparation for any of these events. Any third party to which Xecurify transfers or sells Xecurify's assets will have the right to continue to use the personal and other information that you provide to us in the manner set out in this Privacy Policy.

## **3. Your Choices & Obligations**

### **3.1 Rights to Access, Correct, or Delete Your Information, and Closing Your Account**

You can change your Xecurify information at any time by editing your account, or by closing your account. You can also ask us for additional information we may have about your account.

You have a right to (1) access, modify, correct, or delete your personal information controlled by Xecurify regarding your account, and (2) close your account. You can also contact us for any account information which is not readily accessible to you.

### **3.2 Your Obligations**

Please respect the terms of our User Agreement and our Policies.

As a Customer, you have certain obligations. Some of these obligations are imposed by applicable law and regulations and others have been introduced for the benefit of Customers:

- You must, at all times, abide by the terms and conditions of the current Privacy Policy, User Agreement, and other policies of Xecurify. This includes respecting all intellectual property rights that may belong to third parties, such as trademarks or copyrights.
- You must keep your information updated to prevent getting locked out of Xecurify in case you forget your password.

Any violation of these guidelines or those detailed in our User Agreement or elsewhere may lead to the restriction, suspension, or termination of your account at the sole discretion of Xecurify.

## **4. Important Information**

### **4.1 Minimum Age**

You have to meet Xecurify's minimum age requirements to create an account.

As described in Section 2.3 of the User Agreement, persons must be of Minimum Age to use Xecurify.

### **4.2 Information Collected on Behalf of our Customers using the Service**

Xecurify collects information under the direction of its customers and has no direct relationship with the individual Users/employees whose personal data it processes. Xecurify works with its customers to help them provide notice to their employees concerning the purpose for which personal information is collected.

We collect information for our customers. If you are an employee of one of our customers and would no longer like to use Xecurify's service, please contact your Employer directly. Xecurify may transfer Personal Information to companies that help us provide our service. Transfers to subsequent third parties are covered by the provisions in this Policy regarding notice and choice and the service agreements with our Customers.

Xecurify has no direct relationship with the individuals whose Personal Information it processes. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data should direct their query to their Employer. If the Employer/ Xecurify's Customer

requests that Xecurify remove the data, we will respond to their request within 30 business days.

Xecurify will retain Personal Information we process on behalf of our customers for as long as needed to provide services to our customer. Xecurify will retain and use this Personal Information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## **5. Security**

Xecurify maintains and uses reasonable administrative, organizational, technical and physical safeguards to protect your information from loss, destruction, misuse, unauthorized access or disclosure as required by applicable law. These technologies help ensure that your data is safe, secure, and only available to you and to those you provided authorized access (e.g., your users). For example, when you enter confidential information (such as login credentials or information submitted from within the Service), we encrypt the transmission of that information using secure socket layer technology (SSL). SSL technology is designed to prevent you from inadvertently revealing personal information using an insecure connection. However, since the Internet is not a 100% secure environment, we cannot ensure or warrant the security of any information that you transmit to Xecurify. There is no guarantee that information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. It is your responsibility to protect the security of your login information. Please help keep your account safe by using a combination of or individual use of strong password, 2-factor authentication and fraud prevention.

### **5.1 Practices**

Xecurify is committed to secure and authorized access of user's information and its website's resources. Xecurify takes reasonable steps to maintain and secure its technologies and information from potential threats. Xecurify protects sensitive information by the secure method of password hashing. Xecurify conducts timely tests to safeguard and protect the website and user's information. Here are a few vulnerability issues addressed in these tests

- a. HTTP response header injection
- b. SQL injection
- c. Cleartext submission of password
- d. Cross-site request forgery
- e. Cross-site scripting



- f. PHP code injection
- g. SSL cookie without secure flag set
- h. Referrer-dependent response
- i. Frameable response (potential Clickjacking)
- j. Content type incorrectly stated
- k. Email addresses disclosed

## **6. Changes to this Privacy Policy**

We will notify you when we change this Privacy Policy.

We may change this Privacy Policy from time to time. If we make significant changes in the way we treat your personal information, or to the Privacy Policy, we will provide notice by posting an announcement on the Website or sending an email prior to the change becoming effective. Please review the changes carefully. If you agree to the changes, simply continue to use our Services. The only remedy, if you object to any of the changes to our terms and you no longer wish to use Xecurify, is to close your account(s). Unless stated otherwise, our current Privacy Policy applies to all information that Xecurify has about you and your account and your users. Using Xecurify after a notice of changes has been communicated to you or published on our Services shall constitute consent to the changed terms or practices.

## **7. How To Contact Us**

If you have questions or comments about this Privacy Policy, please contact us [online](#) or by physical mail at:

**For Members in the United States:**

*Xecurify Inc*

*105 N 1<sup>ST</sup> ST*

*Suite 429*

*SAN JOSE, CA*

*95103-3005*