

Privacy Policy

Last Updated/Effective Date: Jun 27, 2023

Privacy Policy Overview

This Privacy Policy (this “Policy”) outlines the privacy practices of InRule Technology, Inc. and its subsidiary partners simMachines, Inc. and InRule AB (collectively “InRule”, “us” or “we”). We are committed to protecting your privacy. Please read the following to learn what personal information we collect about you and how we use it. If you have any questions about our Privacy Policy, please email us at info@inrule.com.

This Policy describes how InRule collects and uses personal information about you when you:

- Visit and use our websites located at inrule.com, barium.se, simmachines.com, and their associated webpages (collectively, the “Websites”);
- Purchase and use our products (“Products”) and services (“Services”); and
- Correspond or otherwise communicate with us.

This Policy also addresses rights you may have under the California Consumer Privacy Act and the General Data Protection Regulation and other applicable data protection laws.

To provide some background, we are a data processor that processes personal information primarily on behalf of and in accordance with the instructions of our customers (the data controllers). Our customers collect such personal information from their data subjects using our Products and Services, and such information is automatically stored on servers that are under our or our hosting provider’s control. Our data processing activities are limited to the minimum necessary for performance of the contracts between us and our customers. For more information regarding how a data subject’s information is processed, please refer to the applicable customer’s privacy policy.

How We Collect Personal Information

We collect personal information in the following ways:

- **From you**, such as when you visit or use our Websites, purchase our Products or Services, use our products, contact us, fill out a form or survey, or sign up for emails or marketing;
- **From third parties**, such as service providers that we use, analytics and data companies, social media platforms, advertising networks and cooperatives, and other third parties that we choose to collaborate or work with; and
- **Automatically by cookies and similar technologies**. For example, we and third parties we work with may collect information from the device that you use to access our Websites and products, or that you use to open an email or click on an advertisement from us. For more information on our use of cookies, location-identifying technologies, and similar technologies (collectively, “tracking technologies”), please review the “Cookies and Related Technologies” section.

What Personal Information We Collect

We collect and obtain a variety of types of personal information, including:

- **Contact information**, such as your name, email address, job title, and company address and phone number;



- **Purchase information**, such as the Products and Services you purchase, your credit card or other payment information, and your billing and shipping address;
- **Preference information**, such as your contact and marketing preferences;
- **Account information**, which may include your account username and password, and other information about your account;
- **User-generated information**, such as the content you submit in form fields on our Websites;
- **Correspondence information**, including information about your email or other communications with us, and information that you share in such communications with us;
- **Call recordings and voicemail message transcripts** including information about your call and information you share when you call us on the phone or leave us a voicemail; and
- **Device and browsing information**, including information about your phone, tablet, computer, or other device, and online browsing activity. This may include your IP addresses, countries of origin, unique device identifiers, cookie identifiers, device and browser settings and information, and Internet service provider information. This may also include information about when and how you access and use our Websites, such as the date and time of your visit or use, the websites you visit before coming to and after leaving our Websites, how you navigate and what you search for using our Websites, and the website pages and items you view using our Websites.

How We Use Personal Information

We use the personal information that we collect and obtain to conduct our business and to provide you with our Products, and Services, and experiences that you request or that we think may be of interest to you. We also may combine any or all of the information that we collect or obtain with other information that we collect or obtain, including but not limited to information obtained from third parties with which we choose to work. We use information:

- **To provide you with our Products and Services**, to process, maintain, and service your account, and to provide you with our Products and Services that you request or that we think may be of interest to you;
- **To respond to you**, when you contact us through our Websites, correspond with us by email, or otherwise communicate with us, complete a form or survey, make a request or inquiry, or share a comment or concern;
- **For personalization of your experiences with us**, including to remember your interests and preferences, to personalize Website content, to customize the Products and Services, to track and categorize your activity and interests on our Websites (including by identifying the different devices you use), and to enrich your experience and on our Websites;
- **For marketing and advertising**, including sending you marketing and advertising communications, to segment and build audiences and engage in interest-based advertising, and to personalize the marketing and advertising that we show you (for choices about marketing and advertising, see the “Your Choices” section below);
- **For analytics**, including to understand how you use our Websites, to analyze our Websites’ traffic, to determine the methods and devices used to access our Websites, and to improve our Websites, Products and Services;
- **For our business purposes**, including to operate and improve upon our business and lawful business activities, to maintain our accounts and records, for research, to determine your satisfaction with our Products and Services, to deliver the agreed service level of our Products, to perform necessary processing activities to maintain our Products’ performance and to protect the integrity of the Services, e.g. to detect and prevent fraud or misuse of our Services; to enforce,



apply, or comply with any of our terms or policies, including but not limited to this Policy, and for any other business purpose that is permitted by law;

- **For legal, contractual and safety purposes**, including to defend or protect us, our customers, you, or third parties from harm or in legal proceedings, to protect our rights, to protect our security and the security of our customers, employees, and property, to respond to court orders, lawsuits, subpoenas, and government requests, to address legal and regulatory compliance, to verify your identity or communications from you, to comply with contracts and other agreements to which we are a party, and to notify you of changes to our terms, policies, or practices.

How We Disclose Personal Information

We may disclose personal information to:

- **Affiliates.** We may disclose personal information with our affiliates for their internal and business purposes.
- **Third parties and service providers** that provide products or services to us (*e.g.*, payment processing), that help us market or advertise to you (including co-branded/reseller marketing and advertising), including our advertising and analytics partners. We may use third parties or service providers to perform any of the actions or activities described in this Policy;
- **Social media platforms and networks**, that offer functionalities, plugins, widgets, or tools in connection with our Websites (*e.g.*, to disclose purchases and other content from our Websites with your followers on social media). If you choose to use these functionalities, plugins, widgets, or tools, certain information will be disclosed with or collected by those social media companies. For more information about what information is disclosed or collected, and how it is used, and information about privacy settings on those social media platforms, please see the applicable social media company's privacy policy;
- **Parties to business transactions**, such as those we deal with in mergers, acquisitions, joint ventures, sales of assets, reorganizations, divestitures, dissolutions, bankruptcies, liquidations, or other types of business transactions. In these types of transactions, personal information may be disclosed, sold, or transferred, and it may be used subsequently by a third party; and
- **Additional third parties**, such as law enforcement, government entities, courts, our legal advisors, or other third parties as required or allowed by applicable law, such as for the legal and safety purposes described under the "How We Use Personal Information" section above, or otherwise to help prevent harm or fraud to us, you, our customers, or other third parties. We also may disclose personal information with third parties upon your request or with your consent, although we may not be able to accommodate all requests.
- **Other.** We may disclose personal information with third parties and/or service providers when explicitly requested by or consented to by you, or for the purposes for which you disclosed the personal information to us as indicated at the time and point of the disclosure (or as was obvious at the time and point of disclosure).

Cookies and Related Technologies

We provide a variety of services on our Websites using cookies, a small piece of data that a website can send to your browser, which may then be stored as a "tag" that identifies your computer. Cookies serve a variety of functions, including to help navigate Websites, provide secure connections, gather statistics about website usage, and store and recall user preferences.



We use third-party services for web analytics and interest-based advertising. These service providers and advertising partners may use cookies and other tracking technologies to collect information about you when you use the Websites, open our emails, or interact with our advertisements.

For example, we use Google Analytics to help us analyze how visitors use our Websites. The information from Google Analytics cookies, including your IP address, is transmitted to Google. This information is then used to evaluate visitors' use of the Websites and to compile statistical reports on Website activity for us. Google's ability to use and share information collected by Google Analytics about your visits to the Site is restricted by Google's [Terms of Service](#) and [Privacy Policy](#). If you do not want any information to be collected and used by Google Analytics, you can install an opt-out in your web browser. Click [here](#) if you would like to learn more about the Google Analytics opt-out browser add-on, and click [here](#) to install the opt-out browser add-on.

Your Choices

You have choices about how certain personal information is used and disclosed. Your choices include:

- **Providing Information.** Depending on the purpose, some personal information we ask you to provide is required and some voluntary. If you do not provide certain information, you may not be able to use certain features of our Website, Products, or Services.
- **Emails.** You can opt-out of receiving future promotional email messages from InRule by following the opt-out instructions provided in any such message you receive or by visiting [this page](#). Please note that it may take up to ten (10) days to process your request. Please also be aware that we may continue to send you transactional, administrative, and marketing communications, such as emails confirming your transactions with us, and notices regarding changes to our Terms of Use and this Policy.
- **Cookies.** Most web browsers automatically accept cookies, but you can change your browser's settings to disable all or certain cookies. For more information on how to manage browser cookies, see <http://www.allaboutcookies.org>. Please note that by disabling or deleting cookies, you may not be able to access the full functionality of our Websites. Disabling or clearing cookies also may affect cookie-based opt-outs by either preventing you from using such cookie-based opt-outs or clearing opt-outs that you previously set. Some browsers have a "Do Not Track" (DNT) setting that sends a signal to the websites you visit indicating that you do not wish to be tracked. We currently do not respond to such DNT signals.
- **Online Advertising.** You may control your advertising preferences or opt-out of certain Google advertising products by visiting the Google Ads Preferences Manager, currently available at <https://google.com/ads/preferences> or by visiting NAI's online resources at <http://www.networkadvertising.org/choices>. You also can learn more about opting out of third parties' use of cookies used to tailor ads and other content to you by visiting http://www.networkadvertising.org/managing/opt_out.asp and <http://www.aboutads.info/choices>.

Security and Retention

Although we take reasonable steps to help protect the security of personal information you share with us, data can never be guaranteed to be perfectly secure. We will keep your personal information only for as long as necessary for the purposes for which it was collected, to provide you with Products or Services, to carry out legitimate business interests, and where otherwise required or permitted by law.

Links to Other Websites and Services



Our Websites may provide links to other websites or content maintained by third parties and which have their own privacy policies and data collection, use, and disclosure practices. We are not responsible for the sites, content, or videos accessed via the links, and we have not reviewed the privacy practices of those third parties. We encourage you to review the privacy practices of those third parties.

Information Subject to the General Data Protection Regulation

This section applies to our collection and use of personal data of persons located in the European Union (“EU”), European Economic Area (“EEA”), and United Kingdom (“UK”) in accordance with the EU General Data Protection Regulation 2016/679 and the UK General Data Protection Regulation (collectively referred to herein as the “GDPR”). The terms “personal data”, “controller”, “processing”, and “automated decision” in this section have the same meanings set forth in the GDPR. This section also applies to our collection and use of personal data in the context of InRule AB, barium.se and live.barium.se.

THIS SECTION ONLY APPLIES TO YOU IF YOU ARE LOCATED IN THE EU, EEA, OR UK OR TO PERSONAL DATA PROCESSED IN THE CONTEXT OF INRULE AB. In the event of a conflict between this section and the remainder of the Policy, this section shall control for those persons located in the EU, EEA, or UK and for data processed in the context of Barium.

Controller. InRule Technology Inc., 651 W. Washington Blvd, Suite 500, Chicago, IL 60661, is the data controller of the personal data processed through the Websites. Generally, InRule is not the data controller for personal data processed by the customers using our Products and Services.

Legal Basis for Processing. When InRule processes your personal data, it has a legal basis for doing so as required under GDPR. InRule will only process your personal data if: (i) it has received your express opt-in consent for such processing, (ii) the processing is necessary for performance of a contract, (iii) the processing is necessary for a legal obligation to which InRule is subject, , or (iv) if InRule or a third party has a legitimate interest that is not overridden by the interests or fundamental rights and freedoms of the data subject.

Where we rely on your consent to process your personal data, you have the right to withdraw or decline consent at any time. Some examples of where we rely on your consent to process your personal data include sending you our newsletter and marketing emails. If you wish to withdraw your consent, please contact us at info@inrule.com.

Some examples of our legitimate interests for processing personal data include:

- Website and network security;
- Customer support;
- Fraud prevention; or
- Improving our Websites and products.

Where we rely on our legitimate interests to process your personal data, you may have the right to object. More information on exercising this right can be found in the Individual Rights section below.

If you have any questions about or need further information concerning the legal bases on which we collect and use your personal data, please contact us at info@inrule.com.

Individual Rights. To the extent your personal data is subject to the GDPR, you may have certain rights, including the right to request access to, correct, and delete your personal data. You may also have the right to receive a copy of your personal data in a commonly used and machine-readable format, and to



transmit such data to another controller. You also may object to processing of your personal data, or ask that we restrict the processing of your personal data in certain instances.

To request deletion of, access to, or to make changes to your personal data, or to otherwise any of the rights in this section, please contact us at info@inrule.com. Please note that not all requests can be honored.

Transfer to Third Parties and Countries. Personal data that we collect or receive may be transferred to and/or processed by third parties that are located outside of the EU, EEA, or UK, some of which EU, EEA and UK authorities may not consider to have an adequate level of protection for personal data. InRule will only transfer data subject's personal data to third-parties located outside of the EU, EEA, and UK when it has ensured appropriate safeguards for such personal data through use of the standard contractual clauses or other approved methods by the EU, EEA, and UK.

You may request a copy (which may be provided as a summary) of any such appropriate safeguards or seek inquiries regarding such safeguards by contacting us at info@inrule.com. We will respond to your request or inquiry within a reasonable period of time.

California Residents

This section applies to our collection and use of personal information if you are a resident of California, as required by the California Consumer Privacy Act and its implementing regulations ("CCPA"), as amended by the California Privacy Rights Act ("CPRA"), where "personal information" has the definition set forth in the CCPA. This section describes (1) the categories of personal information, collected and disclosed by us, subject to CCPA, (2) your privacy rights under CCPA, and (3) how to exercise your rights.

THIS SECTION ONLY APPLIES TO YOU IF YOU ARE A RESIDENT OF CALIFORNIA. In the event of a conflict between this section and the remainder of the Policy, this section shall control for residents of California.

If you would like to receive a copy of this section in an alternate format (e.g., printable) or language, please contact us using the information provided in the Contact Us section below.

We Do Not Sell or Share Personal Information. In the last 12 months we have not Sold or Shared your Personal Information and we currently do not Sell or Share Personal Information. "Sold" and "Shared" have the definition set forth in the CCPA.

Personal Information Collected. InRule makes the following disclosures regarding the personal information it has collected within the last 12 months:

<u>Category of Personal Information</u>	<u>Categories of Sources from which Category of Personal Information is Collected</u>	<u>Purpose of Collection</u>	<u>Categories of Third Parties to Whom Personal Information is Disclosed</u>	<u>Retention Period</u>



Identifiers that could identify a consumer or household, such as real name, IP addresses, or email address.	We collect this personal information directly from the user (or potential employees), from third parties, and/or through the use of cookies and related technologies.	<ul style="list-style-type: none"> • To provide the Website, Products, and Services. • For internal business purposes, including protecting the integrity of our Website, Products, and Services. • To assist us in the job application and hiring process. • For marketing purposes. 	We disclose this personal information to sub-processors (vendors) with whom we have established data protection agreements and who can demonstrate sufficient technical and organizational security measures.	We will retain the data as long as InRule has an active business relationship (or actively intends to create one) with the individual and the organization they represent. After that, we will redact the data 18 months after the last interaction.
Commercial information , such as records of purchases or consuming histories or tendencies.	We collect this personal information directly from you when you interact with our website or provide it to us through other means	<ul style="list-style-type: none"> • To provide individuals with our Products and Services, ensuring a seamless experience tailored to their needs. • For our internal business and legal purposes, enabling effective operations and compliance with applicable laws and regulations. 	We disclose this personal information to sub-processors (vendors) with whom we have established data protection agreements and who can demonstrate sufficient technical and organizational security measures.	We will retain the data as long as InRule has an active business relationship (or actively intends to create one) with the individual and the organization they represent. After that, we will redact the data 18 months after the last interaction.
Internet or network activity ,	From third parties and/or	<ul style="list-style-type: none"> • To operate and improve 	We disclose this personal information	We will retain the data as long as



for example, information on interactions with websites, provided services, apps, or advertisement.	from cookies and related technologies	<p>our Websites, ensuring a seamless user experience.</p> <ul style="list-style-type: none"> • For product development, enabling us to enhance and innovate our offerings. • To protect the integrity of our Products, maintaining a secure and trustworthy environment • For marketing purposes, providing relevant information and updates about our Products and services. 	to sub-processors (vendors) with whom we have established data protection agreements and who can demonstrate sufficient technical and organizational security measures.	<p>InRule has an active business relationship (<i>or actively intends to create one</i>) with the individual and the organization they represent.</p> <p>After that, we will redact the data 18 months after the last interaction.</p>
Professional/employment-related information , for example, job applicants' past job history.	Directly from the potential employee	To assist us in the job application and hiring process	We disclose this personal information to sub-processors (vendors) with whom we have established data protection agreements and who can demonstrate sufficient technical and organizational security measures.	<p>We will retain the data as long as InRule have an active business relationship (<i>or actively intend to create one</i>).</p> <p>After that, we will redact data 18 months after the last interaction.</p>
Education information that is not publicly available identifiable information.	Directly from the potential employee	To assist us in the job application and hiring process	We disclose this personal information to sub-processors (vendors) with whom we have established data protection agreements and who can demonstrate	We will retain the data as long as InRule has an active business relationship (<i>or actively intends to create one</i>) with the individual and the



			sufficient technical and organizational security measures.	organization they represent. After that, we will redact the data 18 months after the last interaction.
Sensory information, such as call recordings.	Directly from the user (or potential employee)	To respond to you and to improve our service to you.	We disclose this personal information to sub-processors (vendors) with whom we have established data protection agreements and who can demonstrate sufficient technical and organizational security measures.	We will retain the data as long as InRule has an active business relationship (<i>or actively intends to create one</i>) with the individual and the organization they represent. After that, we will redact the data 18 months after the last interaction.
Profile based on inferences from other categories, for example, a profile regarding consumer preferences or characteristics.	From third parties and from cookies and related technologies	<ul style="list-style-type: none"> • To create personalized experiences based on inferences from other categories, enabling us to better understand consumer preferences and characteristics • To enhance our Products and Services, tailoring them to individual needs and providing a more customized experience. 	We disclose this personal information to sub-processors (vendors) with whom we have established data protection agreements and who can demonstrate sufficient technical and organizational security measures.	We will retain the data as long as InRule has an active business relationship (<i>or actively intends to create one</i>) with the individual and the organization they represent. After that, we will redact the data 18 months after the last interaction.



Personal Information, which includes items described in Cal. Civ. Code § 1798.80(e), some of which overlap with other categories, such as a name or address	Directly from the user (and potential employees), from third parties, and from cookies and related technologies	<ul style="list-style-type: none"> • To provide the Website, Products, and Services, including protecting the integrity of our products and services, ensuring a secure and seamless experience. • To assist us in the job application and hiring process, facilitating efficient recruitment and selection. • For marketing purposes, delivering relevant information and updates about our offerings. 	We disclose this personal information to sub-processors (vendors) with whom we have established data protection agreements and who can demonstrate sufficient technical and organizational security measures.	We will retain the data as long as InRule has an active business relationship (<i>or actively intends to create one</i>) with the individual and the organization they represent. After that, we will redact the data 18 months after the last interaction.
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California Privacy Rights. California residents have the following rights under the CCPA:

<u>Privacy Right</u>	<u>Description</u>
Notice	The right to be notified of what categories of personal information will be collected at or before the point of collection and the purposes for which they will be used and shared.
Access	The right to request the categories of personal information that we collected in the previous twelve (12) months, the categories of sources from which the personal information was collected, the specific pieces of personal information we have collected about you, and the business purposes for which such personal information is collected and shared. You may also have the right to request the categories of personal information which were disclosed for business purposes, and the categories of third parties in the twelve (12) months preceding your request for your personal information.



Data Portability	The right to receive the personal information you have previously provided to us.
Erasure	The right to have your personal information deleted. However, please be aware that we may not fulfill your request for deletion if we (or our service provider(s)) are required or permitted to retain your personal information for one or more of the following categories of purposes: (1) to complete a transaction for which the personal information was collected, provide a good or service requested by you, or complete a contract between us and you; (2) to ensure our Websites' integrity, security, and functionality; (3) to comply with applicable law or a legal obligation, or exercise rights under the law (including free speech rights); or (4) to otherwise use your personal information internally, in a lawful manner that is compatible with the context in which you provided it.
Correction	You have the right to request that we correct any incorrect personal information that we collect or retain about you, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see below), we will correct (and direct any of our service providers that hold your data on our behalf to correct) your personal information from our records, unless an exception applies. We may deny your correction request if (a) we believe the personal information we maintain about you is accurate; (b) correcting the information would be impossible or involve disproportionate; or (c) if the request conflicts with our legal obligations.

Rights Requests. Only you, or a person properly authorized to act on your behalf, may make a request related to your personal information. You may also make a request on behalf of your minor child. The request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Be described with sufficient detail to allows us to properly understand, evaluate, and respond to it.

We may deny certain requests, or only fulfill some in part, as permitted or required by law. For example, if you request to delete personal information, we may retain personal information that we need to retain for legal purposes.

To exercise your California rights described in this section, please contact us at info@inrule.com, or complete the form located at <https://inrule.com/inrule-technology-data-privacy-us/>.

Verification. We may be required to verify your identity before fulfilling your requests. If we cannot initially verify your identity, we may request additional information to complete the verification process, and we will only use personal information provided in a request to verify the requestor's identity. If you are an authorized agent making a request on behalf of a California consumer, we may also need to verify your identity and authorization. We cannot respond to your request or provide you with personal information if we cannot verify your identity and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us.



Fees. We do not charge a fee to process or respond to your request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination. InRule will not discriminate against you in the event you exercise any of the aforementioned rights under the CCPA, including, but not limited to, by:

- denying goods or services to you;
- charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
- providing a different level or quality of goods or services to you; or
- suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

Complaints. The CCPA gives California Consumers the right to lodge a complaint with the California Attorney General’s office. The Attorney General’s office may be contacted at <https://oag.ca.gov/contact/consumer-complaint-against-business-or-company> or by telephone at: (916) 210-6276.

Accessibility. The Policy is available to consumers with disabilities. To access this Policy in an alternative format, please [click here](#).

In your request, please attest to the fact that you are a California resident and provide a current California address for our response. Please be aware that not all information sharing is covered by these California privacy rights requirements and only information on covered sharing will be included in our response.

Shine the Light. Pursuant to California Civil Code Section 1798.83, if you are a California resident, you have the right to obtain: (a) a list of all third parties to whom we may have disclosed your personal information within the past year for direct marketing purposes, and (b) a description of the categories of personal information disclosed, by contacting us per the “Contacting Us” section below. In your request, please attest to the fact that you are a California resident and provide a current California address for our response.

Children’s Personal Information

Our Products, Services, and Websites are not directed to or intended to be used by individuals under the age of 16. We do not knowingly request or collect personal information from any person under 16 years of age without prior verifiable parental consent. If you believe that your child under the age of 16 has submitted personal information to us, and without prior verifiable parental consent, please email us at info@inrule.com so that we can take steps to delete the personal information that she or he provided as required in accordance with applicable law.

Contacting Us

If you have questions about this Policy or our privacy practices, please contact us by email at info@inrule.com or write to us at:

InRule Technology, Inc.
651 W. Washington Blvd, Suite 500
Chicago, IL 60661

Updates to this Policy



We may make changes to this Policy, and may apply any changes to information previously collected, as permitted by law. When we make material changes to this Policy, we will notify you by e-mail and/or by posting the updated Policy on our Websites, and we will update the effective date at the top of this Policy.

Unsubscribe

To unsubscribe from InRule email updates at any time, please [visit this page](#).

