

Last Updated/Effective Date: December 17, 2024

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 privacy@inrule.com. Please read this Policy carefully to understand our policies and practices regarding your Personal Information and how we will treat it. To access this Policy in an alternative downloadable format, please [click here](#).

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

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

We may provide you with a different privacy notice or policy in certain specific situations, in which case that privacy notice or policy will apply to the Personal Information collected or processed in that specific situation, rather than this one.

If you provide us with Personal Information related to anyone other than yourself, please note that you are responsible for complying with all privacy and data protection laws prior to providing that information to InRule (including collecting consent, if required).

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, credit card or other payment information, and 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 comments to the blog posts or form fields on our Websites;

- **Correspondence information**, including information about your email or other written communications with us, and information that you share in your emails and other written 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 (collectively, “automatically collected information”). Automatically collected information may include IP addresses, countries of origin, unique device identifiers, cookie identifiers, device and browser settings and information, and Internet service provider information. Automatically collected information also may 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 Website, and the website pages and items you view using our Websites.

How We Use Information

We use the 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 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 to provide social media features, to send 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 and 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 share 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 processors), that help us market or advertise to you (including co-branded/reseller marketing and advertising), including our advertising and analytics partners (see “Cookies and Related Technologies” section below for more information). We may use third parties or service providers to perform any of the actions or activities allowed under this Policy;

- **Social media platforms and networks**, such as LinkedIn and Twitter/X, that offer functionalities, plugins, widgets, or tools in connection with our Websites (for example, to share purchases and other content from our Websites with your friends and followers on social media). If you choose to use these functionalities, plugins, widgets, or tools, certain information will be shared with or collected by those social media companies. For more information about what information is shared 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 shared, 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 Information” Section above, or otherwise to help prevent harm or fraud to us, you, our customers, or other third parties. We also may share personal information with third parties upon your request or with your consent, although we may not be able to accommodate all requests.
- **Public government authorities**, in response to lawful requests to meet national security or law enforcement requirements.
- **Other.** We may share personal data 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 data 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 content delivery, 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. We use cookies and other trackers through the following third parties, amongst others:

- **Adobe:** We use Adobe Typekit to serve fonts on our Websites, which is governed by [Adobe Typekit's Privacy Policy](#)
- **Google:** To learn more about how Google uses data, visit [Google's Privacy Policy](#) and Google's page on "[How Google uses data from sites or apps that use our services](#)." You may download the [Google Analytics Opt-out Browser Add-on](#) for each web browser you use, but this does not prevent the use of other analytics tools. To learn more about Google Analytics cookies, visit [Google Analytics Cookie Usage on Websites](#).
- **Meta:** We use Meta pixels to track user activity on our Websites and improve downstream offerings, including interest-based advertising for our services and those of our partners and service providers.
- **Microsoft:** We partner with Microsoft Clarity and Microsoft Advertising to capture how you use and interact with our Websites through behavioral metrics, heatmaps, and session replay to improve and market our products/services. Website usage data is captured using first and third-party cookies and other tracking technologies to determine the popularity of products/services and online activity. Additionally, we use this information for site optimization, fraud/security purposes, and advertising. For more information about how Microsoft collects and uses your data, visit the [Microsoft Privacy Statement](#).

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 our Terms of Use and this policy.

Cookies. Visit our preferences page or customize your browser settings to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable certain cookies, please note that some parts of our Websites may not function properly. These settings may be lost and require reconfiguration if you delete your 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.

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>.

Exercising Your Privacy Rights

Depending on where you live, you may have the following rights with respect to your Personal Information under applicable data protection laws:

- *Access* – The right to request access to and obtain a copy of any Personal Information we may have about you.
- *Deletion* – The right to delete your Personal Information that we have collected or obtained, subject to certain exceptions.
- *Correction* – The right to request that we correct any inaccuracies in your Personal Information, subject to certain exceptions.

- *Opt Out of Certain Processing* – The right to: (a) opt out of the processing of your Personal Information for purposes of targeted advertising, (b) opt out of the sale of your Personal Information; (c) limit the use of your sensitive Personal Information (if applicable), and (c) opt out of profiling in furtherance of decisions that produce legal or similarly significant effects.
- *Objection/Restriction of Processing* – The right to object or restrict us from processing your Personal Information in certain circumstances.
- *Withdraw Consent* – The right to withdraw your consent where we are relying on your consent to process your Personal Information.
- *Automated Decision-Making* – The right to know when you are subject to automated decision-making, the Personal Information used to render the decision, the principal factors and parameters involved in the decision, and human review or correction of the decision (or its underlying data, where appropriate). You may also have the right to consent or opt out of this automated decision-making, depending on your location.
- *Lodge a Complaint* – The right to lodge a complaint with a supervisory authority or other regulatory agency if you believe we have violated any of the rights afforded to you under applicable data protection laws. We encourage you to first reach out to us so we have an opportunity to address your concerns directly before you do so.

To exercise any of the privacy rights afforded to you under applicable data protection laws, e-mail us at privacy@inrule.com or submit a request through our web form at <https://inrule.com/inrule-technology-data-privacy-us/>. You may also exercise your opt-out rights by broadcasting an Opt-Out Preference Signal, such as the Global Privacy Control (GPC). We honor Opt-Out Preference Signals, including GPC. If you choose to use an Opt-Out Preference Signal, you will need to turn it on for each supported browser or browser extension you use.

You will not be discriminated against in any way by virtue of your exercise of the rights listed in this Policy. However, should you withdraw your consent or object to processing of your Personal Information, or if you choose not to provide certain Personal Information, we may be unable to provide some, or all, of our Services to you.

Only you, or an authorized agent that you authorize to act on your behalf, may make a request related to your Personal Information. We must verify your identity before fulfilling your requests, and if we cannot verify your identity, we may request additional information from you. If you are an authorized agent making a request on behalf of another person, we will also need to verify your identity, which may require proof of your written authorization or evidence of a power of attorney. We endeavor to respond to requests within the time period required by applicable law. If we require more time, we will inform you of the reason and extension period in writing.

We do not charge a fee to process or respond to your requests unless they are excessive or repetitive. If we determine that a request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request. We may deny certain requests, or only fulfill some in part, as permitted or required by law. If you are not satisfied with the resolution of your request and you are afforded a right to appeal such decision, you will be notified of our appeal process in our response to your request.

Security and Retention

Although we take steps to help protect the security of personal information you share with us, information transmitted through the Internet may not be perfectly secure. We do not guarantee the security of your personal information. 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 Internet sites, content, or videos (embedded or direct links) maintained by third parties. 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”). This section also applies to our collection and use of Personal Information 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.

Legal Bases for Processing

Our legal basis for processing Personal Information depends on the Personal Information involved and the context in which we process it. Where InRule acts as a controller, we process your Personal Information: with your consent; where necessary to perform a contract; to comply with our legal obligations; and where doing so is in our legitimate interests (including the purposes described in this Notice) and such interests are not outweighed by your rights and freedoms.

Special Category Data

InRule does not intend to collect any Special Category Data, which is any data that reveals your racial or ethnic origin, political opinions, religious, moral or philosophical beliefs, trade union membership, political views, the processing of genetic data, biometric data for the purpose of identifying a person, and data concerning health or a person's sex life and/or sexual orientation. Please refrain from sending us any Special Category Data.

EU-U.S. Data privacy Framework. Personal data that we collect or receive may be transferred to and/or processed by third parties that are located outside of the EU, including the United States.

InRule complies with the EU-U.S. Data Privacy Framework ("EU-U.S. DPF") as set forth by the U.S. Department of Commerce and has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles ("EU-U.S. DPF Principles") with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF. If there is any conflict between the provisions in this Policy and the EU-U.S. DPF Principles, the Principles shall govern. To learn more about the EU-U.S. DPF program and to view our certification, please visit <https://www.dataprivacyframework.gov/>. InRule does not currently rely on the Swiss-U.S. Data Privacy Framework or the UK Extension to the EU-U.S. Data Privacy Framework to transfer personal data to the United States.

InRule remains responsible for any of your personal data that is shared under the Onward Transfer Principle with third parties for external processing on our behalf, as described in the "How We Disclose Personal Information" section of above.

If you have an inquiry regarding our privacy practices in relation to our EU-U.S. DPF certification, we encourage you to contact us at privacy@inrule.com. InRule is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission.

InRule commits to refer unresolved privacy complaints under the EU-U.S. DFP Principles to an independent recourse mechanism, “JAMS” (Judicial Arbitration and Mediation Services, Inc). If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <https://www.jamsadr.com/dpf-dispute-resolution> for more information and to file a complaint. In certain circumstances, the EU-U.S. DPF provides the right to invoke binding arbitration to resolve complaints not resolved by other means, as described in [Annex I to the DPF Principles](#).

In compliance with the EU-U.S. DPF, InRule commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) with regard to unresolved complaints concerning our handling of human resources data received in reliance on the EU-U.S. DPF in the context of the employment relationship.

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.

We Do Not Sell Personal Information. In the last 12 months we have not Sold your personal information and we currently do not Sell personal information. However, depending on how you have interacted with us, we may have Shared your Personal Information. “Sold” and “Shared” have the definition set forth in the CCPA.

Sensitive Information. We do not (1) collect or process Sensitive Information for the purpose of inferring characteristics consumers, or (2) use and disclose Sensitive Information for any purpose other than those set out in Section 7027(m) of the CCPA Regulations. “Sensitive Information” has the definition set forth in the CCPA.

Please see the below chart for detailed information about the categories of Personal Information we have collected from California residents during the twelve months preceding the date on which this Policy was last updated and the categories of third parties to whom we sell or share Personal Information. For each category of Personal Information set forth in the chart below, the categories of

third parties to whom we disclose it for a business or commercial purpose are set forth in the “How We Disclose Personal Information” section above.

<u>Category of Personal Information</u>	<u>Categories of Third Parties to Whom We Sell or Share Personal Information</u>
Identifiers that could identify a consumer or household, such as real name, IP address, or email address.	Third-party marketers, analytics providers, and other third parties that set cookies and other online tracking technologies on our Websites.
Commercial information , such as records of purchases or consuming histories or tendencies.	Third-party marketers, analytics providers, and other third parties that set cookies and other online tracking technologies on our Websites.
Internet or network activity , for example, information on interactions with websites, provided services, apps, or advertisement.	Third-party marketers, analytics providers, and other third parties that set cookies and other online tracking technologies on our Websites.
Professional/ employment-related information , for example, job applicants’ past job history.	We do not Sell or Share this category of Personal Information.
Education information that is not publicly available identifiable information.	We do not Sell or Share this category of Personal Information.
Sensory information , such as call recordings.	We do not Sell or Share this category of Personal Information.

<p>Profile based on inferences from other categories, for example, a profile regarding consumer preferences or characteristics.</p>	<p>We do not Sell or Share this category of Personal Information.</p>
<p>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.</p>	<p>Third-party marketers, analytics providers, and other third parties that set cookies and other online tracking technologies on our Websites.</p>

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

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 privacy@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 privacy@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, please [visit this page](#).