

## Privacy Policy

Catalyst Repository Systems, Inc. (“Catalyst”) and its affiliate TotalDiscovery LLC (“TotalDiscovery”) provide e-discovery software for litigation support, compliance, and document management.

During the course of providing services, we receive a wide variety of data, some of which includes personal information. In addition, we sometimes receive personal information from individuals who access our website, seek materials from us, or attend our educational programs.

We are committed to protecting personal data, whether required by law, agreement or otherwise. We will not under any circumstances sell, rent or barter any information we receive from clients, users or visitors for any reason.

This Privacy Policy sets forth how we use the data we receive and how we handle questions or concerns that you might have. It is divided into four categories reflecting:

1. Data received from clients
2. Data collected from users of our platforms
3. Data collected from visitors to our websites
4. How we treat data that is regulated under the GDPR (the EU’s [General Data Protection Regulations](#)).

This privacy policy applies to Catalyst, TotalDiscovery, and the software and services we provide.

### 1. Data received from Clients

Data we receive from clients belongs to the client. Decisions regarding what information gets processed and hosted, and who is allowed to access it, are made by the client. This includes any personal information we host on our platform.

For that reason, we treat all client data as confidential and will not disclose it to third parties for any reason unless directed by the client or required to by law, subpoena or other legal process. Should we receive a legal demand for data, we will contact the client for directions unless prohibited from doing so by law or court order.

We grant access to client data to our employees and contractors in order to deliver services requested by a client. All such employees and/or contractors are bound by confidentiality agreements.

## 2. Data collected from Users

Users of our platform are authorized by our clients. We collect data from users when they register, interact with the platform, or otherwise communicate with us.

We treat this information as confidential and will not use for any purpose other than providing our services, support, and communications with that user.

## 3. Data collected from Visitors

Catalyst collects information from visitors to our website and from third parties so that we may communicate with you about relevant products, services and related information. Communication includes email, telephone, direct mail, social media or other communication formats subject to ensuring that such communications are provided to you in compliance with applicable law.

We do not sell, give, or trade the personal information or statistics we store to any third parties for data-mining or marketing purposes. At any time, you may unsubscribe from our promotional communications by simply clicking on the unsubscribe link included in every email or newsletter we send, or by contacting us at [support@catalystsecure.com](mailto:support@catalystsecure.com). After you unsubscribe, we will not send you further emails, but we may continue to contact you to the extent necessary for the purposes of any products, services or other specific information you have requested.

### ***Why We Collect Your Information***

Catalyst may access and use your personal data, as reasonably necessary and in accordance with your consent to:

- Send you content downloads or subscriptions requested via the website.
- Send you general marketing communications.
- Send you email notifications which you have specifically requested.
- Send you our newsletter and other marketing communications (relating to our business which we think may be of interest to you, such as online event invitations).
- Respond to inquiries you have made relating to our products and services (including but not limited to a request for a meeting or product demonstration).
- Improve your browsing experience on our website.

## ***How We Collect Information***

### Catalyst Website

- a. Web forms: We use web forms to collect basic personal data that will enable us to communicate with you. You are the sole source of information provided to us on our website. Our website may collect any or all of the following: name (first, last), business email address, business phone number, job title, company name, and mailing address.
- b. Cookies: We also collect data through the use of cookies. A cookie is a small piece of data that gets entered into the memory of a browser and is stored on your computer's hard drive. The cookie helps analyze web traffic and lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual, for example, customizing its operations to your needs and enabling you to not have to re-enter information to get access to certain information in the event you decide to revisit our site. Although each browser is different, most browsers will allow users to establish their own preferences to accept cookies, reject them or notify you when a cookie is set.
- c. Google Analytics: We use Google Analytics to collect information about your use of the website. Aggregation of this information enables us to improve our website's usability, track domains from which people visit, provide information on our online advertising and optimize our advertising performance, and measure visitor activity. Google Analytics uses cookies and other, similar technologies to collect information about the website use and to report website trends to us, without identifying individual visitor information to us. We may use this data to analyze website trends and help us improve. To learn more about the information collected by Google Analytics, please visit <https://www.google.com/policies/privacy/>.

### *Third Party Sources*

Catalyst also receives information about you from third-party sources, including public and private databases, lead generation services, third-party event organizers, marketing partners with whom we do business, and social media sites.

## **4. Data Subject to GDPR Regulations**

We are committed to handling data coming from EU countries in accordance with the Privacy Shield framework. That program authorizes Catalyst and TotalDiscovery to store and host EU personal data with appropriate procedures for data subjects to request access to, and modify, personal data.

Catalyst's registration: <https://www.privacyshield.gov/>

Catalyst Privacy Shield policy: <https://www.catalystsecure.com/>

TotalDiscovery's registration <https://www.privacyshleld.gov/>

TotalDiscovery Privacy Shield policy: <https://www.totaldiscovery.com/>.

### **Data Controller and Data Processor**

Our clients act as data controllers under the GDPR. A data controller determines the purposes for which and the means by which personal data is processed.

For our clients, Catalyst and TotalDiscovery act as data processors. A data processor processes personal data only on behalf of the controller.

For our users and visitors, Catalyst and TotalDiscovery act as data controllers.

Our client determines what data to store in the Catalyst or TotalDiscovery platform, who can access that data, and the ultimate disposition of that data. Our clients must obtain permission or have other legitimate bases to collect and process information in accordance with the GDPR. As a data processor, our responsibility is to provide services and keep the data we maintain secure in accordance with client instructions.

### **Data Security**

We regularly review our policies, processes, and procedures to ensure that they are addressing our obligations to GDPR as a data processor. In general, we employ what we believe are reasonable efforts to maintain the accuracy and integrity of personal data received from our clients or its agents and, at the client's direction will endeavor to update or correct it as appropriate.

We have implemented physical and technical safeguards to protect personal data from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. For example, electronically stored personal data is stored on a secure network with firewall protection, and access to our systems requires user authentication via password or other means. Data is transmitted in encrypted form.

### **Right to Access, Change or Delete Personal Data**

For data provided by our clients, subject access requests (SARs) should be routed through the client. We will take directions from our client, acting as data controller, with regard to making personal data accessible to a data subject. If we receive a SAR for access to personal data, then, unless otherwise required under law or contract, we will forward the request to the client for instructions.

When Catalyst or TotalDiscovery is the data controller for users of our platform, users are authorized by our clients. As such, we will treat data collected about users as

equivalent to client provided data. We will look to the data controller for guidance.

When Catalyst or TotalDiscovery is the data controller for visitors to our websites, you may contact [support@catalystsecure.com](mailto:support@catalystsecure.com) for help with SAR requests.

### **Disputes**

Should there be a dispute between the client and the data subject over the right to correct, edit, amend, block, erase or otherwise change their personal data, we will seek guidance from the client or other appropriate authority before taking any action.

### **Other Uses**

We may share your personal data under a suitable confidentiality agreement as part of a sale, merger or change in control, or in preparation for any of these events. Any other entity which buys us or part of our business will have the right to continue to use your data, but only in the manner set out in this Privacy Policy unless you agree otherwise.

### **Questions and Compliance**

People who have questions about this privacy policy or who believe that we have violated it should contact us by phone at 303-824-0900 or [support@catalystsecure.com](mailto:support@catalystsecure.com). We will work with you to address your issues.

### **Policy Updates**

This policy may be updated from time to time. We will change the revision date at the bottom of the policy when modifications occur.

Current Revision July 1, 2018